

PERSONAL INJURY- A. WALDRON

Description of case:

SOL:

Satisfied:

1. Client Intake Form:
2. Client Engagement Agreement:
3. Medical and Employment Authorization:
4. Obtain copy of Police Report:
5. Get full provider list from client(s):
6. Get list of heart/flowers witnesses:
7. Send Letter of Rep to Ins. Company or File Ins. Claim:
8. Request medical records / employment information / insurance ledger:
9. Begin expense summary and update as records come in:
Date Last Updated:
10. All medical records received?
11. Medical chronology/Summary of Injuries:
12. File initial pleadings:
 - 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:

16. Send discovery requests to Defendant(s) as soon as Answer filed. Follow up on responses after 60 days: Date Sent:

- Regular
- Expert Date Received:
- Affirmative Defense

17. Non-Party Request for Claims File:

18. Discovery Requests Received from Defendant(s):
Date Received:

Date Due:

Responses Served:

19. 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):

20. Once Answer filed, send draft CMO to opposing counsel and file praecipe for hearing to get trial dates:

21. Calendar CMO dates:

22. After discovery responses received schedule deposition of defendant:

23. Obtain experts and opinions:

24. Send Demand Letter within 1 year of filing:

25. If client is still treating update medical records every 6 months:
Last Follow-up date:

26. Schedule mediation after depositions completed:

27. Update liens 30 days prior to mediation:

28. Mediation binder 1 week prior to mediation: