SUPREME COURT OF THE STATE OF NEW YORK COUNTY OF NEW YORK

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CLYDE WILSON, ) Index No. \_\_\_\_\_\_\_\_

Plaintiff, )

-against- ) **REQUEST FOR**

CHARLES JACOBS, ) **PRODUCTION OF**

Defendant. ) **DOCUMENTS**

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TO: CHARLES JACOBS AND HIS ATTORNEY: YOU ARE HEREBY requested to identify each and every document in your possession, custody or control which is included in each of the following categories. YOU are further requested to produce each of the documents identified at the place herein specified and to permit the inspection and copying thereof by defendant.

**REQUEST TO PRODUCE:**

1. In the abstract, any and all documents relating to the professional duties of a generic file clerk as explicitly defined and professionally delimited by the laws which YOUR firm, Dice & Jacobs Law, are required to comply with.
2. In the particular, any and all documents relating to the professional duties of a generic file clerk as explicitly defined and professionally delimited by the firm, of which YOU are partner, Dice & Jacobs Law.
3. The professional review documentation of the plaintiff, Clyde Wilson, who worked as a file clerk at YOUR firm for exactly twenty years.
4. The discharge documentation of Clyde Wilson as presented to the Human Resources department at YOUR firm to have been placed into Clyde Wilson’s professional file.
5. The abstract of the wage scale utilized by YOUR firm. The particular document elucidating the mechanism of wage scale of file clerks at YOUR firm. This includes yearly salary, health care benefits (medical & dental), retirement accounts, and all other such sundries which are necessarily influenced by one’s seniority at YOUR firm.
6. All documentation from the Human Resources Department at YOUR firm which, in addition to detailing the specific labor rights each employee is entitled to under federal law and state law also stipulate YOUR firm’s discretionarily-set policies augmenting the former. Compile this documentation in a separate memorandum.

The inspection and copying will take place at the law offices of John Disraeli, Esq., and shall be accomplished by the delivery of the requested documents and the immediate return of the documents to the person who delivered them; provided, however, that above-described procedure will not be required if, before the date and time set for the production, specifically, June 29th, 2019, copies of the requested documents are delivered, personally or by mail, with the response to this notice required by COURT RULE 34, to the offices of John Disraeli, Esq.

Full compliance with this request will require production of actual photographs or negatives. Xerox copies of any requested photograph will not be deemed compliance with this request.

Please note that you are required by COURT RULE 34, to file and serve a written response to this request for identification and production within 30 days.

DATED this 30th day of May, 2019.

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Eric Komar, Paralegal to the Attorney for the Plaintiff John Disraeli, Esq.,  
  
 CERTIFICATE OF MAILING

I hereby certify that on this 30th day of May, 2019, I placed a true and correct copy of the foregoing REQUEST FOR PRODUCTION OF DOCUMENTS in the United States Mail, postage prepaid, addressed to counsel on the attached service list:

650 West 47th Street  
New York, NY 10036  
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