

# **Discovery Pack**

## **Discovery Requests**

### **INTERROGATORIES:**

1. Identify each person who handled Plaintiff's dispute(s) and describe their role.
2. Describe policies and procedures used to investigate FCRA disputes.
3. Explain each step taken in response to Plaintiff's dispute(s), with dates.

### **REQUESTS FOR PRODUCTION:**

1. All ACDV/e-OSCAR records and dispute results for Plaintiff.
2. All communications with any CRA concerning Plaintiff.
3. All policies, manuals, and training for FCRA investigations.

### **REQUESTS FOR ADMISSION:**

1. Admit the reported information was inaccurate.
2. Admit no reasonable investigation was conducted.