

Instruction: This is a SAMPLE letter. Adapt to fit your facts and circumstances.

<date>

<attorney opposite>

<address>

<address>

<address>

RE: <style of case>

Dear <attorney opposite>:

Pursuant to the Court's Pre-Trial Order, the following is a listing of the exhibits that Plaintiff may offer into evidence:

1. _____ Corporation Safety Sign Kit No. 1 for V-Type Printer-Slotter (Depo. of Lawrence Taylor)
2. Letter from _____ Company to mead containers Division dated 4/2/71, RE: Safety Information - Solid (Non-Split) Printer-Slotter (Depo. of _____).
3. Letter from _____ Company to Mead Container Division dated 4/2/71, RE: Safety Information - Solid (Non-Split) Printer-Slotter (Depo. of _____).
4. Wash-up procedure for _____ "V" type printer-slotter (Without Baldwin Press Washer) (Depo. of _____).
5. Information on Safety Kits offered by _____ (Depo. of _____).
6. Illustration of _____ Type "VI" (Depo. of _____).
7. Drawing of Type "YZ" Printer-Slotter (Depo. of _____).
8. Drawing of Type " VZ" Printer-Slotter (Depo. of _____).
9. Drawing of Mounting Area (Depo. of _____).
10. Floor Plan Type "VP" Special Printer-Slotter Drawing No. 6557-11 (Depo. of _____).

11. Data Sheet from National Safety Council on "Management Safety Policies" (Depo. of Lawrence Taylor).
12. Data Sheet from National Safety Council on "Printer-Slotter" (Depo. of _____).
13. Photograph (Depo. of _____).
14. Photograph (Depo. of _____).
15. Photograph (Depo. of _____).
16. Photograph (Depo. of _____).
17. Photograph (Depo. of _____).
18. Photograph (Depo. of _____).
19. Photograph (Depo. of _____).
20. Photograph (Depo. of _____).
21. Photograph (Depo. of _____).
22. Photograph (Depo. of _____).
23. Photograph (Depo. of _____).
24. Photograph (Depo. of _____).
25. Vol. 19, No. 2, _____ Leader, Sept. 1973 (Depo. of _____).
26. Fountain Configuration (Depo. of _____).
27. Printer-Slotter Data drawing (Depo. of _____).
28. Printer-Slotter file (Depo. of _____).
- 28.A *(Number reserved for document to be supplied) Additional documents with Printer-Slotter file (Depo. of _____).
29. _____ Liability Claim (Depo. of _____).
30. _____ Liability Claim (Depo. of _____).

31. _____ Liability Claim (Depo. of _____).
32. Position Description (Depo. of _____).
33. Memo 3/30/93 (Depo. of _____).
34. Trouble Shooting Guide (Depo. of _____).
35. V2 Printer-Slotter 7051 (Depo. of _____)
36. Maintenance Bulletin #5 (Depo. of _____)
37. Printer-Slotter Data (Depo. of _____)
38. Telephone Data Information Sheet 6/15/93 (Depo. of _____)
39. Drawing VSX (Depo. of _____)
40. Drawing 2/27/46 (Depo. of _____)
41. Invoice (Depo. of _____)
42. Copy of Business card (Depo. of _____)
43. * (Number reserved for document to be supplied) A letter stating change of procedure for routing inquiries to Custom Engineering without unilaterally supplying instruction manuals and parts manuals. (Depo. of _____)
44. * (Number reserved for document to be supplied) Survey that shows known entries on the V style or V type printer-slotter (Depo. of _____)
45. _____ corporate history (Depo. of _____)
46. Amended Notice of Deposition (Depo. of _____)
47. Saturn IV _____ Flexo Folder Gluer - Operator's Procedure Manual (Technical Literature)
48. Zero Energy State (ZES) for fishing machinery - _____ Saturn IV Flexo, folder gluer, counter injector

- 49. Medical illustration
- 50. Medical illustration
- 51. Medical illustration
- 52. Medical illustration
- 53. Mortality table
- 54. Summary of medical bills with bills attached

Dr. _____ will have additional exhibits that you can review at his deposition and we will number there. Please let me know by tomorrow if you want me to have those exhibits ready now for you. As you can expect, there will be many governmental standards or industry standards or regulations that would be applicable and/or which form the basis of Dr. _____'s opinions which have been provided. These will be numbered separately and will be in addition to those, which have been enumerated above.

My recollection is that I have identified for you Dr. _____ and provided you a summary of his opinions as well as _____, a vocational expert. You did mention to me you wanted to take Dr. _____'s deposition. Do you want to take _____'s deposition?

The doctors that did the operation on _____ are all out of state. Two are in _____ and one is in _____. Let me know if you have any objection to taking videotape depositions of those doctors. There are two in _____, _____ and we can do those on the same date (hopefully).

With respect to lost wages and lost future wages, that evidence will be based, in part, on _____'s opinion with respect to Mr. _____'s earning capacity and/or anticipated future earnings. As you know, Mr. _____ has lost considerable wages

from the time of his injury and will lose wages in the future because of the severity of his injury. If you would like my calculation, please advise.

These exhibits are available for your inspection at our office. The mortality tables cover the Acts of _____. We have photographs of the medical illustrations which can be sent to you and if you would like a copy of the summary of medical bills and/or bills, please advise. This may save you a trip to my office.

Sincerely,