

1983 Case Checklist:

1. Statute of Limitations _____ Satisfied?
2. Tort Claim Notice Deadline _____ Satisfied?
3. Client Intake Form
4. Client Engagement Agreement
5. Medical and Employment Authorization
6. Get full provider list from client(s)
7. Get list of heart/flowers witnesses
8. Send Letter of Rep to Ins. Company or File Ins. Claim
9. Request medical records / employment information
10. Send Tort Claims Notice
11. Check service 15 days after sending and every week until we get service. If no service in 45 days need to bring to attorney's attention
12. File initial pleadings (90 days after service of TCN)
 - Complaint
 - Appearance
 - Summonses
13. Send courtesy copy to insurance company or any adjusters who have contacted us
14. Check service 15 days after filing and every week until we get service. If no service in 45 days need to bring to attorney's attention
15. Answer from Defendant(s) due in 23 days after service. Received?
16. Send discovery requests to Defendant(s) as soon as Answer filed. Follow up on responses after 60 days Date:
 - Regular
 - Expert

- Affirmative Defense

17. Send medical records to attorney as soon as Answer is filed (keep track of what is sent so we know if we need to supplement)

18. Once Answer filed, send draft CMO to opposing counsel and file praecipe for hearing to get trial dates – **NOT IF REMOVED TO FEDERAL COURT**

19. After discovery responses received schedule deposition of defendant.

20. Send Demand Letter within 1 year of filing.

21. If client is still treating medical records every 6 months

22. Complete depositions

23. Schedule mediation after depositions completed

- Name of Mediator _____

- Date of Mediation _____

- **If federal, the Magistrate is the Mediator and Settlement Conference replaces a mediation.**

24. Update liens 30 days prior to mediation/settlement conference

25. Mediation binder 2 weeks prior to mediation/settlement conference