

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF ILLINOIS

WENDY WALDEN, Plaintiff,)	
)	
)	
v.)	Case No.: 3:16-cv-01216-NJR-RJD
)	
PIER I IMPORTS (U.S.), INC., and)	
HEIDI HOLTGREWE,)	
Defendants.)	

PLAINTIFF'S RESPONSE TO DEFENDANTS'
FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF

COMES NOW Plaintiff WENDY WALDEN responding to Defendants' request to produce as follows:

1. Please produce all documents identified in Plaintiff's Answers to Defendant's First Interrogatories.

RESPONSE: Plaintiff previously produced all of the following to Defendants:

- Medical records and billing statement from Belleville Memorial Hospital-ER
- Billing statement from CEP America Illinois LLP
- Billing statement from Clinical Radiologists, S.C.
- Medical records and billing statement from Memorial Medical Group-Dr. Julie Buchner, M.D.
- Medical records and billing statement from Belleville Memorial Hospital-X-Ray
- Medical records and billing statement from Belleville Memorial Hospital-MRI
- Medical records and billing statement from Gateway Neurology-Dr. Stephen Burger, M.D.
- Billing statement from Belleville Memorial Hospital-Labs (5/27/15)
- Medical records and billing statement from Belleville Memorial Hospital-Dr. Mark Freeman, M.D.
- Medical records and billing statement from Belleville Memorial Hospital-Labs (6/19/15)
- Medical records and billing statement from Beltline Chiropractic, Ltd.
- Billing statement from Radiology Consultants/Midwest
- Photograph of the chair that struck Plaintiff's head

2. Please produce all documents reviewed or otherwise used by you in answering Defendant's First Interrogatories.

RESPONSE: None other than those listed in response 1.

3. Please produce all documents, photographs and recordings that Plaintiff possesses regarding or relating to the allegations in the Complaint.

RESPONSE: Plaintiff previously produced one photograph of the chair which fell on her as alleged in the Complaint.

4. Please produce all documents maintained or created by you, and/or created by another person or entity, of which you have copies or to which you have access, reflecting or relating to the allegations contained in your Complaint, including, but not limited to all diaries, journals, calendars, notes, e-mail communications and attachments, compact disks and photographs.

RESPONSE: Plaintiff was advised by Beltline Chiropractic to keep a headache journal; Plaintiff will supplement this response by providing a copy of same; otherwise, none other than those contained in Plaintiff's medical records and privileged conversations and correspondence between Plaintiff and her attorneys.

5. Please produce all documents and/or communications reflecting any item of damages which you claim resulted from the actions of Defendants, including, but not limited to doctor, counselor, psychologist/psychiatrist, and hospital bills; attorney's fee statements; and attorney engagement letters of representation.

RESPONSE: Plaintiff previously produced medical bills and records as stated in response 1. Plaintiff asserts the legal representation agreement between Brown & Brown LLP and her is privileged and irrelevant.

6. Please produce all documents and/or communications between you and another person in connection with this matter.

RESPONSE: Plaintiff previously produced medical bills and records as stated in response 1. Plaintiff asserts any correspondence between Plaintiff and her attorneys is privileged.

7. Please produce all documents, other communications, or other tangible things obtained from another person in connection with this matter.

RESPONSE: None know to Plaintiff, other than that previously produced.

8. Please produce all documents or other tangible items included on your mandatory disclosures pursuant to the Court's Order and any supplemental mandatory disclosures.

RESPONSE: Plaintiff has previously produced these items to Defendants.

9. Please produce copies of all documents or other tangible items that you intend to use at trial in this matter.

RESPONSE: Plaintiff has previously produced these items to Defendants. Plaintiff will supplement these items, if necessary.

10. Please produce copies of all documents or other tangible items that you, or someone acting on your behalf, provided to any retained or non-retained expert witness. Also produce copies of all things received by you, or received by someone on your behalf, from any retained or non-retained expert witness.

RESPONSE: None known to Plaintiff, other than those contained in her medical records.

11. Please execute and return the attached medical release forms.

RESPONSE: Plaintiff has provided HIPAA forms for the medical providers which are listed in response 1.

12. Complete copies of all federal and state tax returns filed by Plaintiff for the past five (5) years.

RESPONSE: Plaintiff will supplement this response, if relevant, as Plaintiff is not claiming lost wages or lost earning capacity.

13. Copies of all postings by you on any internet site, including any internet social networking site, including, but not limited to, Facebook, MySpace, YouTube, Instagram and Twitter, concerning the allegations in the Complaint.

RESPONSE: None known to Plaintiff.

14. Copies of all documents or communications exchanged with or received from media or news agencies regarding the allegations contained within the Complaint.

RESPONSE: None known to Plaintiff.

15. Please produce all photographs, videotapes, or movies with respect to the scene of the occurrence mentioned in the Complaint or the injuries alleged in the Complaint.

RESPONSE: See response 3.

16. Please produce all documents produced by Defendant in any other lawsuit, hearing or proceeding, or obtained from any other source, or any transcripts of testimony of Defendant's representatives, which Plaintiff will claim are relevant to any issue in this action.

RESPONSE: None known to Plaintiff at present.

17. Please produce all written or recorded statements have been obtained from any persons related to the allegations contained within the Complaint.

RESPONSE: None known to Plaintiff, other than those contained in her medical records.

WENDY WALDEN

By: /s/Kenneth B. Beljanski

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing was sent via email on

March 3, 2017 to the following:

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