

IN THE IOWA DISTRICT COURT FOR _____ COUNTY

Plaintiff, Plaintiff, v. Defendants, Defendants.	LACV _____ PLAINTIFF'S RULE 1.500(1) INITIAL DISCLOSURES
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COMES NOW Plaintiff, by and through their attorney of record and hereby provides their initial disclosures pursuant to Rule 1.500(1) of the Iowa Rules of Civil Procedure:

1. PARTIES LIKELY TO HAVE DISCOVERABLE INFORMATION

Name	Address	Phone	Email	Subject Matter/ Summary of Facts/Opinions

2. DOCUMENTS, ELECTRONICALLY STORED INFORMATION, OR TANGIBLE THINGS IN PLAINTIFF'S POSSESSION, CUSTODY OR CONTROL WHICH MAY SUPPORT ITS CLAIMS OR DEFENSES

a. **Items Produced with Disclosure:**

Item Description

b. Items Not Produced with Disclosures

Item Description	Category	Location of Item	Name/Address of Item Custodian	Reason Item is Not Being Produced

3. DAMAGES

a. Reasonable value of medical services:

Provider	Charge

b. Property damages:

Towing costs	
Reasonable cost of repairs	
Reasonable value of the use of the vehicle during time required to complete repairs or obtain replacement	

c. Non-economic damages:

Reasonable value of past physical and mental pain and suffering	
Reasonable value of past loss of function of the mind and body	
Reasonable value of future physical and	

mental pain and suffering	
Reasonable value of future loss of function of the mind and body	

4. DISCLOSURES SPECIFIC TO PERSONAL/EMOTION INJURY CLAIMS:

- a. Full name;
- b. Date of Birth;
- c. Medicare Health Insurance Claim Number (HICN);
- d. Medical providers, facilities, pharmacies for five years prior to the date of the injury:

Facility/Provider/Pharmacy	Address

- e. See attached executed *Authorization to Release Information* for medical records.

5. DISCLOSURES SPECIFIC TO LOST TIME/EARNING CAPACITY CLAIMS:

- a. See attached federal and state income tax returns for five years prior to the date of these disclosures.
- b. See attached executed *Authorization to Release Information* for personnel records.

/s/ Attorney Signature
 Name, Attorney Number
 Firm
 Address
 Phone
 Fax
 Email

ATTORNEY FOR PLAINTIFF