

6. Plaintiffs should be granted authority to amend their complaint by interlineations so as to increase the amounts sued for as follows:

For - actual damages in the amount of \$ and punitive damages in the amount of \$.

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7. Defendant should be ordered to promptly produce copies of all professional liability insurance policies or any other policies of insurance either providing or which may provide coverage for the claims described in the complaint.

WHEREFORE, PREMISES CONSIDERED, plaintiffs request the Court to enter an order

(a) overruling defendant's motion requesting a rule of court as to the above specifically enumerated discovery items and requiring the defendant to answer or respond to said items immediately, and to produce within a reasonable time the insurance policies described in paragraph 7 above;

(b) setting this cause for trial at the earliest possible time that is reasonably practical and convenient; and

(c) authorizing plaintiffs to amend their complaint by interlineations so as to increase the amounts sued for consistent with the figures set forth above.

Respectfully submitted,

Attorney for

Of Counsel:

Telephone:
MSB #
Attorney for

CERTIFICATE OF SERVICE

This is to certify that I, , have this day served a true and correct copy of the foregoing Plaintiffs' Response to Defendant's Motion Requesting a Rule of Court, Including

Plaintiffs' Motion for Relief to Honorable _____, attorney for the defendant, by electronic means, to his/her FAX number of _____.

This the _____ day of _____, 20____.
