

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI  
AT INDEPENDENCE**

TAMMY WHEELER and )  
TRACI WHEELER (by her next friend )  
and mother, TAMMY WHEELER) )

Plaintiffs, )

v. )

Case No. 05CV07444

WHITE CONSOLIDATED, LTD )  
LIMITED PARTNERSHIP, )

Defendant. )

**PLAINTIFF'S REVISED FIRST REQUEST FOR PRODUCTION TO  
DEFENDANTS**

Plaintiff Tammy Wheeler propounds the following request for documents and things upon defendant, pursuant to Missouri Rules of Civil Procedure, to be answered within 45 days from the date of service of process of the petition.

1. All insurance agreements that will indemnify you in whole or in part for all claims made against you in this cause of action.

**RESPONSE:**

2. All documents identified by you in your responses to Plaintiff's Interrogatories to Defendant.

**RESPONSE:**

3. All medical records and bills relating to care provided to plaintiff.

**RESPONSE:**

4. All reports, notes, correspondence, and documents relied upon by any person that you intend to provide expert testimony at the trial of this matter.

**RESPONSE:**

5. All photographs of vehicles involved in the collision that is the cause of this action.

**RESPONSE:**

6. All photographs or videotape in your possession of plaintiff.

**RESPONSE:**

7. All statements of witnesses to the accident involving the plaintiff and your vehicle on July 6, 2004.

**RESPONSE:**

8. All documents evidencing damage to any of the vehicles involved in the collision on July 6, 2004 involving plaintiff.

**RESPONSE:**

9. All documents that support any affirmative defenses asserted by you.

**RESPONSE:**

10. All statements given by the plaintiff, notes regarding conversations with plaintiff, memos memorializing conversations or statements given by plaintiff.

**RESPONSE:**

11. All correspondence from plaintiff to you or to your insurance agent regarding the crash on July 6, 2004 or any injuries suffered as a result of the July 6, 2004 crash.

**RESPONSE:**

HENNING & BOUGH, P.C.

By \_\_\_\_\_  
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ATTORNEYS FOR PLAINTIFF