

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF CHEMUNG

Index No.: 2023-5539

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CAPREECE MOORE,

Plaintiff(s),

**PLAINTIFF'S
POST DEPOSITION
DEMANDS**

-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 pursuant to Article 31 of the CPLR, the undersigned demands that Defendants produce with twenty (20) days at the office of the undersigned for the purpose of discovery, inspection, photocopying and photographing the following:

1. All photographs and videos taken by DUKE HUR, related to the subject accident and subject motor vehicle.
2. All photographs and videos taken by J. B. HUNT TRANSPORT, INC., related to the subject accident and subject motor vehicle.
3. All photographs and videos taken by COSTCO WHOLESALE CORPORATION, related to the subject accident and subject motor vehicle.

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.

Plaintiff will object at the time of trial of this action to the introduction of any photographs, videotapes, motion pictures and the like not so exchanged.

4. All accident/incident reports regarding the subject accident prepared by the defendant, DUKE HUR.

5. All accident/incident reports regarding the subject accident prepared by the defendant, J. B. HUNT TRANSPORT, INC.
6. All accident/incident reports regarding the subject accident prepared by the defendant, COSTCO WHOLESALE CORPORATION.
7. Any and all reports prepared in the ordinary course of business concerning the incident which is the subject of this lawsuit.
8. A copy of all appraisals, damage estimates and repair bills concerning damage to the defendants' vehicle arising out of this accident.
9. The MV-104 Motor Vehicle Department and/or accident report prepared by, or on behalf of the defendants with regard to the subject accident.

This demand explicitly requires a response from the Defendant(s) in person and under oath regarding the existence of such other coverage and responses such as "None Known" or "None to the Best of our Knowledge" from Defendant(s)' counsel will be deemed non-compliant.

Plaintiff will object at the time of trial of this action to the introduction of any documents/material that were not previously exchanged by the defendants.

Dated: New York, New York
December 6, 2023

Yours, etc.

Deborah Lara

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