<table>
<thead>
<tr>
<th>Source</th>
<th>Likely Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Client</td>
<td>Occurrence, other witnesses, damages, etc.</td>
</tr>
<tr>
<td>Witnesses</td>
<td>Occurrence, other witnesses, injuries, etc.</td>
</tr>
<tr>
<td>Scene of accident</td>
<td>Obstructions, distances, special circumstances, surveillance tapes</td>
</tr>
<tr>
<td>Police reports</td>
<td>Details of accident, witnesses, officer at scene, photos, sobriety tests</td>
</tr>
<tr>
<td>Event data recorder (&quot;black box&quot;, if available)</td>
<td>Digitally preserved information at time of accident on engine speed, braking, air bag deployment, malfunctions</td>
</tr>
<tr>
<td>Department of Motor Vehicles</td>
<td>Accident reports, driving records</td>
</tr>
<tr>
<td>News accounts (newspapers, microfilm, videotapes)</td>
<td>Details, witnesses, reporters</td>
</tr>
<tr>
<td>Reporters (notes)</td>
<td>Details, photos, witnesses</td>
</tr>
<tr>
<td>Emergency personnel (ambulance crew, paramedic, tow truck operator)</td>
<td>Details, injuries</td>
</tr>
<tr>
<td>Fire marshal (reports)</td>
<td>Causes of fire, witnesses</td>
</tr>
<tr>
<td>Transcripts of related trials or hearings (criminal, traffic)</td>
<td>Statements of witnesses and parties, admission</td>
</tr>
<tr>
<td>U.S. Weather Bureau</td>
<td>Official weather reports</td>
</tr>
<tr>
<td>Licensing and inspection authorities</td>
<td>Code and licensing violations</td>
</tr>
<tr>
<td>Police agencies (local police, FBI)</td>
<td>Criminal records for impeachment</td>
</tr>
<tr>
<td>Internet and public or university library</td>
<td>General reference information</td>
</tr>
<tr>
<td></td>
<td>Directories for scholarly and professional associations</td>
</tr>
<tr>
<td></td>
<td>Experts in pertinent field, consultants</td>
</tr>
<tr>
<td></td>
<td>Business information</td>
</tr>
<tr>
<td></td>
<td>Corporate information</td>
</tr>
<tr>
<td></td>
<td>Federal and state agencies</td>
</tr>
<tr>
<td></td>
<td>Census reports</td>
</tr>
<tr>
<td>Hospital</td>
<td>Names of nurses, doctors, technicians; x-rays, medications, related medical records, pain and suffering, bills</td>
</tr>
<tr>
<td>Physicisns</td>
<td>Consulting physicians, treatment history, diagnosis, prognosis, disabilities, pain and suffering, bills</td>
</tr>
<tr>
<td>Physical therapists</td>
<td>Disabilities, necessary treatment, likelihood of success</td>
</tr>
<tr>
<td>Close relatives, friends, and neighbors</td>
<td>Effects of the injury, disabilities</td>
</tr>
<tr>
<td>Medical literature</td>
<td>Injuries, medication, side effects, prognosis</td>
</tr>
</tbody>
</table>
| Department of Vocational Rehabilitation | Expert witnesses, statistics on job rehabilitation and earning potential  
Performance records, wages, firings, promotion potential |
| Injured party’s employer |  |
| **Federal Agencies** |  |
| Federal Aviation Administration (FAA),  
(202) 426-4000, www.faa.gov | Airline accidents, safety standards |
| Department of Transportation, (202) 426-4043, www.dot.gov | Vehicle and driver safety standards |
| National Oceanic and Atmospheric Administration,  
(310) 655-4000, www.noaa.gov | Certified weather reports |
| National Climatic Data Center, Asheville, NC,  
www.ncdc.noaa.gov | Certified weather information by state |
| Department of Agriculture, (202) 655-4000,  
www.usda.gov | Aerial photos, plants, wildlife |
| Department of Interior (Geologic Survey), www.doi.gov | Maps |
| Occupational Safety and Health Administration,  
| Agency for Toxic Substances and Disease Registry,  
www.atsdr.cdc.gov (See also the medical and other sites listed in this exhibit.) | Toxicity, sites, advisories |
| **State Agencies** |  |
| www.state.[your state’s two-letter abbreviation].us | Traffic flow, highways, bridges, signals, signs |
| Department of Transportation | Industrial safety rules and regulations, statistics |
| Department of Labor and Industry | Geological surveys |
| Department of Geology | Corporate addresses, officers |
| Office of Secretary of State (corporations) | Auto liability coverage, insurance company requirements |
| Department of Insurance | Licensing requirements of trades and businesses |
| Department of Business and Professions | Certified records of birth, death, divorce, etc. |
| Bureau of Vital Statistics | Personal property licenses, taxes, ownership, transactions |
| Department of Revenue | Directory of state agencies |

### County and Local Agencies

Check county (parish), city, or town Web sites for local agencies.

<table>
<thead>
<tr>
<th>Agency</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>Courthouse (clerk’s offices)</td>
<td>Lawsuits, criminal cases, property ownership, liens, UCC filings (also see Exhibit 3.2)</td>
</tr>
<tr>
<td>Tax Assessor’s Office</td>
<td>Ownership, location, taxes, and assessed value of property</td>
</tr>
<tr>
<td>Voter Registration</td>
<td>Voter’s address, age, sex, race, and voting precinct</td>
</tr>
<tr>
<td>District, County, or City Attorney’s Office</td>
<td>Criminal records, location of person</td>
</tr>
<tr>
<td>Coroner’s Office</td>
<td>Cause of death and related hearings, records</td>
</tr>
<tr>
<td>Chamber of Commerce</td>
<td>Local businesses, services, literature</td>
</tr>
<tr>
<td>Department of Public Works and Traffic</td>
<td>Street blueprints, timing of traffic lights, expert witnesses, statistics</td>
</tr>
<tr>
<td>Universities and colleges</td>
<td>Experts in a variety of fields</td>
</tr>
</tbody>
</table>
EXHIBIT 3:2  General Resource Guide for Investigation on the Web

(Consult also government, court, paralegal association, and ethics Web sites at the end of Chapter 1)

**General Web Directories and Search Engines**

For information not normally found by common search engines:
http://lii.org
http://aip.completeplanet.com

Librarians Internet Index

**Common search engines**

- www.yahoo.com
- www.google.com
- www.altavista.com
- www.excite.com
- www.hotbot.com

Blog directories:
- www.blogsearchengine.com
- www.bloglines.com
- www.technorati.com

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### Law Search Engines

- [www.findlaw.com](http://www.findlaw.com)  
  free service owned by Westlaw  
- [www.lawresearch.com](http://www.lawresearch.com)  
- [www.lawreader.com](http://www.lawreader.com)  
- [www.virtualchase.com](http://www.virtualchase.com)  
- [www.lawguru.com](http://www.lawguru.com)  
- [www.ilrg.com](http://www.ilrg.com)  
  Internet Legal Resource Guide  
- [www.internetlawyer.com](http://www.internetlawyer.com)  
- [www.lawofficecomputing.com](http://www.lawofficecomputing.com)

- [www.law.cornell.edu](http://www.law.cornell.edu)  
  federal and state statutes, decisions, rules, etc.  
- [www.westlaw.com](http://www.westlaw.com)  
- [www.lexis.com](http://www.lexis.com)  
  free service at [www.lexisone.com](http://www.lexisone.com)  
- [www.loislaw.com](http://www.loislaw.com)  
  (Legal dictionaries)  
- [www.duhaime.org](http://www.duhaime.org)  
- [www.lectlaw.com/d-a.htm](http://www.lectlaw.com/d-a.htm)  
  (Verdicts)  
- [www.internetlawyer.com](http://www.internetlawyer.com)

### Government Resources

- [www.uscourts.gov](http://www.uscourts.gov)  
- [www.firstgov.gov](http://www.firstgov.gov)  
  official links to U.S. and some state sites  
- [www.governmentguide.com](http://www.governmentguide.com)  
- [www.fedworld.gov](http://www.fedworld.gov)  
  list of government resources  
- [www.fedstats.gov](http://www.fedstats.gov)  
  links to federal statistics  
- [www.census.gov](http://www.census.gov)  
  Census Bureau  
- [www.whitehouse.gov](http://www.whitehouse.gov)  
- [www.house.gov](http://www.house.gov)  
- [www.senate.gov](http://www.senate.gov)  
  [http://thomas.loc.gov](http://thomas.loc.gov)  
  pending and passed legislative bills by topic or title  
- [www.gpoaccess.gov](http://www.gpoaccess.gov)  
  federal documents from the U.S. Government Printing Office  
- [www.nfoic.org](http://www.nfoic.org)  
  federal and state freedom of information requests  
- [www.forms.gov](http://www.forms.gov)  
  official U.S. forms  
- [www.ntis.gov](http://www.ntis.gov)  
  National Technical Information Service  
- [http://faxxon.cifnet.com/faxxon](http://faxxon.cifnet.com/faxxon)  
  links to Secretary of State homepages for all 50 states  
- [www.loc.gov](http://www.loc.gov)  
  Library of Congress

### Investigative Resources

- [www.merlindata.com](http://www.merlindata.com)  
  index of investigative research sites  
- [www.militarysearch.org](http://www.militarysearch.org)  
  military status of any person

### Consumer and Product Information

- [www.cpsc.gov](http://www.cpsc.gov)  
  Consumer Product Safety Commission  
- [www.pueblo.gsa.gov](http://www.pueblo.gsa.gov)  
  Consumer Information Center  
- [www.consumer.gov](http://www.consumer.gov)  
  U.S. Consumer Gateway (resources by subject)

### Environmental/Occupational Safety

- [www.epa.gov](http://www.epa.gov)  
  Environmental Protection Agency  
- [www.osha.gov](http://www.osha.gov)  
  Occupational Safety and Health Administration  
- [www.nhtsa.gov](http://www.nhtsa.gov)  
  National Highway Traffic Safety Administration  
  (vehicle complaints, investigations, recalls)  
- [www.ansi.org](http://www.ansi.org)  
  American National Standards Institute  
- [www.nacaa.net](http://www.nacaa.net)  
  National Association of Consumer Agency Administrators  
- [www.cdc.gov/niosh/about.html](http://www.cdc.gov/niosh/about.html)  
  National Institute for Occupational Safety and Health  
- [www.atsdr.cdc.gov](http://www.atsdr.cdc.gov)  
  Agency for Toxic Substances and Disease Registry  
  (continued)
### Business, Labor, and Employment

- www.doc.gov  
  U.S. Department of Commerce  
- www.dol.gov  
  Department of Labor  
- www.sba.gov  
  Department of Commerce, Small Business Administration  
- www.uspto.gov  
  U.S. Patent and Trademark Office  
- www.bbb.org  
  Better Business Bureau  
- www.ftc.gov  
  Federal Trade Commission  
- www.hoovers.com  
  Hoovers (information on public companies)  
- www.law.cornell.edu/uniform/vol7.html  
  Uniform Securities Act  
- www.companylink.com  
  data on companies  
- www.corporateinformation.com  
- www.incspot.com  
  U.C.C./corporate filings  
- www.sec.gov  
  U.S. Securities and Exchange Commission

### People/Business Locators

- www.anywho.com  
- www.accurint.com  
  fee: extensive personal information  
- www.reversedirectory.langenber.com  
- www.knowx.com  
- www.databaseamerica.com  
- www.switchboard.com  
- http://people.yahoo.com  
- www.ancestry.com  
- social security death index  
- www.bop.gov  
  Bureau of Prisons, find prison inmates

### Climate Reports

- www.noaa.gov  
  National Oceanic and Atmospheric Administration  
- www.ncdc.noaa.gov  
  National Climatic Data Center

### Maps/Aerial Photos

- www.usda.gov  
  Department of Agriculture (also plants and wildlife)  
- www.doi.gov  
  Department of the Interior (Coastal and Geologic Survey)

### Experts/Prior Testimony

- www.dauberttracker.com  
  expert evidence cases  
- www.expertpages.com  
  organized by topic and state  
- www.almexperts.com/expertwitness  
- www.hg.org  
  legal directories  
- www.trialsdigest.com/research/dlinfo.shtml  
  (fee service)  
- www.tasanet.com  
  Technical Advisory Service for Attorneys  
  Vocational Experts:  
  www.abve.net  
  www.rehabpro.org
### News and Media

- [www.factiva.com](http://www.factiva.com) - extensive news and business information
- [www.newspaperlinks.com](http://www.newspaperlinks.com) - http://newslink.org/menu.html

### Public Records (birth, death, marriage, etc.)

(See Investigative Resources, this exhibit)

- [www.knowx.com](http://www.knowx.com) - background public information about businesses, persons, assets

### Medical/Pharmacy

- [www.cdc.gov](http://www.cdc.gov) - U.S. Center for Disease Control
- [www.fda.gov](http://www.fda.gov) - U.S. Food and Drug Administration
- [www.ama-assn.org/laps/amahg.htm](http://www.ama-assn.org/laps/amahg.htm) - doctor finder
- [www.merck.com](http://www.merck.com) - Merck Manual of Diagnosis and Therapies
- [www.jdmd.com](http://www.jdmd.com) - medical abbreviations, medical and dental malpractice consultants, glossary

### Statistical Resources

- [www.fedstats.gov](http://www.fedstats.gov)
- [http://tracfed.syr.edu](http://tracfed.syr.edu)
- [www.nces.ed.gov](http://www.nces.ed.gov) - National Center for Education Statistics
- [www.scoi.com](http://www.scoi.com) - anatomical/orthopedic information
- [www.kumc.edu](http://www.kumc.edu) - University of Kansas medical information and links
- [www.rarediseases.org](http://www.rarediseases.org)
- [www.tbi.org](http://www.tbi.org) - information on traumatic brain injury
- [www.healthtouch.com](http://www.healthtouch.com) - prescription drugs
- [www.rxlist.com](http://www.rxlist.com) - prescription drugs

### Vehicle Value

- [www.kbb.com](http://www.kbb.com)

### Writing and Fact Resources

- [www.stands4.com/opau.asp](http://www.stands4.com/opau.asp) - guide to lists of acronyms, abbreviations, and initialisms
- [www.odci.gov/cia/publications/factbook](http://www.odci.gov/cia/publications/factbook) - world factbook
- [www.almanac.com](http://www.almanac.com) - Old Farmers Almanac
- [www.onelook.com](http://www.onelook.com) - multiple specialized dictionaries
- [http://convert.french-property.u.k./index.htm](http://convert.french-property.u.k./index.htm) - measurement units conversion tables
- [www.timezoneconverter.com](http://www.timezoneconverter.com)
- [www.thesaurus.com](http://www.thesaurus.com) - Roget’s Thesaurus
- [www.itools.com/research_it/research_it.html](http://www.itools.com/research_it/research_it.html) - dictionary, rhymer, translator, area codes, currency converter, others

(continued)
<table>
<thead>
<tr>
<th>Miscellaneous</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://www.fedex.com/us/tracking">www.fedex.com/us/tracking</a></td>
</tr>
<tr>
<td><a href="http://www.winzip.com">www.winzip.com</a></td>
</tr>
<tr>
<td>software for compressing large files or folders to disk</td>
</tr>
<tr>
<td><a href="http://www.ebay.com">www.ebay.com</a></td>
</tr>
<tr>
<td>searches can turn up illegally obtained or other useful physical evidence</td>
</tr>
</tbody>
</table>

EXHIBIT 3:2 General Resource Guide for Investigation on the Web (continued)
### Investigative Plan

**Possible to Prove or Acquire**

<table>
<thead>
<tr>
<th>Possible Source of Information</th>
<th>Method</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Defendant Dun’s Market Identifiers</td>
<td>Internet search</td>
<td>Professional search service</td>
</tr>
<tr>
<td>Mercury Express—financial status, service agent, home office, etc. Corporation Service Co.</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Breach of Duty

<table>
<thead>
<tr>
<th>Breach of Duty</th>
<th>Possible Source of Information</th>
<th>Method</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weather conditions</td>
<td>Certified copy of weather conditions from National Climatic Data Center</td>
<td>Mail/Internet</td>
<td></td>
</tr>
<tr>
<td>Mechanical defect</td>
<td>Inspection of vehicle</td>
<td>Hire mechanic</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Police report</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Vehicle maintenance records</td>
<td>Mail request</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mechanic who services vehicle</td>
<td>Phone/interview (deposition)</td>
<td></td>
</tr>
<tr>
<td>Condition of driver</td>
<td>Police report</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Police officer</td>
<td>Phone/personal interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Copy of breathalyzer report</td>
<td>Mail</td>
<td>Clerk of court file</td>
</tr>
<tr>
<td>Conditions at scene</td>
<td>Ms. Schnabel (witness)</td>
<td>Personal interview</td>
<td></td>
</tr>
<tr>
<td>Scene of accident</td>
<td>Visit scene (photograph)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Plaintiff’s Injuries

<table>
<thead>
<tr>
<th>Plaintiff’s Injuries</th>
<th>Possible Source of Information</th>
<th>Method</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Immediate injuries, broken bones, etc.</td>
<td>Doctors’ reports</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Emergency room records</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Hospital records</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>X-rays</td>
<td>Mail</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Doctors’ testimony</td>
<td>Interview, letter, reports evaluated</td>
<td></td>
</tr>
<tr>
<td>Immediate and long-term disabilities</td>
<td>Doctors’ reports (follow-up visits)</td>
<td>Mail</td>
<td>Interview (after reports evaluated)</td>
</tr>
<tr>
<td></td>
<td>Doctors’ testimony</td>
<td></td>
<td>Initial interview</td>
</tr>
<tr>
<td></td>
<td>Ms. Forrester</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mr. Forrester</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td>Nurse</td>
<td>Phone (followed by interview)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Friends</td>
<td>Phone (followed by interview)</td>
<td></td>
</tr>
<tr>
<td>Pain</td>
<td>Ms. Forrester’s testimony (pain log)</td>
<td>Initial and follow-up interviews</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mr. Forrester</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Nurse</td>
<td>Phone (follow-up interview)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Hospital and doctors’ reports</td>
<td>Mail</td>
<td>Interview</td>
</tr>
<tr>
<td></td>
<td>Doctors’ testimony</td>
<td>Phone</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ambulance assistants</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ms. Schnabel (witness)</td>
<td>Interview</td>
<td></td>
</tr>
</tbody>
</table>

### Comparative Negligence

<table>
<thead>
<tr>
<th>Comparative Negligence</th>
<th>Possible Source of Information</th>
<th>Method</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>Attentiveness of plaintiff (haste of plaintiff)</td>
<td>Police report</td>
<td>Mail</td>
<td>Mail (discovery)</td>
</tr>
<tr>
<td></td>
<td>Insurance and Mercury accident reports</td>
<td>Mail</td>
<td>Interview</td>
</tr>
<tr>
<td></td>
<td>Ms. Forrester</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mr. Forrester</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Ms. Schnabel</td>
<td>Interview</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Mr. Hart</td>
<td>Deposition</td>
<td></td>
</tr>
<tr>
<td>Obstruction of sight and sound by coat worn by plaintiff</td>
<td>Coat itself</td>
<td>Obtain from Ms. Forrester</td>
<td></td>
</tr>
<tr>
<td></td>
<td>Possible re-creation tests with coat at scene</td>
<td>(Suggestions from supervising attorney)</td>
<td></td>
</tr>
<tr>
<td></td>
<td>University consultant</td>
<td>Phone</td>
<td></td>
</tr>
</tbody>
</table>

*Note: This table is for illustrative purposes. It is not complete as to possible facts to prove, sources, or methods.*
Ms. Betty Noble  
Medical Records Librarian  
Good Samaritan Hospital  
4600 Church Street  
Legalville, Columbia 00000

Re: Medical Records of Ms. Ann Forrester  
1533 Capitol Dr., Legalville, Columbia 00000  
Birth date: 4/25/__

Dear Ms. Noble:
The firm of White, Wilson, and McDuff has been retained to represent the above-named individual. Enclosed is a current Authorization to Release Protected Health Information executed by our client. I request a copy of all of your medical records on Ms. Forrester. The enclosed authorization includes all Health Insurance Portability and Accountability Act requirements (45 CFR §164.508) as indicated below.

Core Elements:
(i) A specific and meaningful description of the information to be used or disclosed;
(ii) Your name (or facility's name) identifying you as the person(s), or class of persons, authorized to make the requested disclosure;
(iii) The name of the attorney and law office identifying us as the person(s), or class of persons, to whom the covered entity may make the disclosure;
(iv) A description of the purpose of the requested disclosure;
(v) An expiration date or event (with statement that neither has occurred); and
(vi) Signature of the patient and date (or signature of patient's personal representative and description of representative's authority to act for the individual).

Required Statements:
(i) The patient's right to revoke the authorization in writing plus any exceptions to the right to revoke and how to revoke the authorization;
(ii) The inability of you or your facility to condition treatment, payment, enrollment or eligibility for benefits on the signing of this authorization; and
(iii) The potential for information disclosed pursuant to the authorization to be subject to redisclosure by the recipient and no longer be protected by the privacy regulations.

Miscellaneous Elements:
(i) The authorization may not contain any material information that is false, and
(ii) An authorization for psychotherapy notes may not be combined with other types of authorization.

[Add any other state-specific requirements, e.g. some state statutes or regulations require medical records (or one complete copy) to be provided free.]

On receipt of the records, our firm will submit reasonable payment for any preparation fee.

Thank you for your assistance.

Sincerely,

Terry Salyer  
Paralegal

Enclosure: Authorization to Release Protected Health Information

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AUTHORIZATION TO DISCLOSE PROTECTED HEALTH INFORMATION

TO: (Health Care Provider/Address)
RE: (Client/DOB)

AUTHORIZED RECIPIENT: (Law Firm/Address) or its representatives.

RECORDS TO DISCLOSE [Pursuant to the Health Insurance Portability and Accountability Act, 45 CFR § 164.508 (and, where appropriate, cite any relevant state statute)]: ALL medical records including but not limited to: history, physical, dental, outpatient, inpatient, medication, laboratory, pathology, physical therapy and other rehabilitation, mental health, psychiatric (psychotherapy notes excepted), chemical dependency, HIV, billing, health insurance, Medicaid, and Medicare records; physician, nurse, progress, emergency and operating room orders, notes, and reports; discharge summary; and summary reports and films of X-rays, MRIs, and other scanning devices regarding my medical treatment rendered by you and all such information maintained in my medical file. [Although psychotherapy notes are not included in this request, please inform authorized recipient if such notes exist.]

PURPOSE: To authorize you to release all my medical information to my attorney for the purpose of civil litigation. You may rely on a photocopy of this authorization as if it were the original.

EXPIRATION: This authorization expires in [three years (or state date or event)] from the date of signature.

REVOCATION: I know I may revoke this authorization at any time by submitting a signed, written notice of revocation to the health care provider listed above and to my attorney.

REDISCLOSURE: I know the information disclosed pursuant to this authorization is subject to redisclosure by the authorized recipient and no longer protected under the Federal Privacy Rule.

FURTHER AUTHORIZATION: You are also authorized to speak confidentially with my law firm or any of its representatives and provide deposition and trial testimony.

CONDITIONS: I know treatment, payment, and enrollment or eligibility for benefits cannot be conditioned on whether I sign this authorization.

[client signature]
[If personal representative, sign and describe authority]
[date]
Albert Meyer, M.D.
Medical Arts Building
4650 Church St.
Legalville, Columbia 00000

Re: Ms. Ann Forrester, 1533 Capitol Drive, Legalville, Columbia 00000
Birthdate: 4/23/___

Dear Dr. Meyer:

Ms. Forrester has retained this office to represent her regarding injuries sustained from being struck by a van on February 26, ___. Ms. Forrester suffered multiple fractures of the pelvis and left leg, and also had spinal and internal injuries. As a result of these injuries, Ms. Forrester is currently bound to a wheelchair and may not be able to return to work for some time.

To assist Ms. Forrester, we would appreciate it if you would send us a report on the following:

1. Your diagnosis of Ms. Forrester’s mental, emotional, and physical injuries
2. Your opinion as to the cause of Ms. Forrester’s injuries
3. A description of the treatment given Ms. Forrester
4. Likely degree of pain and discomfort related to such injuries
5. Mental, physical, and emotional limitations as they relate to employment, recreational activities, and enjoyment of life
6. Future treatment needed
7. Prognosis
8. Likelihood of Ms. Forrester being able to return to work. If so, when?

In addition, please send an itemized bill for all your services related to these injuries.

The necessary authorization is enclosed. Upon receipt of your report, this office will promptly pay any preparation fee.

Please keep us informed regarding Ms. Forrester’s future visits to your office and any change in condition or prognosis.

Thank you for your cooperation.

Terry Salyer
Paralegal

Enclosed: Authorization to Release Protected Health Information

cc: Ms. Ann Forrester
Albert Meyer, M.D.
Medical Arts Building
4650 Church St.
Legalville, Columbia 00000

Re: Ms. Ann Forrester, 1533 Capitol Drive, Legalville, Columbia 00000
Birthdate: 4/23/__

Dear Dr. Meyer:

Your report of September 9, ___ on Ms. Forrester was very helpful. Six months have passed since that report, and we need an update. Please provide us with detailed information on the following:

[List those points where specific elaboration is needed beyond the first request. Add a catchall question asking for information on any new or otherwise significant developments.]

Please include copies of itemized bills for your services to Ms. Forrester since September 9. A copy of the appropriate authorization should be in your files.

Thank you again for your assistance.

Terry Salyer
Paralegal

cc: Ms. Forrester
EXHIBIT 3-8  Accident Scene Checklist

1. Nature of area: urban, rural, intersection, highway, school zone, other __________________________

2. Weather (if at scene soon enough to observe) ________________________________________________

3. Other conditions: visibility 
   - road surface ________________________________________________________________
   - lanes ________________________________________________________________
   - curves ________________________________________________________________
   - grade ________________________________________________________________
   - speed limit ________________________________________________________________
   - other ________________________________________________________________

4. Witness Position to view accident View, obstructions
   ____________________________________
   ____________________________________
   ____________________________________

5. Possible distractions that might cause inattention _____________________________________________

6. Measurements of critical distances
   - skid marks ________________________________________________________________
   - road width ________________________________________________________________
   - distance vehicle traveled after impact __________________________________________
   - distance from witness position to scene _______________________________________
   - other ________________________________________________________________

7. Traffic control
   - signs ________________________________________________________________
   - lane markings ________________________________________________________________
   - other ________________________________________________________________

8. Sun or other lighting conditions at time of day accident occurred
   - from plaintiff’s position _______________________________________________________
   - from defendant’s position _______________________________________________________ 
   - from witness’s position ________________________________________________________
   - other ________________________________________________________________

9. Temporary conditions
   - construction ________________________________________________________________
   - parked vehicles ________________________________________________________________
   - other ________________________________________________________________

10. Flow of traffic, same time of day, same day of week _______________________________________

   A handy formula for converting speed to distance (and vice versa) is mph × 1.5 = ft. per sec.

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11. All possible causes of accident _____________________________________________________________
________________________________________________________________________________________

12. Evidence of damage
   vehicles ___________________________________________________________
   signs _____________________________________________________________
   trees _____________________________________________________________
   buildings _________________________________________________________
   other ___________________________________________________________

13. Photograph and videotape important items noted above from different angles to show relevant conditions
   or defects such as a pothole in the street, uneven sidewalk, slippery spots, etc.

14. Carefully note pertinent directions (N, NE, E, SE, S, SW, W, NW) ______________________________

15. Locations of other possible witnesses regularly at the scene
   homes ___________________________________________________________
   businesses _______________________________________________________
   joggers __________________________________________________________
   dog walkers _____________________________________________________
   farm workers ____________________________________________________
   maintenance or public works people _________________________________
   other ___________________________________________________________

16. Other physical evidence relevant to case ___________________________________________________

17. Special needs
   expert to view scene _______________________________________________
   professional photographer to capture lighting, angles (good source: International Council of Evidence
   Photographers) ___________________________________________________
   aerial photograph _________________________________________________
   other ___________________________________________________________

18. Carefully preserve evidence.
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<thead>
<tr>
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<tbody>
<tr>
<td>1.</td>
<td>Date</td>
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<td>2.</td>
<td>Interviewer</td>
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<td>3.</td>
<td>Place</td>
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<td>4.</td>
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<td>5.</td>
<td>File No.</td>
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<td>6.</td>
<td>Type of Case</td>
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<td>7.</td>
<td>Full Name of Witness</td>
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<tr>
<td>8.</td>
<td>For Def.</td>
<td>Pltf.</td>
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<tr>
<td>9.</td>
<td>Summary of Statement</td>
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<td>10.</td>
<td>Availability</td>
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**BACKGROUND**

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<tr>
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<tbody>
<tr>
<td>11.</td>
<td>Address, City, County, State, Zip Code</td>
<td>Years at</td>
</tr>
<tr>
<td>12.</td>
<td>Alias/Maiden Name</td>
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(continued)
13. ____________  ____________  14. Citizen (______) (______)
       Home Phone    Work Phone
15. __________________________
       Yes       No
       Nationality/Race
16. ____________  17. ____________  18. ____________  19. __________________________
       Date of Birth    Age    Sex    If Minor, Guardian’s Name
20. __________________________
       Close Relative or Friend (Not Immediate Family)
21. __________________________
       Address/Phone
22. S.____M _____D _____W _____ Other____  23. __________________________
       Spouse’s Full Name
24. __________________________  25. __________________________  26. __________________________
       Spouse’s Address If Other Than 11.    Spouse’s Place of Employment    Phone
27. __________________________
       Spouse’s Job Title
28. __________________________
       Children’s Names, Ages, Addresses (other than 11)
29. List other marriages on back.

**EMPLOYMENT**

30. __________________________
       Witness’s Employer    Address    Job Title
31. __________________________  32. __________________________  33. __________________________
       Supervisor    Phone    Date Started Employment
34. Other Jobs: Employer/Address/Phone/Supervisor/Dates/Job Title
   a. __________________________
   b. __________________________
   c. __________________________
35. Education: School/Address/Degree or Diploma/Date
   a. H.S  __________________________
   b. Voc.  __________________________
   c. Coll.  __________________________
   d. Grad.  __________________________
   e. Other  __________________________
36. Experience as Witness    (______)    (______)    ____________    ______________    ___________________
       Yes       No        Date        Location        Type of Case
37. Ever been convicted of fraud, theft, or other dishonesty? Give details.  
   __________________________
   __________________________
   __________________________
   __________________________
   __________________________
   __________________________

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1. Complete Witness Information Cover Sheet.
2. Identify taker of statement, time, date, place.
3. Witness’s activity just prior to accident: location time date
   - witness’s activity
   - view of scene
   - distance from scene
   - obstruction
   - location of plaintiff and defendant
   - activity of plaintiff
   - activity of defendant
   - others present
   - names
   - their location
   - activities
   - other possible witnesses
   - others in vehicle
   - key issue questions
4. Setting at time of accident:
   - time
   - weather
   - lighting conditions
   - road conditions
   - wind
   - unforeseen obstructions (repair work, children, animals, fallen trees or rocks, etc.)
   - dangerous conditions
   - traffic flow
   - speed limits
   - traffic signs
   - school zone
   - intersection
   - type of road
   - hills
   - curves
   - shoulders
   - any unusual or particularly notable activity of parties or others (recklessness, inattentiveness, evidence of influence of alcohol or drugs, etc.)
   - speed of vehicles
   - distance between plaintiff and defendant
   - vehicle window obstructions
   - other conditions of importance
   - when witness’s attention first drawn to plaintiff and defendant
   - other key issue questions
5. The accident:
   - time
   - general description of sequence
   - attempt to evade (sound horn, brake, head for shoulder, etc.)
   - skidding
   - sounds of contact
   - detailed description of what happened to plaintiff and defendant (thrown from car, hit windshield, fell, etc.)
   - detailed description of what happened to vehicles
   - exact point of contact
   - exact position of parties at time of contact
   - position of other people
   - opinion as to cause of accident
   - diagram
   - other key issue questions
6. Setting after accident:
   - witness’s description of scene (diagram)
   - position of plaintiff and defendant
   - position of vehicles
   - injuries and damage (persons and property)
   - description of sequence of events after accident
   - time of arrival and activity of all emergency personnel
   - care rendered at scene to injured
   - other persons and witnesses present after accident, including reporters, photographers, investigators
   - cleanup activities (name of tow truck)
   - who, if anyone, made or recorded statements
   - conversations overheard (parties, witnesses, emergency personnel, etc.)
   - opinion as to truthfulness and character of parties and witnesses
   - witness’s record of character and honesty
   - any conversation with any of the parties since accident about accident or injuries
   - other key issue questions
7. Record statement and have witness read, sign, and date it.
8. Check to see if witness made statements about the accident to anyone else. If so, to whom and what kind (oral, written, recorded)?
9. Assess witness’s abilities
   - voice
   - sincerity
   - power of observation
   - confidence
   - appearance
   - appreciation of importance of truthfulness
   - recognition of evidence, persons, photos, etc.
   - objectivity
   - truthfulness
   - vulnerability to impeachment
   - willingness to testify
   - availability for trial
EXHIBIT 3:12 ■ Witness Location Sketch

- **Witness Location Sketch**

- **Scale** 1" = 20'

- **Measurement** by cloth tape

- **Ven #1** - R. Jones

- **Ven #2** - D. Baker

- **Witnesses**:
  1. **Driver** - R. Jones
  2. **Driver** - B. Baker
  3. **Pedestrian** - K. Walker
  4. **Resident** - E. Ames
  5. **Policeman** - A. Spade

- **Sketch by As Investigator**
  5-4-87

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EXHIBIT 3:13  ■ Basic Scene Sketch

SKETCH BY ALL INVESTIGATOR
5-4-27
SCALE 1" = 20'
MEASUREMENT BY CLOTH TAPE
VEH #1 - R. JONES
VEH #2 - B. BAKER

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