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Motion to Disallow Medical Narrative Report

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IN THE STATE OF _____ COUNTY

STATE OF GEORGIA

John Doe,)	
)	
Plaintiff,)	
)	
vs.)	CIVIL ACTION
)	
Richard Roe,)	
)	
Defendant.)	

OBJECTION OF _____

TO MEDICAL NARRATIVE LETTER

COMES NOW _____, Defendant in the above-styled action, and files this its objection to the Plaintiff's purported use of a letter dated September 11, 1997, from _____, M.D., to _____, the attorney for the Plaintiff, and shows the following:

This Defendant objects to the procedure set forth in O.C.G.A. §24-3-18 on the basis that the procedure set forth therein violates the 5th and 14th Amendments of the Constitution of the United States, by depriving the Defendant of its property without due process of law, and by depriving the Defendant of equal protection of the law. This Defendant further objects to the procedure on the basis that it violates the equal protection and due process clauses of the Constitution of the State of Georgia. Specifically, the procedure deprives the Defendant of its right of cross examination of the Plaintiff's witnesses without having to hire the Plaintiff's own witness for the cross examination procedure. Defendant further objects to said procedure for all the reasons set forth in the brief in support of said motion filed contemporaneously herewith.

This ____ day of _____, 1997.

LAW FIRM, L.L.P.

By: _____

Ga. Bar No. _____

Attorney for _____

P.O. Box _____

_____, Georgia 00000

(706) ____ - _____

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