Zausmer, Kaufman, August & Caldwell, P.C. 31700 Middlebeit Road, Suite 150, Farmington Hills, MI 48334-2374 • 721 N. Capitol, Suite 2, Lansing, MI 48906-5163 2. Admit that Plaintiff is not currently under any doctor's disabilities related to this accident. If your answer is anything less than a complete admission, please provide any and all documentation in support of your answer.

RESPONSE:

 Admit that Plaintiff is currently working. If your answer is anything less than a complete admission, please provide and all documentation in support of your answer.

RESPONSE:

4. Admit that Plaintiff is able to work. If your answer is anything less than a complete admission, please provide any and all documentation in support of your answer.

RESPONSE:

Request for Production of Documents to Plaintiff

1. Copies of any and all medical records relating to injuries received as a result of the subject accident.

RESPONSE

2. Please produce copies of any and all photographs with regard to this accident.

RESPONSE

Defendants will pay reasonable photocopying costs for the documents produced.

Zausmer, Kaufman, August, & Caldwell, P.C.

JAMES C. WRIGHT (P67613)

Attorney for Defendant Efficient Design 31700 Middlebelt Road, Suite 150

Farmington Hills, MI 48334

(248) 851-4111

Dated: February 7, 2013

is receiving Medicare/Medicaid benefits. If so, please sign the enclosed authorization form, and submit with your Answers to these Interrogatories pursuant to MCR 2.310.

ANSWER:

5. Will you agree to supplement these answers throughout the course of discovery if any answer becomes incorrect?

ANSWER:

Zausmer, Kaufman, August & Caldwell, P.C.

JAMES CLWRIGHT (P67613)

Attorneys for Defendant Efficient Design 31700 Middlebelt Road, Suite 150 Farmington Hills, MI 48334 (248) 851-4111

Dated: February 7, 2013