

Instructions for Personal Injury Clients

In order to maximize the monetary recovery in your case, you must do certain important things to assist me with the proper presentation of your case. These are as follows:

- 1. Photographs:** Take photographs of your damaged automobile and/or injuries (bruises, cuts, etc.). A photo is worth a thousand words!
- 2. Communication:** Do not talk to anyone about your claim—especially the other driver’s insurance adjuster or attorney.
- 3. Diary:** Keep a daily diary! If there are days you feel fine, it is all right to state that fact. Type or print your diary so that it is legible and can be used as evidence.
- 4. Witnesses:** Make a list of the names, addresses and phone numbers of all witnesses. Write out what you believe each witness will say on your behalf.
- 5. Bills:** Bring me a copy of all bills (doctor, hospital, physical therapy, receipts for prescriptions, etc.). Also, bring me a list of all bills that *you* have paid.
- 6. Insurance Policies:** Bring in all auto insurance policies which you believe may provide insurance coverage for you, other injured parties, or damaged property. Include the Declarations Page which lists the “Schedule of Coverages.”
- 7. Other Attorneys You Have Consulted:** You *must* provide me with the names and addresses of any other attorneys which you have consulted so that I can determine what you owe them, if they have a lien, or if you have signed a fee contract with them.
- 8. Complete the Personal Injury Worksheet:** Completely fill out the Worksheet and return it to me as soon as possible.
- 9. Tax Returns:** If you claim lost wages, you will be asked to provide your last three years’ tax returns (State and Federal) and recent pay stubs.
- 10. Previous Injuries:** It is important to disclose to me all of your previous injuries, illnesses and physical problems regardless of whether you feel they are important or not.
- 11. Estimates:** Obtain a copy of all damage estimates.
- 12. Review Previous Statements:** Prior to trial, read all of your medical records and reports, any statements you have given, police reports and your sworn Answers to Interrogatories.
- 13. Chiropractors:** If you have seen any chiropractors, be sure to provide me with their names, addresses and the dates that you saw them and the reason for the visit.
- 14. Visits to Medical Providers:** Make a list of all visits to all medical providers, including the date of your visit, purpose for such visit, and the round-trip mileage to and from the medical provider. Also, include any wage loss as a result of going to your doctors.