IN THE CIRCUIT COURT OF THE STATE OF OREGON

FOR THE COUNTY OF {{ case.juris.county }}

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| {{p include\_docx\_template(‘prod\_caption1.docx’) }} | Case No. {{ case.number }}  **{{ possessify(lawfirms[0].clientlist(case).asnoun(), ‘response’) }} to {{ possessify(parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun(), ordinal\_rfp) }} request for production of documents** |

TO: {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun() }} {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)) }} and {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).pronoun\_possessive(‘’) }}{{ case.attorneys\_of\_list(parties.rrfp\_recipients(lawfirms[0].clientlist(case))).as\_noun(‘attorneys’) }}, {{ comma\_and\_list(case.attorneys\_of\_list(parties.rrfp\_recipients(lawfirms[0].clientlist(case)))) }}.

Pursuant to ORCP 43, {{ lawfirms[0].clientlist(case).asnoun() }} {{ lawfirms[0].clientlist(case).does\_verb(‘respond’) }} to {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun() }} {{ possessify(comma\_and\_list(parties.rrfp\_recipients(lawfirms[0].clientlist(case))), ordinal\_rfp) }}Request for Production of Documents to {{ lawfirms[0].clientlist(case).asnoun() }} as follows:

**GENERAL OBJECTIONS**

1. {{ lawfirms[0].clientlist(case).asnounobjects() }}to all requests to the extent {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun() }} {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).does\_verb(‘seek’) }} information protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege.
2. {{ lawfirms[0].clientlist(case).asnounobjects() }}to any portion of these requests that contain instructions, directions, provisions, or definitions that are inconsistent with or more onerous than the requirements of the Oregon Rules of Civil Procedure.
3. {{ lawfirms[0].clientlist(case).asnounobjects() }}to any request to the extent it seeks the production of documents that are not currently in its possession, custody, or control.
4. {{ possessify(lawfirms[0].clientlist(case).asnoun(), ‘’) }}investigation and discovery are continuing. {{ lawfirms[0].clientlist(case).asnoun() }} therefore {{ lawfirms[0].clientlist(case).does\_verb(‘reserve’) }} the right to supplement {{ lawfirms[0].clientlist(case).pronoun\_possessive(‘’) }}responses after additional discovery has taken place.
5. {{ lawfirms[0].clientlist(case).asnoun() }} {{ lawfirms[0].clientlist(case).does\_verb(‘is’) }} responding in good faith to these requests as {{ lawfirms[0].clientlist(case).asnoun() }} {{ lawfirms[0].clientlist(case).does\_verb(‘interpret’) }} and {{ lawfirms[0].clientlist(case).does\_verb(‘understand’) }} them. If {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun() }} subsequently {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).does\_verb(‘assert’) }} an interpretation of any request that differs from {{ possessify(lawfirms[0].clientlist(case).asnoun(), ‘’) }}understanding, {{ lawfirms[0].clientlist(case).asnoun() }} {{ lawfirms[0].clientlist(case).does\_verb(‘reserve’) }} the right to supplement {{ lawfirms[0].clientlist(case).pronoun\_possessive(‘’) }}responses or objections.
6. Each of these general objections is incorporated into each of {{ possessify(lawfirms[0].clientlist(case).asnoun(), ‘’) }}specific responses below.

RESPONSES

{{r request.facite\_rrfps(lawfirms[0], parties.rrfp\_recipients(lawfirms[0].clientlist(case)), prior\_rfps\_count, case) | inline\_markdown }}

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| Dated: September 6, 2021. |
| {{ lawfirms[0] | upper }}  By: |
| {%p for atty in case.attorneys\_for(lawfirms[0]) %}  {{ atty }}, OSB No. {{ atty.osb }}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }} for {{ lawfirms[0].clientlist(case).asnoun() }}  Trial {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }}: Same |
| {%tr for pair in lawfirms[0].pair\_firms(lawfirms, parties) %} |
| {{ pair | upper }}  By: |
| {%p for atty in case.attorneys\_for(pair) %}  {{ atty }},{% if atty.pro\_hac\_vice %} *pro hac vice*  {{ state\_name(atty.barred\_in) }} State Bar No. {{ atty.bar\_no }}{% else %} OSB No. {{ atty.osb }} {% endif %}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }} for {{ lawfirms[0].clientlist(case).asnoun() }}  Trial {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }}: Same |
| {%tr endfor %} |

CERTIFICATE OF SERVICE

I hereby certify that on September 6, 2021, I served the foregoing *{{ possessify(lawfirms[0].clientlist(case).asnoun(), ‘Response’) }} to {{ possessify(parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun(), ordinal\_rfp) }} Request for Production of Documents*on {{ case.attorneys\_of\_list(parties.rrfp\_recipients(lawfirms[0].clientlist(case))).as\_noun(‘attorney’) }} for {{ parties.rrfp\_recipients(lawfirms[0].clientlist(case)).asnoun() }} at the address{% if parties.rrfp\_recipients(lawfirms[0].clientlist(case)) | length >=2 %}es{% endif %} below and by the following indicated method or methods:

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| {%tc for firm in lawfirms.parse\_firms(parties) %} | {%p for atty in case.attorneys\_for(firm) %}  {{ atty }}  {%p endfor %}  {{ firm }}  {{ firm.address.block() }}  {%p for pair in firm.pair\_firms(lawfirms, parties) %}  {%p for atty in case.attorneys\_for(pair) %}  {{ atty }}  {%p endfor %}  {{ pair }}  {{ pair.address.block() }}  {%p endfor %}  {%p for pair in firm.pair\_firmz(lawfirms, parties) %}  {%p for atty in case.attorneys\_for(pair) %}  {{ atty.email | lower }}  {%p endfor %}  {%p endfor %}  *{{ capitalize(firm.lawyers\_as\_friends(lawfirms, parties, case)) }} for {{ firm.clientlist(case).asnoun() }} {{ comma\_and\_list(case.clients\_of(firm)) }}* | {%tc endfor %} |

By serving through **OJD File & Serve** if said attorney(s) were registered for such service on the date set forth below. If said attorney(s) were not registered for service through OJD File & Serve, then by:

**Mail** in sealed, first-class postage-prepaid envelopes, addressed to the attorney as shown above, the last-known office addresses of the attorney, and deposited with the United States Postal Service at {{ lawfirms[0].address.city }}, {{ lawfirms[0].address.state }}, on the date set forth below.

**Hand-delivery** to the attorneys of record at the courthouse, their office or current place of business on the date set forth below.

**Fax** to the attorneys at the fax numbers shown above, which are the last-known fax numbers for the attorneys' offices, on the date set forth below.

**E-mail** to the attorneys at the e-mail addresses shown above, which are the last-known e-mail addresses for the attorneys' offices, on the date set forth below.

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| Dated: September 6, 2021. |
| {{ lawfirms[0] | upper }}  By: |
| {%p for atty in case.attorneys\_for(lawfirms[0]) %}  {{ atty }}, OSB No. {{ atty.osb }}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }} for {{ lawfirms[0].clientlist(case).asnoun() }}  Trial {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }}: Same |
| {%tr for pair in lawfirms[0].pair\_firms(lawfirms, parties) %} |
| {{ pair | upper }}  By: |
| {%p for atty in case.attorneys\_for(pair) %}  {{ atty }},{% if atty.pro\_hac\_vice %} *pro hac vice*  {{ state\_name(atty.barred\_in) }} State Bar No. {{ atty.bar\_no }}{% else %} OSB No. {{ atty.osb }} {% endif %}  {{ atty.email | lower }}  {%p endfor %}  Of {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }} for {{ lawfirms[0].clientlist(case).asnoun() }}  Trial {{ capitalize(lawfirms[0].lawyers\_as\_friends(lawfirms, parties, case)) }}: Same |
| {%tr endfor %} |