

[attorney name redacted], Esq. (CSBN ///////////////#)
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Attorneys for Defendants the DIXON FURNITURE, INC,
NANCY DIXON, and MATT DIXON
Note: all names have been changed.

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES**

TOM BROWN,

 Plaintiff,

 vs.

DIXON FURNITURE, INC.;
NANCY DIXON;
ROLF DIXON; and
DOES 1 through 100, Inclusive

 Defendants

Case Number: [redacted]

DEMAND FOR PHYSICAL EXAMINATION

Complaint filed: [redacted]
Assigned to: [redacted]
Dept: [redacted]

Discovery cut-off: none set
Trial date: none set

**TO PLAINTIFF TOM BROWN AND HIS ATTORNEY OF RECORD IN THE
ABOVE-CAPTIONED MATTER:**

Defendant DIXON FURNITURE, INC. (hereinafter “**PROPOUNDING PARTY**”)
hereby demands, pursuant to Code of Civil Procedure § 2032.220, that Plaintiff TOM
BROWN submit to a physical examination by Dr. _____ (hereinafter
“**DOCTOR**”), whose specialty is _____, at the following date, time
and place:

Date: _____

1
2 Time: _____

3 Place: _____

4 and continuing so long as reasonably required. The DOCTOR'S examination of Plaintiff will
5 consist of a general physical examination, including Plaintiff completing a medical
6 questionnaire and submitting to an interview, blood samples for laboratory analysis, and
7 _____ . The scope of the examination will be (a) to ascertain whether
8 Plaintiff has been "rendered sick, sore, lame, disabled and disordered, both internally and
9 externally, and suffered, among other things, numerous internal injuries, severe fright, shock,
10 pain discomfort and anxiety," as alleged in Plaintiff's Complaint ¶¶ 23, 37, 52, 66 and 80, (b)
11 to ascertain whether Plaintiff suffers from any asthma-related condition, such as "pre-
12 asthma," and (c) to ascertain the severity any such condition, including whether any such
13 condition is permanent or incurable.
14

15 PROPOUNDING PARTY is entitled to obtain the physical examination without
16 leave of the court because Plaintiff has alleged physical injuries, as quoted above, and also
17 because Plaintiff has prayed "For medical expenses and related items of expense, according
18 to proof," as alleged in Plaintiff's Complaint at page 19, line 8.

19 Pursuant to Code of Civil Procedure § 2032.230(b), Plaintiff is required to serve a
20 response on PROPOUNDING PARTY within 20 days of the service hereof.
21

22 Dated: _____

[redacted]

23
24
25 _____
[redacted], Attorneys for Defendants DIXON
26 FURNITURE, INC., NANCY DIXON, and
ROLF DIXON.