

Client: \_\_\_\_\_

Date: \_\_\_\_\_

Discovery Deadline: \_\_\_\_\_

Trial: \_\_\_\_\_

# Auto Fraud Car Case

## Discovery Essentials

### **From Dealer**

- Complete Sales File
- Complete Repair File
- Acquisition Documents
- PSI Checklist
- Buyers Guide
- Trade In File
- Dealer License
- Salesperson Licenses
- Documents from Prior Owner
- Warranty or Service Contract
- CarFax Contract
- AutoCheck Contract
- Last 5 Years Lawsuits
- Your Ebay ID
- Tax Returns

### **From BMV**

- Full Title History
- Sales History
- Dealer License

### **From Repairing Dealers**

- Repair Orders
- Any documents related to vehicle

**From Police**

Accident Report

**From Insurance Company**

Repair Estimates  
Entire Insurance File

**From AutoCheck/CarFax**

Vehicle History Report  
Usage by VIN Report  
Contract with Dealer

**From Auto Auction**

All documents related to the sale of the subject vehicle  
All documents related to any “arbitration” of the sale of the subject vehicle  
All photographs taken of the subject vehicle  
Auction Slip

**From Manufacturer**

Warranty Records

**Prior Owners**

All documents related to purchase of the vehicle  
All documents related to sale of the vehicle  
All documents related to repair of the vehicle

**From Auto Trader/eBay**

All adds placed by dealer for vehicle

**From Service Contract Holder**

Warranty Contract  
Warranty Claims History  
Telephone Log

**From NHTSA**

Relevant Consumer Complaints  
Relevant TSBs  
Relevant Recalls  
Relevant Defect Investigation Documents

**From FIN**

Payments made  
Balance on Loan

**From Defense Expert**

Report  
Resume  
Hand Written Notes  
Photographs/Videos  
Anything else they relied on in forming their opinion

**From Plaintiff Expert**

Report  
Resume  
Hand Written Notes  
Photographs/Videos  
Anything else they relied on in forming their opinion

**From Client**

Memorandum of Title  
Vehicle Registration  
Warranty booklet  
Owner's manual  
Originals of all repair paperwork  
Originals of all sales paperwork  
Originals of all receipts for any out of pocket expenses  
Any photographs of the vehicle  
Anything else that you think relates to your case