

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

TONY WEBSTER and)	
VICKEY WEBSTER ,)	
)	
Plaintiffs,)	
)	
v.)	Case No. _____
)	Division: _____
UNITED VAN LINES, LLC,)	
)	
and)	
)	
HUTCHCRAFT VAN SERVICE, INC.,)	
)	
and)	
)	
MICHAEL T. WATSON,)	
Serve: 4710 80th St. North)	
St. Petersburg, FL 33709)	
)	
Defendants.)	

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT MICHAEL T. WATSON**

Plaintiffs propound the following First Request for Production of Documents pursuant to Rule 58 of the Missouri Rules of Civil Procedure. Plaintiffs request that defendant produce for inspection and copying the documents requested herein within forty-five (45) days of service of this request.

1. All documents identified in response to any of plaintiffs' first interrogatories directed to defendant.

2. A report made by anyone to the police, state highway patrol, sheriff, Interstate Commerce Commission, Public Service Commission of Missouri or any other state, Department of Motor Vehicles of Missouri or any other state, Missouri Highway & Transportation Commission or any other law enforcement or public official or regulatory

agency, or any report made by such officials concerning the incident stated in plaintiffs' petition.

3. All photographs, motion pictures or other visual reproductions of the incident, the scene of the incident, the vehicles involved or of plaintiff Tony Webster.

4. All written, recorded or preserved statements from any person having or purporting to have knowledge or information regarding the incident described in plaintiffs' petition (or alternatively, any such statements which you do not consider to be work product).

5. All drawings, graphs or charts of the scene of the incident described in plaintiffs' petition.

6. All shipping documents, freight manifests or contracts relating to the goods being carried on the vehicle operated by defendant Michael T. Watson at the time and place of the incident described in plaintiffs' petition.

7. All agreements, receipts, work orders or similar writings which evidence or describe any repairs or service to the vehicle being operated by defendant Michael T. Watson at the time and place of the incident described in plaintiffs' petition, during the sixty (60) days immediately preceding the incident.

8. Any diaries or log books kept by defendant Michael T. Watson during the trip on which the incident described in plaintiffs' petition occurred and during the preceding sixty (60) days.

9. Any diaries or log books kept by any co-driver of defendant Michael T. Watson during the trip on which the incident described in plaintiffs' petition occurred and during the preceding sixty (60) days.

10. Any written agreement or arrangements between defendants Michael T. Watson, United Van Lines, LLC, and/or Hutchcraft Van Service, Inc. concerning the use of the tractor trailer unit being operated by defendant Michael T. Watson at the time of the incident described in plaintiffs' petition.

11. All training documents including, but not limited to, all photographs, slides, motion pictures or videotapes provided to defendant Michael T. Watson by defendants United Van Lines, LLC and/or Hutchcraft Van Service, Inc. prior to the date of the incident described in plaintiffs' petition.

12. All written warnings issued to defendant Michael T. Watson regarding faulty equipment on the tractor trailer unit being operated by defendant Michael T. Watson at the time of the incident described in plaintiffs' petition.

13. Any and all notes, recordings photographs and information gathered by defendants' experts and relied on in their opinions.

14. Any and all documents, transcripts, photographs and information provided to defendants' named expert witnesses.

15. All repair records, repair estimates, work orders, invoices, and statements of any maintenance and/or service performed on the tractor trailer unit being operated by defendant Michael T. Watson at the time of the incident described in plaintiffs' petition for the period of time including sixty (60) days prior to the incident through sixty (60) days after the incident.

16. Any policy or procedure manual or driver's manual governing the operation of any vehicle by drivers for defendants.

17. Provide a copy of defendants' policy regarding logbook audits of its drivers' logbooks.
18. Provide a copy of defendants' policy regarding random drug and alcohol testing of its drivers.
19. Any accident reconstruction reports prepared concerning the incident described in plaintiffs' petition.
20. Any medical records and medical bills in your possession relating to treatment provided to plaintiff Tony Webster.
21. The driver qualification file of defendant Michael T. Watson.
22. The personnel file of defendant Michael T. Watson.
23. The driver's license record for defendant Michael T. Watson from 1991 to the present.
24. All medical records regarding treatment provided to defendant Michael T. Watson for injuries suffered in the incident described in plaintiffs' petition.
25. Copies of all policies that may provide insurance coverage to defendant Michael T. Watson and/or defendants United Van Lines, LLC or Hutchcraft Van Service, Inc. for the incident described in plaintiffs' petition.
26. All trip reports for defendant Michael T. Watson from June 16, 2001 to August 16, 2001.
27. All vehicle inspection reports for the tractor and the trailer operated by defendant Michael T. Watson at the time of the accident for the time period of sixty (60) days before August 16, 2001 to sixty (60) days after August 16, 2001.

28. All fuel receipts for fuel purchased by defendant Michael T. Watson for the time period of June 16, 2001 to August 16, 2001.

29. All scale tickets for vehicles operated by defendant Michael T. Watson during the time period of June 16, 2001 to August 16, 2001.

30. All reimbursement receipts or records turned in by defendant Michael T. Watson to defendants from the time period of June 16, 2001 to August 16, 2001.

31. Each and every bill of lading and loading tickets for each load delivered by defendant Michael T. Watson for the time period of June 16, 2001 to August 16, 2001.

32. All records of communication, including but not limited to, dispatching notes or records, for contact between defendant Michael T. Watson for the ten (10) days prior to August 16, 2001 up to and including all records of communication between defendant Michael T. Watson and defendants to the end of the day on August 16, 2001.

33. All records recording or noting the location of any vehicle operated by defendant Michael T. Watson from the time period of June 16, 2001 to August 16, 2001.

34. All payroll records and information for defendant Michael T. Watson as maintained by defendants.

35. All on-board recording device information, satellite data, computer data, or tracking device information for any vehicle operated by defendant Michael T. Watson during the time period of June 16, 2001 to August 16, 2001.

36. All results of a Qual-Comm communication device that was in the tractor-trailer unit involved in the incident that resulted in injury to Tony Webster.

37. All rapid deceleration reports for the time period from June 16, 2001 to August 16, 2001.

38. All documentation recording the results of any DOT required testing performed on defendant Michael T. Watson before and/or after the crash on August 16, 2002 that is described in plaintiffs' petition.

39. Provide copies of any random drug tests performed on defendant Michael T. Watson during his employment with defendant.

40. A copy of defendant Michael T. Watson's CDL license, front and back.

41. Balance sheets, profit/loss statements, income and expense statements, financial statements, income tax records and other documents of any kind or nature which show, record or picture the net worth of defendant for the current and previous five (5) years.

42. All answers to interrogatories or responses to request for production of documents with documents produced in any previous litigation brought against defendant within the past five (5) years.

43. All documents relating to any commercial vehicle accident, overturn, rollover, run-off-the road, or collision, occurring within the five years preceding August 16, 2001, involving any driver who was then driving for, or on behalf of, or under the motor carrier authority of defendant, which accidents were stated by such driver or by any investigating officer to be caused or contributed to be caused by the driver being tired, fatigued, sleepy, dozing, sleeping or caused or contributed to be caused by such driver's inattention.

44. All warnings or citations issued within the last year in regard to the tractor-trailer unit involved in the incident that resulted in injury to Tony Webster.

45. All motor vehicle warnings or citations issued within the last ten (10) years in regard to any vehicle driven by defendant Michael T. Watson, including commercial, recreational and personal vehicles.

HENNING & BOUGH, P.C.

By _____
R. Denise Henning, #43327
Stephen R. Bough, #46239
1044 Main, Suite 500
Kansas City, MO 64105
(816) 221-8442
(816) 221-8449 FAX
denisehenning@henningbough.com
stephenbough@henningbough.com

ATTORNEYS FOR PLAINTIFFS

Signature of this document certifies that a copy was served to the persons named below on the date and in the manner indicated:

Person Served	Party	Date	Method
Bob Horn Horn Aylward & Bandy, LLC 2600 Grand Blvd., Suite 500 Kansas City, MO 64108 (816) 421-0700 phone (816) 421-0899 fax	Defendants United & Hutchcraft	8/14/03	U.S. Mail