

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF CHEMUNG

Index No.: 2023-5539

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CAPREECE MOORE,

**COMBINED DEMANDS**

Plaintiff(s),

-against-

LESHA P. MASSOUP, DUKE HUR, J.B. HUNT  
TRANSPORT, INC. and COSTCO WHOLESALE  
CORPORATION,

Defendant(s).

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**PLEASE TAKE NOTICE**, that Plaintiff by his attorneys **THE PARIS LAW GROUP, P.C.**, hereby make(s) the following demands upon you:

1. Demand for the Names and Addresses of all Witnesses;
2. Demand for the Discovery and Inspection of any Statement of a party represented by the undersigned;
3. Demand for Insurance Coverage Information;
4. Demand for Photographs, Slides, Audio tapes, Video tapes and Motion pictures;
5. Demand for any Accident and/or Police Reports;
6. Demand for Expert Witness Information.

returnable at the office of the undersigned within twenty (20) days at **10:00 a.m.** as follows:

**DEMAND FOR THE NAMES AND ADDRESSES OF WITNESSES**

**PLEASE TAKE NOTICE**, that the undersigned hereby demands pursuant to CPLR §3101(a) and R.3120 (a) and the case of Zellman v. Metropolitan Transportation Authority, 40 A.D.2d 248, 339 N.Y.S.2d 255, that you set forth in writing and under oath the names and addresses of each person claimed by any party you represent to be a witness to any of the following:

- (a) The occurrence alleged in the complaint;

- (b) Any acts or conditions which have been alleged as causing the occurrence alleged in the complaint;
- (c) The names and addresses of any witnesses to the acts or conditions substantiating the alleged affirmative defenses plead in your answer; and
- (d) The names and addresses of any individuals who commenced legal action for injuries sustained as a result of the occurrence complained of in the instant action.

If no such witnesses are known to any party you represent, state in the sworn reply to this demand. The undersigned will object upon trial to the testimony of any witnesses not so identified.

**PLEASE TAKE FURTHER NOTICE**, that if any party you represent or its representatives, obtain names and addresses of persons who witnessed the occurrence alleged in the complaint or the acts, notice or conditions substantiating the alleged affirmative defenses or have first hand knowledge of such facts subsequent to the service of this notice, this information is to be furnished to the Plaintiff(s), whenever obtained. The Plaintiff(s) will object at the time of trial to the testimony of any persons not so identified.

DEMAND FOR DISCOVERY AND INSPECTION OF ANY STATEMENT  
OF A PARTY REPRESENTED BY THE UNDERSIGNED

**PLEASE TAKE FURTHER NOTICE**, that the undersigned demands upon behalf of the Plaintiff(s) in this action that pursuant to CPLR Article 31, you produce at the time and place above specified and permit the undersigned to discover, inspect and copy each and every statement made or taken by each party and his, her, or its agents, servants or employees now in your possession, custody or control or in the possession, custody or control of any party you represent in this action, if any such statement in any matter bears on the issues in this action. If no such statement(s) is(are) in the possession, custody or control of any parties you represent in this action, state in the sworn reply to this demand.

DEMAND FOR DISCOVERY AND INSPECTION  
OF INSURANCE COVERAGE

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the provisions of §3101 of the Civil Practice Law and Rules, any party you represent is required to serve upon the undersigned at the time and place specified above the declaration and coverage pages of any and all contracts of insurance and insurance policies, including the primary insurance policy of any party you represent, as well as reinsurance and/or excess liability, "umbrella," or "catastrophe" policies of any party you represent, the spouse of any party you represent or any relative residing with any party you represent, for liability on **11/12/2021** giving the name and addresses of each insurance carrier, the policy numbers thereof, the dates of coverage and/or policy periods, and the amounts of such and each policy coverage.

If, after investigation, no such reinsurance, excess liability, "umbrella," or "catastrophe" policies are found to exist, so state in a sworn reply to this demand.

DEMAND FOR PHOTOGRAPHS, AUDIO TAPES,  
SLIDES, VIDEO TAPES AND MOTION PICTURES

**PLEASE TAKE FURTHER NOTICE**, that undersigned demands on behalf of the Plaintiff(s) that pursuant to CPLR Article 31, you produce at the time and place above specified and permit the undersigned to discover, inspect, photograph and copy each and every photograph, audio tapes, slides, videotapes or motion pictures in defendant's custody, possession or control depicting the following:

- (a) The location where it is alleged that the occurrence complained of took place;
- (b) The condition complained of in the complaint;
- (c) Any vehicles involved in the occurrence depicting said vehicles after the occurrence;
- (d) The Plaintiff(s);
- (e) Any actions or activities of the Plaintiff(s);
- (f) The injuries sustained by the Plaintiff(s);

If no such photographs, slides, video or motion pictures are in the possession, custody or control of any parties you represent in this action, so state in the sworn reply to this demand.

DEMAND FOR ACCIDENT REPORT

**PLEASE TAKE FURTHER NOTICE**, that pursuant to CPLR §3101 and the case of Pataki v. Kiseda, 80 A.D.2d 100, 437 N.Y.S.2d 692 (2d Dept. 1981), that the undersigned demands upon behalf of the Plaintiff(s) in this action that you produce at the time and place above specified and permit the undersigned to discover, inspect and copy each and every written report of the occurrence which is the subject matter of this action, prepared in the regular course of business operations or practices of any party you represent, or persons or firms acting on behalf of any party you represent.

If no such report is in existence, so state in the sworn reply to this demand.

**REQUEST FOR DISCLOSURE OF EXPERT WITNESS  
INFORMATION PURSUANT TO CPLR §3101(d)**

**PLEASE TAKE NOTICE**, that pursuant to §3101(d) of the Civil Practice Law and Rules, the undersigned hereby requests that you produce, within twenty (20) days after service of this request, at **THE PARIS LAW GROUP, P.C.**, the following information:

- (a) Identify each person the party upon whom this request is served expects to call as an expert witness at the trial of this action.
- (b) The subject matter in reasonable detail upon which each expert named above is expected to testify at the trial of this action.
- (c) The substance of the facts and opinions upon which each expert named above is expected to testify at the trial of this action.
- (d) The complete qualifications of each expert named above.
- (e) A summary of the grounds for the opinion of each expert named above.

**PLEASE TAKE FURTHER NOTICE** that the foregoing are continuing demands and that if any of the above items are obtained after the date of this demand, they are to be furnished to the undersigned pursuant to these demands.

**PLEASE TAKE FURTHER NOTICE** that in the event of your failure to comply, a motion will be made for an Order to Strike your Answer, with costs.

Dated: New York, New York  
September 11, 2023

Yours, etc.

*Jason L. Paris*

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