**TENANT’S DISCOVERY REQUESTS**

**COMMONWEALTH OF MASSACHUSETTS TRIAL COURT**

|  |  |
| --- | --- |
| {{ trial\_court.address.county }}, ss | {{ trial\_court }}  Docket number: |
| {{ users }}  {{ users.as\_noun("Tenant") }} / {{ users.as\_noun("Plaintiff") }} | TENANT’S REQUEST FOR DISCOVERY (INTERROGATORIES AND REQUESTS FOR DOCUMENTS) |
| **vs.**  {{ other\_parties }}  {{ other\_parties.as\_noun("Landlord") }} / {{ other\_parties.as\_noun("Defendant") }} |  |

**Notice to Landlord**

1. Interrogatories: You are required by law to answer the interrogatories (questions) below truthfully and fully, under the pains and penalties of perjury, no later than forty-five (45) days from receipt. Before each of your answers, you must include the question you are answering (re-state the interrogatory to which you are responding). Include not just the information that is known to you but also information available to you from to those who work with or for you (by asking them what information they have) to answer the question completely.
2. Document Requests: You are required by law to make a written response to each of the requests for documents no later than thirty (30) days from receipt (or within 45 days from service upon you of the summons and complaint). You must provide any and all requested documents in your possession in addition to documents your agents or employees may have (in other words, all documents “in your custody or control.”

Documents provided with your responses should be organized and labeled to correspond to the categories in the request (or produced as they are kept in the regular course of business.) See Rule 45 of the Mass. Rule of Civil Procedure.

1. Your written, sworn Interrogatory responses and written responses to the Document Requests, together with the documents provided, should be mailed or delivered to the Tenant’s apartment (or to the Tenant’s attorney if they have one). It is helpful both to email your interrogatory and document request responses **and** mail/deliver them to the Tenant (or the Tenant’s attorney) to make sure they are received.
2. You are also required to supplement or amend your responses to this Discovery if after you have responded you learn:
   1. the identity of other persons with information about the questions asked (including expert witnesses you intend to have testify at trial); or
   2. that any of the information you gave in the responses was incorrect when made or is no longer correct.

Definitions

1. The terms “you,” “defendant,” and “Landlord” include the defendant(s) named above and any and all other persons or entities with any ownership in the premises, as well as defendant’s agents, employees, relatives, attorneys, and anyone acting on their behalf.
2. The term “apartment” refers to the house or unit that the tenant occupies, including the exterior and common areas. If the tenant has occupied more than one apartment under an arrangement with the defendant, this covers any and all apartments occupied by the tenant.
3. The term “Tenant” includes the plaintiff(s) named above and their agents, household member(s), attorney(s), and anyone else acting on the tenant’s behalf.
4. The term “building” refers to the building, common areas, grounds, and any other apartments at the address where the tenant’s apartment is located.
5. The term “document” includes: writings, videotapes, electronic mail, or other documents electronically stored or sent, drawings, photographs, digital images, recordings, contracts, agreements, correspondence, memoranda, reports, notes, requests, bills, orders, notices, , complaints, answers and other court pleadings, , checks, diary entries, and other writings and recordings of any kind. A draft or non-identical copy is a separate document within the meaning of this term.
6. The term “concerning” means referring to, relating to, supporting, describing, reflecting, constituting, or in any other way referencing.
7. Unless otherwise specified, the applicable time period for these requests is the period of the Tenant’s occupancy of the apartment(s), plus one month before such occupancy and one month afterward if the Tenant has vacated.

INTERROGATORIES (Questions)

{%p if interrogatories.any\_in\_category("Tenancy") %}

Tenancy

{%p endif %}

1. {%p if interrogatories[“respondent\_info”] %}
2. What is the name, address, email, telephone number, occupation, and relationship to the Tenant’s apartment of the person answering these questions?
3. {%p endif %}
4. {%p if interrogatories[“apartment\_ownership\_details”] %}
5. What is the name and address of each owner of the apartment, and the date they bought the building?
6. {%p endif %}
7. {%p if interrogatories[“tenancy\_terms\_description”] %}
8. Please describe all the terms of the tenancy, including, but not limited to:
   1. The original rent;
   2. The day of each month on which rent is due;
   3. Whether the rental agreement was oral or in writing, and the time period of such an agreement;
   4. The responsibility of each of the parties for payment of water, heat, hot water, electricity, cooking fuel for the apartment, and for any common area utilities and whether these responsibilities are in writing;
   5. Any additional terms of the original tenancy; and
   6. Any changes in the terms of the tenancy (including, but not limited to, changes in rent, changes to the responsibility for paying for utilities, or changes to the area being rented), including the date(s) of all such changes, whether the changed terms were in writing, and what the changed terms were.
9. {%p endif %}
10. {%p if interrogatories[“management\_information”] %}
11. Please describe in full and complete detail the management of the apartment and/or building during the tenancy, including but not limited to the name and address of the management company or individual(s) responsible, a description of each such person’s duties, for how long they managed the building, and their job training, experience, and qualifications, and how and when the Tenant was notified of whom to contact for issues related to the tenancy (including when and where at the building such information was visibly posted).
12. {%p endif %}
13. {%p if interrogatories[“record\_keeping\_systems”] %}
14. Please describe in detail any record-keeping system used by the Landlord for the tenancy, including but not limited to documenting or recording requests for repairs, work orders, problems or the like.
15. {%p endif %}

{%p if interrogatories.any\_in\_category("Tenant’s Claims") %}

Tenant’s Claims

{%p endif %}

1. {%p if interrogatories[“persons\_with\_knowledge”] %}
2. For each person with knowledge of the facts alleged in the Tenant’s complaint or the Landlord’s answer or counterclaims, please state:
   1. The person’s name, current (or last known) address, email, and telephone number;
   2. The person’s relationship with the Landlord (employee, contractor, relative, etc.);
   3. The factual information known to such person; and
   4. The expert training and qualifications of such person, if any.
3. {%p endif %}
4. {%p if interrogatories[“trial\_witnesses”] %}
5. For each person you intend to call as a witness at trial, please state:
   1. The person’s name, current (or last known) address, and current (or last known) email, and telephone number;
   2. A description of their anticipated testimony; and
   3. The expert training and qualifications of such person, if any.
6. {%p endif %}

{%p if interrogatories.any\_in\_category("Subsidized Housing") %}

Public and Subsidized Housing/Rental Assistance

{%p endif %}

1. {%p if interrogatories[“subsidized\_housing\_facts”] %}
2. If the Tenant receives a subsidy or lives in a subsidized unit, please describe all facts related to such subsidy including but not limited to:
   1. The name of the subsidy program and housing authority (or the administering agency);
   2. The full contract rent under the subsidy program;
   3. The tenant’s portion of the rent, and any changes thereto;
3. {%p endif %}
4. {%p if interrogatories[“subsidy\_communications”] %}
5. Please describe in full detail any verbal communications or written notice(s) between the Landlord and the housing authority or agency administering any subsidy involved in the tenancy, including but not limited to for each such communication:
   1. The factual substance/reason and date of each communication;
   2. The persons involved in the communication;
   3. Whether the communication was verbal or in writing;
   4. A description of any repairs or the like needing to be made, together with any deadlines set forth in the communication (for example, a time given to make a repair or provide a requested document);
   5. Any action taken by the Landlord in response to each communication received; and
   6. The applicable date(s) and reason(s) for any stoppage(s) and re-start(s) of subsidy payment to the Landlord by a housing authority or other agency administering a voucher for the tenancy.
6. {%p endif %}
7. {%p if interrogatories[“rental\_assistance\_communications”] %}
8. Please describe in full and complete detail your communications with any representative of an agency related to the Tenant’s application for RAFT, HomeBase, or other rental assistance (note: “complete detail” should include, for each communication, the date and substance of each conversation/communication and persons involved, specifying for each whether it was verbal or in writing).
9. {%p endif %}
10. {%p if interrogatories[“rental\_assistance\_refusal”] %}
11. If you have refused to accept rental assistance from RAFT or any other rental assistance/subsidy program (or intend to refuse such assistance if offered or approved), please describe in full and complete detail the reasons for such refusal.
12. {%p endif %}

{%p if interrogatories.any\_in\_category("Problems with the Apartment/Building") %}

Problems with the Apartment/Building

{%p endif %}

1. {%p if interrogatories[“maintenance\_and\_repairs”] %}
2. Please describe in full and complete detail the maintenance of the apartment and/or building during the tenancy, including but not limited to the identity (by name, address and telephone number) of each responsible person or company, a description of each such person’s duties, the time period of maintaining the apartment or building, and their job training, experience, and qualifications, and how and when the Tenant was notified of whom to contact for repair needs.
3. {%p endif %}
4. {%p if interrogatories[“repair\_issue\_details”] %}
5. Please describe in full and complete detail how you came to know of each and every need for repair or other problem in the Tenant’s apartment or common areas of the building, or both, within the most recent 6 years of the tenancy. (This includes both alleged and confirmed problems, including, but not limited to, **each of the problems described in the Tenant’s Complaint**.) For each such problem or condition, please state:
   1. The nature of the problem;
   2. The date you first became aware of such problem;
   3. How you first became aware of such problem—that is, who, if anyone, informed you and how (verbally or in writing); and
   4. What steps, if any, you took in response to being notified of such problem, including whether your investigation confirmed that there was a need for repair.
6. {%p endif %}
7. {%p if interrogatories[“inspections\_details”] %}
8. Please describe in detail any inspections of the apartment or building conducted by the Board of Health, Inspectional Services Department, Housing Authority or other agency, governmental entity, business, or person in the last 6 years of the tenancy, including, but not limited to:
   1. The date of the inspection;
   2. What agency/person conducted the inspection;
   3. The identity of the person who contacted the agency to perform the inspection and the date of the contact;
   4. The date and substance of any report received from the agency;
   5. The date and substance of any communications with the inspector or other representatives of the agency; and
   6. What, if anything, you did in response to the inspection or report.
9. {%p endif %}
10. {%p if interrogatories[“purchase\_inspection\_details”] %}
11. If the Landlord before, at the time of, or immediately following the purchase or acquisition of the apartment or building, obtained any inspections or evaluations of the apartment or building, for each such inspection or evaluation state:
    1. The date;
    2. The name, address, email, and telephone number of the person who or agency that performed it;
    3. When the Landlord received or became aware of the inspection, assessment, or evaluation;
    4. The contents thereof, stating specifically what problems or conditions were noted; and
    5. What, if anything, the Landlord did in response to such inspection, assessment, or evaluation.
12. {%p endif %}
13. {%p if interrogatories[“inspection\_repair\_history”] %}
14. If the Landlord has made or attempted to make inspections or repairs, or both (including exterminations) to the Tenant’s apartment, common areas, or systems of the building, within the most recent 6 years of the Tenant’s occupancy, for each such inspection or repair, or attempt at either, including extermination, please state:
    1. A description of each inspection or repair;
    2. How and when the Landlord let the Tenant know of the plan to inspect or repair (including whether there was written notice to the Tenant);
    3. The date of each inspection or repair;
    4. The name, address, email, and telephone number of the company or person who made each inspection or repair;
    5. If applicable, the cost of each inspection or repair; and
    6. For repairs, how and when the Landlord first knew of the condition that needed to be repaired.
15. {%p endif %}
16. {%p if interrogatories[“lead\_paint\_information”] %}
17. If the Landlord has ever learned of or tried to discover whether there was lead paint in the Tenant’s apartment or building, or both, please provide:
    1. A full and complete description of the Landlord’s investigation or knowledge and information regarding the presence or absence of lead paint in the apartment or building, or both, including, but not limited to:
       1. The substance of any inspections, investigation, or knowledge and information;
       2. The name, address, email, and telephone number of any person or company with information;
       3. The date(s) that the Landlord conducted such investigation or acquired such knowledge and information;
    2. A full and complete description of any steps taken regarding the presence of lead paint in the apartment or building, or both, (i.e., any and all inspections not identified above or abatement of any lead paint hazard), including, but not limited to:
       1. The substance of all action taken or work performed;
       2. The date(s) thereof;
       3. Who did what work (name, address, company, email, telephone number, and license number of the deleader);
       4. The details of any arrangements for relocation of the Tenant during the lead abatement process (including where the Tenant was relocated, and the amount(s) of any expenses associated with such relocation, including who paid for the expense, and how and when each such cost was paid).
18. {%p endif %}
19. {%p if interrogatories[“tenant\_damage\_claims”] %}
20. If the Landlord claims that the Tenant caused any damage to the apartment or building, please describe such damage in full and complete detail, including, but not limited to:
    1. A description of such damage;
    2. Why the Landlord believes the Tenant caused the damage;
    3. What if any repairs were made to such damage, the date(s) of such repairs, and the costs of such repairs; and
    4. The name(s), address(es), email(s) and telephone number(s) of anyone with knowledge of such damage allegedly caused by the Tenant.
21. {%p endif %}
22. {%p if interrogatories[“tenant\_interference\_with\_repairs”] %}
23. If the Landlord claims the Tenant prevented or interfered with inspections or repairs to the apartment, for each attempt to inspect or make repairs, please describe:
    1. The date of the attempt;
    2. How and when the Landlord let the Tenant know of the plan to inspect or to repair, or both;
    3. What the Tenant did or said to prevent or hinder the inspection or repair;
    4. The names and addresses of anyone present at the time who has information about the Tenant’s interference with the inspection or repair;
    5. The date and description of any attempt(s) you made to reschedule such inspection or repair; and
    6. Any financial or other loss suffered as a result of the Tenant’s actions or inactions.
24. {%p endif %}
25. {%p if interrogatories[“landlord\_access\_to\_apartment”] %}
26. If the Landlord, or anyone on the Landlord’s behalf, has been inside the Tenant’s apartment within the most recent 6 years of the tenancy (or before the tenancy for the purpose of renting the apartment), please state who was inside the apartment, when, and why they were there, and whether the Tenant or anyone else was present at the time.
27. {%p endif %}

{%p if interrogatories.any\_in\_category("Utilities") %}

Utilities

{%p endif %}

1. {%p if interrogatories[“tenant\_utility\_billing”] %}
2. Please describe how each utility (heat, hot water, cooking fuel if applicable, electricity, and water) for the apartment is or has been billed, i.e. whether to the Landlord or to the Tenant, and the applicable period of time for which each utility has been or was billed to the Tenant or to the Landlord.
3. {%p endif %}
4. {%p if interrogatories[“utilities\_and\_billing”] %}
5. Please describe any written agreement requiring the Tenant to pay for water, heat, hot water or electricity for the apartment and/or any additional area(s) of the building, including the substance and date of the agreement, and the date the obligation to pay for any such utility took effect (specifying each utility).
6. {%p endif %}
7. {%p if interrogatories[“utility\_disconnection\_details”] %}
8. If any of the Tenant’s utilities (water, gas, or electricity) have ever been shut off, discontinued, or threatened to be shut off or discontinued, or both (by you, a utility company, or anyone else), state which utility and when, the reason for the shutoff or notice or threat of the shutoff, and, if applicable, when and how the utility was turned back on.
9. {%p endif %}
10. {%p if interrogatories[“common\_area\_utility\_accounts”] %}
11. Please describe any accounts that the Landlord has or has had for common area utility usage (including water and sewer) in the building, including the date such account was established, the name of the utility company, the account number for each such account, and a description of the areas in the building covered by each such account.
12. {%p endif %}
13. {%p if interrogatories[“tenant\_outside\_utility\_responsibility”] %}
14. If the Tenant is or was at any time responsible for paying for any water, electricity, or other utility outside the apartment, including, but not limited to, hallways, the basement, or the exterior of the building, please describe what the Tenant is responsible for, whether there is a written agreement between the parties reflecting this arrangement, and the date such arrangement first took effect.
15. {%p endif %}

{%p if interrogatories.any\_in\_category("Facts About the Landlord") %}

Facts About the Landlord

{%p endif %}

1. {%p if interrogatories[“rental\_properties\_owned”] %}
2. Please list all rental property, including the property involved in this case, that the Landlord owns or has owned at any point during the Tenant’s tenancy in the apartment (including any property owned by trust or business entities with which you are associated) and *for each such property*:
   1. Identify the address;
   2. State the number of apartments in each such property; and
   3. State the purchase date and dates of ownership.
3. {%p endif %}
4. {%p if interrogatories[“ownership\_entity\_details”] %}
5. If the owner of the Tenant’s apartment is a trust or company or other kind of business entity, please describe the entity in detail, including, but not limited to:
   1. The name and type of the trust or company;
   2. The names of the trustees or managers/principals, and any changes thereto (including all applicable dates); and
   3. The names of the beneficiaries of the trust, and any changes thereto (including all applicable dates).
   4. What if any written by-laws, articles or other documents pertain to the entity.
6. {%p endif %}
7. {%p if interrogatories[“landlord\_sale\_plan”] %}
8. If you (or the owner of the apartment) have any intention of selling the apartment or the building, please describe any all actions taken toward such sale, including but not limited to whether (and when) the building has been marketed and/or appraised for sale, the date(s) and substance of any communications or agreements you have with a broker and/or potential buyer(s), the identity of any broker(s) with whom you have had communicated or contracted relative to sale, the identity of any interested purchasers, whether any offer(s) for purchase have been made, and whether any purchase and sale agreement has been exchanged and/or signed.
9. {%p endif %}
10. {%p if interrogatories[“fair\_market\_rental\_value”] %}
11. For each month that the Tenant has occupied the apartment, please state your opinion if any of its fair market rental value in compliance with all applicable codes and regulations, including in your answer the factual basis for such opinion.
12. {%p endif %}

{%p if interrogatories.any\_in\_category("Other") %}

Other

{%p endif %}

1. {%p if interrogatories[“tenant\_organization\_involvement”] %}
2. If you knew or believed that the Tenant went to a tenants’ meeting or participated in a tenants’ organization, or if the Tenant took action to assert their rights (including but not limited to reporting conditions in need of repair to a town or city or agency, or filing or threatening to file a lawsuit against you), please describe the date(s) and substance of each such action and how you became aware of it.
3. {%p endif %}
4. {%p if interrogatories[“eviction\_proceedings”] %}
5. Please list all summary process/eviction proceedings, or any other lawsuits, you have commenced against the Tenant (including any notices to quit or other notices to terminate the tenancy even if they did not result in a court case being filed). For each such proceedings, state, if applicable:
   1. The date the notice to quit was served on the Tenant;
   2. The date the summons and complaint was served on the Tenant;
   3. The reason for the eviction in the Notice to Quit;
   4. The reason for the eviction even if not stated in the Notice to Quit; and
   5. How the eviction case or lawsuit was resolved.
6. {%p endif %}
7. {%p if interrogatories[“lock\_changes\_and\_exclusion”] %}
8. If the Landlord ever changed the locks to the apartment or building (or any common area) such that the Tenant was unable to enter at the time of such change, notified the Tenant of the intent to do so, or took any other action to exclude the Tenant from the apartment or building (or any part thereof), please describe such action(s) in detail, including but not limited to the date of such lock change or other action, the persons involved, the date and substance of the notice to the Tenant, and the reasons for your action(s).
9. {%p endif %}

DOCUMENT REQUESTS

{%p if document\_requests.any\_in\_category("Tenancy") %}

Tenancy

{%p endif %}

1. {%p if document\_requests[“rental\_documents\_general”] %}
2. Any documents related to the rental of the apartment or to the tenancy, or both, including, but not limited to, rental applications, credit checks, references, lease(s) or other written agreement(s) between the Landlord and the Tenant, and lease addenda, changes, or renewals.
3. {%p endif %}
4. {%p if document\_requests[“tenant\_landlord\_written\_communications”] %}
5. All letters, texts, emails, notices and other written communications between the Landlord and the Tenant.
6. {%p endif %}
7. {%p if document\_requests[“tenant\_landlord\_communications\_others”] %}
8. All letters, texts, emails, notices and other written communications between the Landlord and anyone else (other than the Landlord’s attorney) regarding the Tenant or the tenancy.
9. {%p endif %}
10. {%p if document\_requests[“landlord\_internal\_communications”] %}
11. All internal communications (amongst the Landlord and its staff, agents or representatives) regarding the Tenant or the tenancy.
12. {%p endif %}
13. {%p if document\_requests[“rent\_payment\_records\_all”] %}
14. All written records kept by the Landlord concerning payments for rent or use and occupancy made by or on behalf of the Tenant.
15. {%p endif %}
16. {%p if document\_requests[“charges\_other\_than\_rent”] %}
17. All written records kept by the Landlord concerning charges to the Tenant for anything other than rent or use and occupancy, including any payments for such charges made by or on behalf of the Tenant.
18. {%p endif %}
19. {%p if document\_requests[“tenant\_file\_documents”] %}
20. All documents in any tenant file that the owner or manager maintains for the Tenant.
21. {%p endif %}
22. {%p if document\_requests[“rent\_increase\_documents”] %}
23. All documents regarding rent increases or requests for rent increases related to the tenancy.
24. {%p endif %}
25. {%p if document\_requests[“documents\_from\_previous\_owners”] %}
26. All documents received from any predecessor(s) in interest (people or business(es) that owned the building before you did) related to the building, including, but not limited to, documents about:
    1. The condition of the building;
    2. Tenancies at the building;
    3. Assignments of rights or obligations; and
    4. Security deposits and last months’ rents.
27. {%p endif %}
28. {%p if document\_requests[“tenant\_claim\_related\_documents”] %}
29. All documents related in any way to the Tenant’s claims or to the Landlord’s defenses or counterclaims (to the extent not addressed elsewhere in your responses to these document requests).
30. {%p endif %}
31. {%p if document\_requests[“documents\_for\_trial”] %}
32. All documents the landlord plans to present at trial.
33. {%p endif %}

**{%p if document\_requests.any\_in\_category("Facts About the Landlord") %}**

**Facts About the Landlord**

**{%p endif %}**

1. {%p if document\_requests[“management\_agreements”] %}
2. Any documents concerning the management of the apartment or building, or both (including management contract(s) applicable to the period of the Tenant’s occupancy, postings at the building regarding the owner or responsible managing agent, and any other management documents concerning the tenancy).
3. {%p endif %}
4. {%p if document\_requests[“maintenance\_logs\_and\_records”] %}
5. Any documents concerning the maintenance of the apartment or building, or both, in relation to the tenancy.
6. {%p endif %}
7. {%p if document\_requests[“landlord\_purchase\_refinance\_documents”] %}
8. All documents concerning the Landlord’s purchase or refinancing of, or mortgage for, the apartment or building, including, but not limited to, inspection reports and other assessments or evaluations, purchase and sale agreements (and other documents concerning conditions of purchase, broker or other agreements, tenant or seller estoppel certificates, and the like.
9. {%p endif %}
10. {%p if document\_requests[“sale\_related\_documents”] %}
11. Any documents concerning the anticipated or actual sale of the building, including but not limited to marketing-related documents, appraisals, inspection reports and other assessments/evaluations, purchase and sale agreements (and other documents concerning conditions of purchase/sale), broker agreements, estoppel certificates and any written communications (including e.g. letters, emails or texts) related to purchase/sale, and the like.
12. {%p endif %}

{%p if document\_requests.any\_in\_category("Subsidized Housing") %}

Public and Subsidized Housing/Rental Assistance

{%p endif %}

1. {%p if document\_requests[“subsidized\_housing\_documentation”] %}
2. All written documents concerning the exact type or nature of any rental subsidy attached to the building or involved in the tenancy.
3. {%p endif %}
4. {%p if document\_requests[“contract\_rent\_increase\_requests”] %}
5. All documents concerning any request the Landlord has made for an increase in the contract rent and responses to that request from the Tenant or agency administering the tenant’s subsidy, or both.
6. {%p endif %}
7. {%p if document\_requests[“conference\_and\_grievance\_documents”] %}
8. All documents related to any informal conference or grievance hearings, or both, during the tenancy.
9. {%p endif %}
10. {%p if document\_requests[“agency\_communications”] %}
11. All letters and other written communications between the Landlord and any housing authority, EOHLC, MassHousing, HUD, or any other agency regarding the Tenant or the apartment.
12. {%p endif %}
13. {%p if document\_requests[“rental\_assistance\_records”] %}
14. All documents related to rental assistance (or other subsidy or financial assistance, whether from RAFT, Home Base, or any other program or charity) for the tenant’s rent/use and occupancy for the apartment, including for example documents reflecting request(s), your response(s), or other communications, and any documents exchanged concerning such assistance.
15. {%p endif %}

{%p if document\_requests.any\_in\_category("Problems with the Apartment/Building") %}

Problems with the Apartment/Building

{%p endif %}

1. {%p if document\_requests[“inspection\_notices\_and\_reports”] %}
2. All documents notifying the Tenant of inspections or repairs, or both, to the apartment or building, or both.
3. {%p endif %}
4. {%p if document\_requests[“photographic\_evidence”] %}
5. All photographs, videos, or digital images of the Tenant’s apartment or of the building, or both, at any time during the tenancy, or within two (2) weeks before the Tenant moved in.
6. {%p endif %}
7. {%p if document\_requests[“lead\_paint\_investigation”] %}
8. All documents related to investigation for or the presence of lead paint at any time in the Tenant’s apartment or in the building, or both, including, but not limited to, notices to any tenants in the building, notices from any agency about lead paint, and documents related to lead paint inspections, verifications of lead paint abatement or control of lead paint, or both, and tenant relocation.
9. {%p endif %}
10. {%p if document\_requests[“condition\_inspection\_reports”] %}
11. All documents concerning conditions in the Tenant’s apartment, the common areas, or systems of the building, or all, including, but not limited to, complaints, inspection reports, and requests for repairs by the Tenant or any other person or agency, or all.
12. {%p endif %}
13. {%p if document\_requests[“repair\_invoices\_and\_records”] %}
14. All documents relating to repairs of the apartment, common areas, or systems of the building, or all, including, but not limited to, invoices, estimates, bills, work orders, receipts, and records of payment.
15. {%p endif %}
16. {%p if document\_requests[“rental\_value\_assessments”] %}
17. All documents related to the basis of the Landlord’s opinion regarding the fair market monthly rental value of the apartment.
18. {%p endif %}

{%p if document\_requests.any\_in\_category("Utilities") %}

Utilities

{%p endif %}

1. {%p if document\_requests[“utility\_payment\_responsibility”] %}
2. All documents concerning who is or was at any time during the tenant’s occupancy responsible for payment of water and sewer, heat, hot water, and electricity, or any other utilities in the apartment.
3. {%p endif %}
4. {%p if document\_requests[“utility\_termination\_notices”] %}
5. Any documents concerning the threatened or actual termination or re-connection of utilities (including water and sewer, electricity, or gas) in the apartment or building.
6. {%p endif %}
7. {%p if document\_requests[“common\_area\_utility\_accounts”] %}
8. Any documents concerning accounts that the Landlord has or has had for common area water and other utility usage in the building.
9. {%p endif %}
10. {%p if document\_requests[“tenant\_outside\_utility\_documents”] %}
11. Any documents concerning the Tenant’s responsibility for payment of any water, electricity, or other utility outside the apartment, including, but not limited to, hallways, the basement, or the exterior of the building at any time during occupancy.
12. {%p endif %}

**{%p if document\_requests.any\_in\_category("Other") %}**

**Other**

**{%p endif %}**

1. **{**%p if document\_requests[“property\_insurance\_policies”] %}
2. Any documents concerning fire, property, or liability insurance of the apartment or building, including, but not limited to, policies, binders, contracts, agreements, vouchers, checks, notices, correspondence, and notices to the landlord’s insurer of claims concerning the apartment or building.
3. {%p endif %}
4. {%p if document\_requests[“legal\_claims\_documents”] %}
5. Any documents concerning lawsuits or claims, or both, related to the apartment or building, or both, or involving the Landlord and Tenant.
6. {%p endif %}