



DELIVERING STRATEGIC SOLUTIONS ACCA'S 2000 ANNUAL MEETING

LITIGATION PLAN OF ACTION

DATE:

CLAIM

POLICY

CASE CAPTION:

HANDLING ATTORNEY:

CASE WORKER:

THRESHOLD: Y/N TYPE:

FACTS:

LIABILITY ANALYSIS:

DAMAGES ANALYSIS:

POA / ANTICIPATED DISCOVERY AND ESTIMATED COMPLETED DATE OF DISCOVERY:

*Attach Checklist or Narrative POA

EXHIBIT "A"

PLAN OF ACTION (POA)

I. ADDITIONAL INVESTIGATION NEEDED FROM CLAIMS AND THE ANTICIPATED DATE OF COMPLETION

(In this space, the attorney would provide a narrative detailing the further investigation to be conducted by claims and the completion date. The completion date can be an actual date or a general time such as "prior to plaintiff's deposition"; "prior to answer"; etc.)

II. DISCOVERY ANTICIPATED BY HOUSE COUNSEL ATTORNEY AND THE ANTICIPATED DATE OF COMPLETION

(This is essentially the counterpart to the above. Here, the attorney would list the discovery he/she anticipates conducting with an actual completion date.)

EXHIBIT "A"

ACTION PLAN DISCOVERY AND INVESTIGATION TARGET RESPONSIBILITY

DATE HC/CCW

SECURE PLAINTIFF'S ANSWERS TO HC

INTERROGATORIES/BILL OF PARTICULARS

SECURE CO - DEFENDANT'S ANSWERS TO HC INTERROGATORIES/BILL OF PARTICULARS

SECURE COPY OF PLAINTIFF'S DECLARATION HC

PAGE

SECURE INSURED'S ANSWERS TO HC

INTERROGATORIES

OBTAIN PLAINTIFF'S PIP/MED PAY FILE HC

OBTAIN PLAINTIFF'S WORKER'S HC

COMPENSATION FILE

PLAINTIFF'S MEDICAL RECORDS HC

PLAINTIFF'S EMPLOYMENT RECORDS HC

DEPOSITION OF PLAINTIFF(S) HC

DEPOSITION OF EYE WITNESS(ES) HC

REMOVE CASE FROM ARBITRATION HC

FILE MOTION FOR SUMMARY JUDGEMENT HC

SECURE ENGINEER'S OR ACCIDENT

RECONSTRUCTIONIST'S EVALUATION

SECURE AND FORWARD MRI FILMS,

X -RAYS ETC. TO EXPERT

SCHEDULE IME

POLICE REPORT CCW

ORIGINAL PHOTOS OF DAMAGED VEHICLES CCW

OBTAIN CIB ON PLAINTIFF(S) CCW

MRI OR SS OF INSD. CLMTS, AND WITNESSES CCW

ORIGINAL PHOTOS OF ACCIDENT SCENE CCW

OBTAIN MEDICAL AUTHORIZATION FROM CCW

PLAINTIFF ORIGINAL PHOTOS OF CLAIMANT'S SCAR CCW

EXHIBIT A

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