COMMONWEALTH OF MASSACHUSETTS

<county>, ss. SUPERIOR COURT

DOCKET NO. <docket>

<plaintiff>, )

Plaintiff, )

)

VS. )

)

<defendant>. )

Defendant. )

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ )

**DEFENDANT, <defendant>’S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS FOR THE PLAINTIFF, <plaintiff>**

The Defendant, <defendant>, pursuant to Rule 34 of the Massachusetts Rules of Civil Procedure, requests that the plaintiff, <plaintiff>, produce and permit the defendant to inspect, copy and photograph all non-privileged documents and things in the plaintiff’s possession, custody or control, which embody, refer to or relate to the following subjects.

**DEFINITIONS**

For purposes of these Requests the uniform definitions set forth in Superior Court Standing Order 1-09 shall apply, and in addition, the following definitions shall apply, unless otherwise specified:

1. “You”, “your”, and “Plaintiff” shall refer to the named plaintiff, Georgette Diaz individually.
2. “Defendant” will refer to the named Defendant, <defendant>, their agents, servants, employees, and trustees.

**REQUESTS**

REQUEST NO. 1

REQUEST NO. 2

REQUEST NO. 3

REQUEST NO. 4

REQUEST NO. 5

REQUEST NO. 6

REQUEST NO. 7

REQUEST NO. 8

REQUEST NO. 9

REQUEST NO. 10

REQUEST NO. 11

REQUEST NO. 12

REQUEST NO. 13

REQUEST NO. 14

REQUEST NO. 15

REQUEST NO. 16

REQUEST NO. 17

REQUEST NO. 18

REQUEST NO. 19

REQUEST NO. 20

REQUEST NO. 21

REQUEST NO. 22

Respectfully submitted,

The Defendant,

<defendant>,

By its attorney,

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John Smith, BBO #000000

Suffolk University Law School

120 Tremont Street, 6th Floor

Boston, Massachusetts 02108

(123) 456-7890

[jsmith@email.com](mailto:dcolarusso@suffolk.edu)

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