

INSTRUCTIONS TO PERSONAL INJURY CLIENTS

9/19/03

1. **TALK TO NO ONE:** Do not talk to anyone about your case or the facts except your lawyer or his investigators. You should always require identification. Do not talk to your own insurance company or to any lawyers hired by your insurance company without notifying me so that I may be present. Give no statements and sign no papers. If you receive a form pertaining to this matter do not complete it but mail it to me right away. Do not discuss your case publicly with friends, co-workers or associates. Caution: Do not try to contact the defendant or any members of the defendant's family or any one connected to the defendant.
2. **YOUR DOCTOR:** You should return to each of your doctors as often as necessary and always tell them about all your symptoms. You should not minimize your ailments to your doctors as it is one of their best ways of knowing how to treat you. However, don't exaggerate either. If you begin treating with new doctors, be sure to give me their names and addresses.
3. **RECORD OF COMPLAINTS:** Please keep some record of your complaints and progress. This can be very helpful when, a year or so later, you are asked questions.
4. **LOST WAGES AND EARNINGS:** Please keep an accurate record of all days lost from work because of your injuries. One of the major things in your case may be the loss of income or potential income. I will need a copy of your union contract, if applicable, which shows wage rates. I will also need copies of your W-2 forms, and your income tax returns for at least the last five years. Please obtain from your employer the exact days you missed from work because of your injuries and the amount of money you would have made if you would have been working these days. If this injury prevented you from getting a raise or promotion or prevented you from obtaining employment, I will need the names, addresses and telephone numbers of witnesses who can prove this. I also want to know in detail what services you have been prevented from performing around the house, such as supervision of the children, housework, lawn work, etc.
5. **MEDICAL BILLS:** Obtain and keep duplicate copies of all medical, hospital and drug bills. Also keep records of any other expenses you may have in connection with your accident such as hiring extra help. All your bills should be paid by check or you should obtain and keep receipts. You should make and keep current an up-to-date list of all your bills and costs.
6. **CAR REPAIR:** If your case is one involving an automobile collision, do not have your automobile repaired or salvaged until I can take pictures of it. After pictures are taken by my office your collision insurance carrier may repair or salvage the car.
7. **TRAFFIC OFFENSES:** Never plead guilty to any traffic offenses. If you are arrested in connection with this collision, call me immediately and I will make sure you obtain legal counsel. In the event of any type of hearing be sure to notify my office so that I will be able to represent you in connection with this hearing.

8. **WITNESSES:** I will need the correct names and addresses and telephone numbers of any and all witnesses. Besides witnesses to the incident itself, I will want the names of friends, co-workers, etc., who can testify how this injury has affected your life. For example, your neighbor could tell about how you are not able to work as much around the house, or your friends could tell how you don't bowl anymore. It is all right if they are your friends or relatives, because they would be more likely to have observed you.

9. **SAVE ALL PHYSICAL EVIDENCE:** Keep everything pertaining to your incident such as the clothing you were wearing at the time, your eyeglasses, or the product that injured you. If your injury requires a cast, brace, traction or other appliance, save it for evidence and trial. You should notify me that you are keeping these things and when the case is set for hearing you should bring these items with you.

10. **PHOTOGRAPHS:** Send me the 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 my office so that I can decide whether or not to have photographs taken of your treatments.

11. **HOSPITAL AND DOCTOR BILLS:** Have your own auto insurance carrier and/or hospitalization insurance carrier pay as many hospital and doctor bills under the medical payment provisions of your policy 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.

12. **KEEP COPIES:** When you send me records, bills or other documents, keep a copy for your own records.

13. **QUESTIONS:** I will probably not contact you until I have something definite to report. I will be contacting you for depositions, answers to interrogatories, and when your case goes to trial, which may be in excess of two years from the time that suit is filed. If you have specific questions in regard to these instructions or any other matters regarding your case, please let me know. In general, it is easier and more efficient to respond to written letters and e-mails than phone calls, except in emergencies. I will then have a record of my communication with you.

14. **YOUR STATUS:** Be sure to keep me advised of any change in your address or telephone number. Write to me also if you return to work, if your marital status changes, or if you see a new doctor.

©Roxanne Barton Conlin
Griffin Building
319 7th Street, Suite 600
Des Moines, Iowa 50309