

ATTORNEY'S CASE EVALUATION QUESTIONNAIRE

Please, print, fill out, and FAX this to David L. Berger at (702) 792-0103.

INSTRUCTIONS: Fill out this form as completely as possible. If you represent the plaintiff and your case has not been filed, please indicate as such. Please also indicate any existing evidence supporting your client's position and your contemplated "theory" of the litigation. If no "theory" has yet been established, indicate that also.

Defense council considering a Motion for "Summary Judgment"; please also indicate whether your jurisdiction requires a written report of the expert and what time constraints exist.

Many attorneys, both plaintiff and defense, in an effort to save cost expenditures, wait until the "last minute" prior to retaining an expert, thus it is imperative for us to know your date for designation of experts along with the discovery cutoff date. A responsible expert will not accept a case if either of those dates are "imminent"; the concern being that the expert's review of the discovery material may not be accomplished prior to those dates and a negative report following "designation" may severely affect the attorney's case at a point where he/she does not have the time to salvage their position. Also, should the expert be subpoenaed for a deposition by the opposition, the attorneys position could be severely impaired.

ATTORNEY AT LAW

NOTE: IF ABOVE PROFESSIONAL STANDING HAS BEEN MISREPRESENTED, SERVICE WILL NOT BE RENDERED.

REPRESENTING: Plaintiff Defense

TRIAL COURT AND CASE #:

CASE CAPTION:

(Primary litigants only)

DATE, DAY & TIME OF INCIDENT:

DATES: Discovery cut off

Designation of expert

Trial

DETAILS OF INCIDENT:

INDICATE ALL LOCATIONS INVOLVED:

- Hotel Motel Casino House Condo Apartment
Business Retail Commercial Industrial Manufacturing
Restaurant Bar Theatre Sporting event Auditorium
School Elementary Middle High School University
Pvt. vehicle Bus Train Airplane Ship Pedestrian
Open parking lot Subterranean parking Parking structure
Hallway Pedestrian sidewalk Vehicle street Dirt path

Other location not listed above:

INDICATE ANY CRIMES INVOLVED:

- Homicide Robbery Burglary Assault Battery Rape

Other crime not listed:

**FALSE ARREST OR DETENTION AND / OR UNLAWFUL USE OF FORCE ISSUES
BY SECURITY PERSONNEL OR OTHER PRIVATE PERSONS**

- Shoplifting arrest Arrest in hotel Arrest in restaurant or bar

Other location of arrest or detention

SECURITY PERSONNEL ISSUES

Guard hiring practices Training Inadequate supervision

Arrest procedures Patrolling procedures Alarm response

Use of force Handcuffing Interrogation

ISSUES RELATING TO SECURITY EQUIPMENT:

Locks or locking hardware Closed circuit television surveillance

Alarms Audio recordings (edited or altered) Communications

REPORTS AVAILABLE (relating to the case at issue):

Police Security Insurance Photos Diagrams

Local law enforcement crime statistics: Area Calls for Service

RECOMMENDATIONS OF DISCOVERY MATERIAL SUGGESTED TO BE OBTAINED WILL BE INDICATED, BASED ON THE SUBSCRIBER'S DATA, AS PRESENTED IN THE "CASE INFORMATION QUESTIONNAIRE". IT WILL BE PREPARED ON AN INDIVIDUAL BASIS BY DAVID L. BERGER, OR ONE OF THE STAFF EXPERTS, ON THE SECURITY CHECKLIST FORM.