

STATE OF NEW YORK

SUPREME COURT COUNTY OF [INSERT]

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[INSERT]

Plaintiff

Index No: [INSERT]

RJI No: [INSERT]

vs.

Hon. [INSERT]

[INSERT]

Defendant

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**NOTICE TO ADMIT ON BUSINESS RECORDS\***

To: (1) Defendant [Insert] Hospital, and  
(2) Defendant [Insert] M.D.  
separately and individually

PLEASE TAKE NOTICE, that, pursuant to CPLR 3123, you are hereby requested to admit the truth of any matters set forth in this request within 20 days after service of this notice.

1. The attached Exhibit "A" is a true and accurate copy of the original medical record of the plaintiff [Insert] at the offices of [Insert Treating Doctor 1 Name] at [Insert Address].
2. The records attached as Exhibit "A" were made in the regular course of [Insert Treating Doctor 1 Name] business.
3. It was the regular course of [Insert Treating Doctor 1 Name] business to make the records attached as Exhibit "A" at the time of the acts, transactions, occurrences and events contained in such records, or within a reasonable time thereafter.

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\* This notice to admit pertains to the medical records of an infant plaintiff's treating physicians. It is equally applicable to other business records which require authentication before trial under CPLR 4518(a). The Notice to Admit can assist in laying the appropriate foundation for out of state records, and may obviate the need for a records custodian to appear in court.

4. The attached Exhibit "B" is a true and accurate copy of the original medical record of the [Insert Plaintiff Name] at the offices of [Insert Treating Doctor 2 Name] [Insert Treating Doctor 2 Address].
5. The records attached as Exhibit "B" were made in the regular course of [Insert Treating Doctor 2 Name] business.
6. It was the regular course of [Insert Treating Doctor 2 Name] business to make the records attached as Exhibit "B" at the time of the acts, transactions, occurrences and events contained in such records, or within a reasonable time thereafter.
7. The attached Exhibit "C" is a true and accurate copy of the original medical record of the [Insert Treating Plaintiff Name] infant at the offices of [Insert Treating Doctor 3 Name] [Insert Treating Doctor 3 Address].
8. The records attached as Exhibit "C" were made in the regular course of [Insert Treating Doctor 3 Name] business.
9. It was the regular course of [Insert Treating Doctor 3 Name] business to make the records attached as Exhibit "C" at the time of the acts, transactions, occurrences and events contained in such records, or within a reasonable time thereafter.

Dated: [Insert Date]

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[Name of Attorney]  
[Name of Law Firm]  
Attorneys for Plaintiffs  
[Address]  
[Telephone Number]