I. Collateral Source

A. Can plaintiff submit to a jury the total amount of his/her medical expenses, even if a portion of the expenses were reimbursed or paid for by his/her insurance carrier?

Yes, but the "total amount" of medical expenses is limited to the amount actually incurred, paid or still owing for medical care, not the amount billed. Howell v. Hamilton Meats & Provisions, 52 Cal.4th 541, 555; 129 Cal.Rptr.3d. 325, 332-333; 257 P.3d 1130, 1137-1138 (Cal. 2011).

B. Is the fact that all or a portion of the plaintiff’s medical expenses were reimbursed or paid for by his/her insurance carrier admissible at trial or does the judge reduce the verdict in a post trial hearing?

No. Evidence that payments for medical care were made in whole or in part by an insurer is inadmissible at the time of trial under the collateral source rule. Howell, 52 Cal.4th at 567; 129 Cal.Rptr.3d. at 344; 257 P.3d 1130 at 1145.

C. Can defendants reduce the amount plaintiff claims as medical expenses by the amount that was actually paid by an insurer? (i.e. where plaintiff’s medical expenses were $50,000 but the insurer only paid $25,000 and the medical provider accepted the reduced payment as payment in full).

Yes. A plaintiff many not recover more then his/her medical providers accepted in full payment for their services. The amount paid may be admitted into evidence without evidence of the payment's source. Where a plaintiff's health care providers have accepted a reduced, or negotiated, rate for services, evidence of the full amount billed for a plaintiff's medical care is not admissible to determine past medical expenses. Howell, 52 Cal.4th at 563; 129 Cal.Rptr.3d. at 340; 257 P.3d at 1142-1143.

Evidence of the full amounts billed for a plaintiff's medical past expenses are also not admissible to determine future medical expenses and noneconomic damages. Corenbaum v. Lampkin 215 Cal.App.4th 1308, 1330-1333; 156 Cal.Rptr.3d 347, 362-365 (Cal. 2nd Dist. 2013).
II. Accident and Incident Reports

Can accident/incident reports be protected as privileged attorney work product prepared in anticipation of litigation or are they deemed to be business records prepared in the ordinary course of business and discoverable?

Yes. "Where an employee's connection with a matter grows out of [his/her] employment to the extent that his report or statement is required in the ordinary course of the corporation's business...[the] statement or report is that of the employer" and is protected by the attorney-client privilege in anticipation of litigation. D.I. Chadbourne, Inc. v. Superior Court (San Francisco) 60 Cal.2d 723, 736-739; 36 Cal.Rptr. 468, 477-479; 388 P.2d 700, 709-711 (Cal. 1964).