

STATE OF NEW YORK

SUPREME COURT COUNTY OF [Insert County]

\_\_\_\_\_  
[Insert Caption]

Plaintiff,

vs.

Defendant.  
\_\_\_\_\_

PLAINTIFF’S COMBINED DISCOVERY

DEMANDS

AND NOTICE FOR DISCOVERY AND

INSPECTION IN MEDICAL

MALPRACTICE CASE<sup>1</sup>

Index No:

RJ No:

**COMBINED DISCOVERY DEMANDS**

To: Defendant {Insert Name of Defendant}

**NOTICE TO PRODUCE**

**PLEASE TAKE NOTICE**, that the undersigned demands that you produce, within twenty-one days from the date of service hereof, at the offices of \_\_\_\_\_, \_\_\_\_\_, for copying, testing or photographing by the plaintiffs, or someone acting on the plaintiffs’ behalf, the following **original** documents or items that are in the possession, custody or control of said defendant:

**Definitions**

1. “Document” includes images, applications summaries, data, electronic mail, compilations, and information of any kind or description however made, produced, or reproduced, or stored whether by hand or by any electronic, photographic, magnetic, optical, mechanical, computer, or other process technology. A document can take the form of any medium on which information can be stored, including without limitation, computer memory, computer disk, film, paper, tape

\_\_\_\_\_  
<sup>1</sup> This is a broad notice for discovery and inspection for medical malpractice contained within a standard notice of combined demands. The notice must be tailored to fit a particular case, as it is unlikely (but possible) that all of the items requested would present in any specific case.