

MEMO

To: Beaugard Bamborough  
From: Paralegal Jack Graue  
Re: Defense Medical Evaluation in Pending Personal Injury Matter  
Date: [Insert Date]

You have asked me to explain the purpose of the Defense Medical Evaluation (“DME”), what you should expect during the examination, and what my role will be while accompanying you to this appointment.

The purpose of the DME is to allow the opposing party in your personal injury case to have you examined by a physician of their choosing. The defense uses this examination to evaluate your alleged injuries, assess their severity, and form opinions regarding causation, treatment, and any claimed limitations. Although the examination is often referred to as “independent,” the physician is retained by the defense and is not providing treatment or medical advice.

As for what you can expect at the DME, the physician will likely ask questions regarding your medical history, the accident at issue, your current symptoms, and any treatment you have received. You may be asked to perform basic physical movements so the physician can evaluate your range of motion or functional ability. The examination is typically brief and limited to the injuries you are claiming in this case. You should answer all questions truthfully and directly, but you should not volunteer additional information beyond what is asked.

My role at the DME will be to accompany you as a representative of our office and observe the examination. I will not interfere with the physician’s evaluation, but I will take notes regarding the duration of the exam, the questions asked, and any tests performed. My presence is intended to ensure that the examination is conducted appropriately and remains within proper boundaries.

Please let me know if this explanation addresses your concerns or if you would like further clarification prior to the examination.

Respectfully submitted,

Jack Graue