

INSTRUCTIONS TO CLIENTS

"YOUR CASE"

TALK TO NO ONE -- Do not talk to anyone about your accident except one of the lawyers or investigators in our office. You should always require identification so that you are sure who you are talking to. Do not talk to your own insurance company, railroad claim agent, company representative or any type of agent, attorney or investigator without first notifying our office so we can have these statements taken with one of our lawyers or investigators present.

YOUR DOCTOR -- You should return to each of your doctors as often as necessary and should always tell them about all your complaints. You should not minimize your ailments to your doctors. A doctor must know these things in order to properly treat you. If you plan to see any additional doctors, please advise us before you see them and tell us their names and addresses.

RECORDS -- Please keep accurate and detailed records of the following: (a) lost time and wages; (b) hospital, doctor, drug and other medical bills; (c) other losses directly resulting from your injury; (d) your complaints and progress as set out in your "My Day" instruction sheet. All your bills should be paid by check or you should obtain and keep receipts. The keeping of these records will be very helpful when, a year later, you will be asked by the defense to recall your pain, difficulties and your expenses.

REPAIRS -- Do not have your automobile, boat, airplane, farm implement, piece of machinery, household item or other object that was involved in your accident repaired until we have had time to examine it, have it photographed, have it examined by an expert or impounded as we feel is necessary in order to preserve the evidence as needed for your case. If your case involves a product or instrument not in your control, please try to see that it is not repaired or disposed of until we have photographed it and had it examined by an expert, if necessary.

OFFENSES, FINES OR DISCIPLINARY ACTION -- Do not appear or give statements before a traffic court, a coroner's inquest, a Federal Aviation Agency investigating board, a railroad investigating agency, a union investigating agency, a maritime investigating agency, or any other type of disciplinary board, panel or other proceedings without first notifying this office so that we might have one of the attorneys from this office be with you and represent you at such a hearing. The reason for this is to be sure that you do not prejudice yourself in the action in which we represent you.

WITNESSES -- Immediately furnish us with the correct names, addresses and telephone numbers of any and all witnesses you may learn of. This includes fellow workers and "My Day" witnesses. If someone will be leaving the area permanently, please call us so we can take their deposition if necessary.

EVIDENCE -- Give to your investigator the negatives and prints of any photographs pertaining to your case which you or any of your friends have taken. If you are required to be in the hospital and are receiving any type of treatment like traction or physical therapy, please notify our office so that we can have you photographed by our investigator or one of the members of your family. If your injury requires a cast, brace, traction or other appliance, save it for evidence in trial. You should notify us that you are keeping these items, and when the case is set for hearing you should bring these items with you. Please contact your own insurance carrier or company for a copy of all their photographs and investigation in your case. Please talk to us about any evidence that you have or know the whereabouts of that may help us to prove your injury case. Save any physical evidence and discuss it with your lawyer and investigator.

HOSPITAL AND DOCTOR BILLS -- Have your own insurance carrier pay as many hospital and doctor bills as possible. You should also have your hospitalization insurance, such as Blue Cross and Blue Shield, pay as much on your bills as possible. Doctors and hospitals are more cooperative when their bills are paid. You should not expect them to wait until your case is tried or settled to receive payment. You should, therefore, pay any balance as soon as possible.

BANKRUPTCY -- We need to know if you had filed for bankruptcy protection under any chapter *prior to the incident in question*, if that bankruptcy proceeding was still pending and had not yet been dismissed at the time of the incident that caused your personal injuries. Additionally, if you have filed or do in the future file for bankruptcy protection *after* the date of the incident, we need to know that, as well.

QUESTIONS -- We will probably not contact you until we have something definite to report. We will be contacting you for depositions, answers to interrogatories and when your case is ready for trial. If you have any specific questions in regard to these instructions or any other matters in regard to your case, please feel free to call or write us, or come in and review your file. Please be patient and remember that many things will be done on your file without your presence. For everyone's convenience, please do not come into the office expecting to see one of the attorneys without an appointment.

YOUR ADDRESS -- Be sure to keep us advised of any change in your address or telephone number.

