

IN THE CIRCUIT COURT OF THE
11TH JUDICIAL CIRCUIT, IN AND
FOR DADE COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

BELINDA CAMPBELL,

Plaintiff,
vs.

NCL (Bahamas) L.T.D. d/b/a NCL

Defendant.

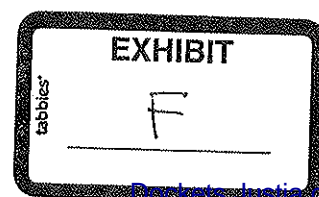
CASE NO: - 13095 GA 25

RESPONSE DUE: 6-13-2011

PLAINTIFF'S INITIAL REQUEST FOR PRODUCTION TO NCL

COMES NOW, Plaintiff, BELINDA CAMPBELL, by and through the undersigned counsel, and files his First Request for Production to the Defendant, NCL (Bahamas) L.T.D. d/b/a NCL, to produce the following within the manner and time prescribed by the Florida Rules of Civil Procedure.

1. The entire personnel file of the Plaintiff, including without limitation, all applications for employment, all reports concerning his work performance, all correspondence which refers to the Plaintiff, all contracts of the Plaintiff, all physical examinations of the Plaintiff and any other document contained in Plaintiff's personnel file or referred to therein.
2. All ship board medical records and log book entries referring to or concerning Plaintiff.
3. All shore side medical records concerning Plaintiff.
4. All statements of the Plaintiff.



5. All statements of any witnesses.
6. All diagrams, drawings, and general arrangement plans and blueprints of the area where the Plaintiff alleges he was injured.
7. All photos and videos of the accident scene, boxes/ exemplary boxes involved in the subject accident or anything having to do with the subject accident.
8. All accident or incident reports regarding Plaintiff.
9. All photographs of Plaintiff taken either before or after the subject accident.
10. All pay records for the plaintiff during his employ with the defendant.
11. Copies of any and all materials used in the training and drill of crewmembers on the subject vessel with respect to fire drills.
12. Copies of all internal manuals and external manuals pertaining to the subject vessel as described in Section 11 (Safety Management System Manuals) of the ISM Code.
13. Copies of the Table of Contents of each Section 11 office and shipboard manuals.

14. Copies of all manuals describing hazard analysis and/or risk assessment policies and procedures pertaining to the subject vessel.
15. Copies of the written response from the Designated Person to the Master on duty at the time of the subject accident.
16. Copies of any and all documents that support each of the Defendant's affirmative defenses.
17. Copy of IMO required Safety Management Manual.
18. Copies of all correspondence and any other documents submitted to or received by the United States Coast Guard with regard to the subject incident, including but not limited to the Form 2692.
19. Copies of all Defendant's written information or policies that describe the title, duty, role, and responsibility of Plaintiff's job title at the time of the subject incident.
20. Copies of any and all job hazard analyses relating to lifting by crewmembers on the subject vessel.
21. Copies of all draft and final non-conformity reports pertaining to the subject accident.

22. All written rules, policies, procedures, guidelines, instructions and/or directives pertaining to lifting by crewmembers of the subject vessel.

PRIVILEGED ITEMS

With respect to any documents or items for which work product and/or attorney client privilege is claimed, please provide a list of items denoting date of preparation, type of item and the name address, job title employer for the person preparing the item and for each present custodian of same. Also submit the items in a sealed envelope to the Court for an in camera inspection.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served along with the Complaint and Summons upon the registered agent of the above mentioned Defendant.

Dated: 4/22/2011

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BELINDA CAMPBELL

By, 

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