

With respect to the above claim(s) the claimant requests copies of and/or preparation of the following writings, now in Respondents possession, custody, or control or which come into your possession, custody or control in the future, to be provided to the Claimant's attorney within 20 days of receipt by respondent of this entry of appearance:

1. Wage Statement. Enclosed is a wage statement form for your convenience.
2. Itemization of fringe benefits together with the cost to the employer of each benefit provided to the employee, including without limitation, hospitalization, dental, medical, major medical, disability insurance (long term and/or short term), life insurance and/or employer's contribution to pension and/or profit sharing or similar kinds of programs.
3. List of all bonuses – Christmas or otherwise, provided to the claimant within one (1) year before or one (1) year after the date of each accident.
4. Pursuant to the Director's Rule 51-3-11, advise the amount you claim the claimant's average weekly wage to be and indicate your contentions as to the amount of each part thereof, i.e., average weekly straight time earnings, average weekly overtime earnings and "additional compensation".
5. All medical information concerning claimant, including dispensary and/or nurses' notes and/or first aid station notes, or any medical records maintained by the employer.
6. Pursuant to K.S.A. 44-515, provide copies of both all existing records and all records or writing that come into your custody or possession in the future concerning claimant that relates to the physical or mental condition, any health or medical condition, information concerning vocational rehabilitation reports, reports from medical management vendors or their employees.
7. Provide any and all reports resulting from examination of claimant by medical experts chosen by the respondent or insurance carrier or the Workers' Compensation Fund.

Shows a pattern of my reliance on my lawyer, who controlled discovery and confined the case to workers' compensation, delaying discovery of other legal rights and supporting equitable tolling.