

# Ontario PI Prompt Playbook

Ontario Trial Lawyers Association (OTLA) – Webinar Follow-Up

*Practical prompting for Ontario personal injury files*

In collaboration with

## How to Use This (30 seconds)

This is a **3-page practical prompt handout**, organised to mirror how Ontario PI lawyers actually work a file:

**Pages 1-2** – Get control of the file + Examination for Discovery

**Pages 2-3** – Mediation, damages, and settlement strategy

These prompts are **thinking tools**, not drafting shortcuts. They are designed to surface evidence, reduce risk, and sharpen judgment.

## Prompting Rules (Read First)

- Always set role: *Ontario personal injury lawyer acting for the plaintiff*
- Anchor outputs to **records, dates, authors, and quotes**
- Ask for **chronology before conclusions**
- Separate **fact extraction** from **strategy**
- Where possible **isolate documents** you want to focus on, e.g. discovery transcripts

## Getting the File & Discovery

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### 1. One-Page Case Summary (Internal Anchor)

I am an Ontario personal injury lawyer acting for the plaintiff. Provide a **one-page, neutral summary** of this motor vehicle accident case based strictly on the records.

Include:

- Accident overview and parties
- Procedural posture (as reflected in the records)
- Injuries and medical course
- Key treatment milestones
- Pre-existing conditions noted
- Consistencies, inconsistencies, and gaps
- Key strengths and risk areas (plaintiff-side)

Do not advocate. Flag missing information.

## 2. Accident Benefits – Letter to Adjuster

Based strictly on the records, identify:

- impairments and functional limitations,
- treatment recommendations,
- and documented need for accident benefits.

Provide **direct quotes with dates and authors** supporting entitlement.

## 3. Examination for Discovery – Preparation

### Discovery Overview

Summarise the plaintiff's pre-accident work, education, and health history. Identify defence risks or vulnerabilities in these areas.

### Under-Reporting Risk

List all documented ongoing physical, cognitive, or emotional impairments so they can be reviewed before discovery.

### Anticipating Undertakings

Identify likely discovery undertakings, missing documents, and areas where follow-up production is expected.

## 4. Examination for Discovery – Live Use

### Strengths & Weaknesses (Quick Reference)

Summarise the strongest plaintiff points and the most vulnerable areas likely to be attacked by the defence.

### Re-Examination of the Plaintiff

Identify documented examples of reliance on medical, family (cueing / prompting), or educational supports.

Prepare **open-ended re-examination questions** that clarify prior answers without introducing new evidence.

## Mediation & Settlement Strategy

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## 5. Evidence Extraction (High-Impact)

### Direct Quotes (Mediator-Ready)

Extract the most important direct quotes supporting injury severity, functional impairment, causation, and future care. Organise chronologically and cite sources.

## 6. Timeline & Medical Chronology

### Immediate Aftermath Timeline

Create a chronological timeline from the collision through the immediate aftermath, including

emergency response and early symptom reporting.

### Medical Chronology

Using the medical chronology, identify:

- symptom progression,
- treatment escalation or gaps,
- consistency across providers,
- and contradictions.

### Table of Prescriptions

**Create a table of all medications used in this case, split into: pre-accident, post-accident, and current.**

Columns: Medication, Indication, Prescriber, Dose/Frequency (if available), Start Date, End Date, Notes. Highlight (1) pain meds, (2) psych meds, (3) opioids, (4) meds implying pre-existing conditions. If dosage isn't available, state "not specified." Cite the supporting source for each row.

## 7. Late Defence Mediation Memorandum

The defence has delivered a mediation memorandum late. Summarise defence positions and identify:

- unsupported factual assertions,
- medical opinions conflicting with treating providers,
- and understated defence risk.

## 8. Pre- vs Post-Accident Medication Analysis

Create a table comparing **pre- and post-accident medications**, including:

- medication name,
- purpose,
- prescribing provider,
- dosage and frequency,
- date first prescribed.

Identify new medications, dosage increases, and escalation. Then provide a **plain-language glossary** explaining what each medication is typically prescribed for.

## Final Note

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These prompts help Ontario PI lawyers:

- see the full record,
- reduce credibility risk,
- and negotiate from evidence, not instinct.

**AI doesn't replace judgment — it removes blind spots.**

