



**INSURER'S**  
**HEARING MEMORANDUM**

TO BE COMPLETED BY COUNSEL FOR THE INSURER PRIOR TO HEARING

DATE: \_\_\_\_\_ BOARD #: \_\_\_\_\_

EMPLOYEE: \_\_\_\_\_

EMPLOYER: \_\_\_\_\_

INSURER: \_\_\_\_\_

COUNSEL FOR INSURER: \_\_\_\_\_

ADDRESS: \_\_\_\_\_  
\_\_\_\_\_

COUNSEL FOR EMPLOYEE: \_\_\_\_\_

ADDRESS: \_\_\_\_\_  
\_\_\_\_\_

ISSUES TO BE ADDRESSED AT HEARING (*PLEASE CHECK ALL THAT APPLY*):

- Liability, i.e., deny industrial injury
- Disability and extent thereof
- Causal relationship
- Deny entitlement to §36 benefits
- Deny entitlement to §13 & §30 benefits
- Proper notice
- Proper claim
- Deny serious & willful misconduct
- Other \_\_\_\_\_

Request Permission to Depose:

Dr. \_\_\_\_\_  
\_\_\_\_\_

**ISSUES TO BE ADDRESSED AT HEARING:**

a. Stipulations of Fact: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

b. Witnesses at Hearing:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

c. Exhibits to be Marked at Hearing:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

d. Medical Reports [Under 452 CMR 1.11 (6)]:

1. \_\_\_\_\_
2. \_\_\_\_\_
3. \_\_\_\_\_
4. \_\_\_\_\_
5. \_\_\_\_\_

*Medical Reports must be accompanied by the physician's curriculum vitae or stipulation of qualifications.*

Will an Interpreter be Needed?:  
YES  NO

Language to be Interpreted (if applicable):

***NOTE: The party offering testimony by a witness who requires an interpreter must provide a certified interpreter at the time of hearing.***