



## DISCOVERY REQUEST TEMPLATE

IN THE DISTRICT COURT OF \_\_\_\_\_ COUNTY, [STATE]

[PLAINTIFF NAME],

Plaintiff,

v. Civil Action No. \_\_\_\_\_

[DEFENDANT NAME],

Defendant.

\_\_\_\_\_

PLAINTIFFS FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION

\_\_\_\_\_

TO: [Defendant Name / Hospital / Physician], by and through counsel of record

Pursuant to [state rules of civil procedure], Plaintiff requests the following within [30] days of service.

### DEFINITIONS

"Medical Record" means any clinical documentation, including EMR, handwritten notes, imaging, lab results, and any audit trails.



## A. INTERROGATORIES

1. Please identify all health care providers who examined, treated, or consulted on the Plaintiff from [Date] to [Date].
2. State the dates and nature of care provided by each.
3. State whether any internal incident or quality assurance reviews were conducted.

## B. REQUESTS FOR PRODUCTION

1. Complete and unaltered medical records (including nurse's notes, orders, consults, radiology, labs, medication admin records) from [Facility Name] for dates [Date Range].
2. Copies of all consent forms signed by Plaintiff.
3. Policies and procedures relevant to [e.g., fall prevention, documentation standards] at the time of the incident.
4. Provider credentialing files and privilege information.
5. Incident reports or internal memos related to Plaintiff's care.

Respectfully submitted,

Sandy Harman, DNP, AGACNP-BC, ENP-BC, FNP-BC, LNC

Legal Nurse Practitioner Consultant

(972) 833-6275 | [sandyharman@coremedlegalconsulting.com](mailto:sandyharman@coremedlegalconsulting.com)