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FAIRS ARE US, INC. and COUNTY OF SIERRA

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**COUNTY OF SIERRA**

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| JOHN DOE  Plaintiff,  vs.  FAIRS ARE US, INC., COUNTY OF SIERRA, and DOES 1 through 25, inclusive,  Defendants. |  | Case No. CGG-24-555555  Action Filed: January 5, 2024  Trial Date: TBD  **DEFENDANT FAIRS ARE US INC.’S REQUESTS FOR PRODUCTION, SET ONE** |

Propounding Party: Defendant FAIRS ARE US, INC.

Responding Party: Plaintiff JOHN DOE

Set No.: ONE

**TO PLAINTIFF AND HIS ATTORNEYS OF RECORD:**

Pursuant to California Code of Civil Procedure § 2031.010, Defendant FAIRS ARE US, INC. (“Defendant”) serves this Demand for Production of Documents, Set No. One, upon Plaintiff JOHN DOE (“Plaintiff”), and requests that Plaintiff produce and permit Defendant to inspect and copy the documents, writing, and other tangible things designated below.

The material requested shall be produced for inspection and copying by the propounding party within thirty (30) days after service at 10:00 a.m. at the law offices of Oraclaim Partners LLP, 335 Elm Street, Suite 350, San Francisco, California, 94111, telephone: (415) 555-4600. In lieu of permitting the inspection and copying of original documents on that date, copies of the responsive documents and other original prints of photographs may be sent to the attorneys for Defendant to be received by the date of production. The materials produced shall either be (1) produced as they are kept in the usual course of business, or (2) organized and labelled with exhibit numbers which correspond to each request so that said response will accurately show the specific categories of materials produced by Plaintiff or the absence thereof.

If the original of a document, writing or other tangible thing is within your possession, custody, or control, produce it; if not, produce such copy of it as is in your possession, custody or control. Any copy which has any notation, addition, modification, alteration, or change is to be treated as constituting an additional original.

**DEFINITION OF TERMS**

1. “DOCUMENT” or “DOCUMENTS” means a writing, as defined in Evidence Code § 250, and includes the original or a copy of handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored.
2. “YOU” or “YOUR” refers to the plaintiff, his agents, his employees, his insurance companies, their agents, their employees, his attorneys, his accountants, his investigators, and anyone else acting on his behalf.
3. “INCIDENT” refers to the circumstances and events described in Plaintiff’s complaint, which give rise to this action.
4. “THIS LITIGATION,” “THIS LAWSUIT,” or the “COMPLAINT” all refer to the civil action described in the caption and on this pleading.

**REQUESTS FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. :**

YOUR Driver’s License or Identification Card.

**REQUEST FOR PRODUCTION NO. :**

YOUR Social Security Card.

**REQUEST FOR PRODUCTION NO. :**

Any and all diplomas or certificates of completion for any kind of education YOU have received since 1995.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS related to any kind of occupational training YOU have received since 1995.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS related to any kind of vocational rehabilitation YOU have received since 1995.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS related to any kind of vocational rehabilitation consultation YOU have had since the date of the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS relating to or evidencing YOUR service in any branch of the United States military or the military service of any foreign country.

**REQUEST FOR PRODUCTION NO. :**

Any and all employment records from any of YOUR past employers.

**REQUEST FOR PRODUCTION NO. :**

Any and all employment records from YOUR current employer(s).

**REQUEST FOR PRODUCTION NO. :**

Any and all disciplinary records for any of YOUR employers from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all weekly meeting logs for any of YOUR employers from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all overtime records for any of YOUR employers from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all incident reports for any of YOUR employers from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all notices of discharge for any of your employers from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS related to employment agreements YOU have entered into since the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS concerning unemployment benefits YOU have sought from any entity, including federal or state governments or private companies, from 2007 to present (including but not limited to, unemployment compensation applications, correspondence, statement of benefits, acceptance or rejection of benefits, payments received, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS concerning disability benefits YOU have sought from any entity, including federal or state governments or private companies, from 2007 to present (including but not limited to, disability compensation applications, correspondence, statement of benefits, acceptance or rejection of benefits, payments received, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS showing any income you have earned from 2007 to present (including but not limited to, check stubs, W-2 Statements, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS showing any income YOU received from any source other than Defendant from 2007 to present (including but not limited to, every financial statement, profit and loss statement, earnings statement, or checking account register).

**REQUEST FOR PRODUCTION NO. :**

Every state and/or federal tax return which YOU have filed from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

YOUR most recent Social Security Earnings Statement.

**REQUEST FOR PRODUCTION NO. :**

YOUR Social Security Earnings Statement from the year prior to the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which support YOUR claim of lost earnings.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which support YOUR claim of loss of earning capacity.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS regarding YOUR membership in each and every union of which YOU were a member at the time of the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all union dispatch slips related to YOUR work for any employer from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all union discharge slips related to YOUR work for any employer from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which depict the scene of the INCIDENT and/or any locations adjacent thereto (including but not limited to, photographs, videos, films, diagrams, charts or others).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which depict any object involved in the INCIDENT (including but not limited to, photographs, videos, films, or others).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which depict any injury involved in the INCIDENT (including but not limited to, photographs, videos, films, or others).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which contain a description of the INCIDENT, (including but not limited to, incident reports, doctor’s first report of work injury, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which contain a written statement related in any way to the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which contain a recorded statement related in any way to the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which transcribe or record any oral statement made by any person describing the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS related to any and all medical or physical exams that YOU have undergone related to YOUR work with any employer from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which pertain to the diagnosis and treatment of the physical injuries which YOU contend that YOU sustained in the INCIDENT (including but not limited to, medical bills or statements, medical reports, other medical or hospital records, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS reflecting YOUR fitness to work (fit-for-duty-status) since the date of the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS that support your claim for future medical expenses in connection with the INCIDENT giving rise to this LITIGATION.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS that support your claim for past medical expenses in connection with the INCIDENT giving rise to this LITIGATION.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS pertaining to medical treatment for the part(s) of YOUR body claimed to have been injured in the INCIDENT, whether or not such records were created before or after the date of the INCIDENT (including but not limited to, medical records, bills, reports, x-rays and other radiographic studies).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS prepared by YOU and pertaining in any way to YOUR injuries alleged in the COMPLAINT (including but not limited to, notes, diary entries, log book entries, calendar entries, daytimer/personal planner entries, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS reflecting any item of damages claimed in the COMPLAINT (including but not limited to, bills, invoices, statements, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS that support your claim for general damages in connection with the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which support YOUR claim of Defendant’s negligence as YOU allege in the COMPLAINT.

**REQUEST FOR PRODUCTION NO. :**

Any and all retirement DOCUMENTS that YOU submitted to any entity (including but not limited to, unions or employers).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which describe any pension plans YOU have been enrolled in from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which describe any disaibility plans YOU have been enrolled in from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS which describe any retirement plans YOU have been enrolled in from 2007 to present.

**REQUEST FOR PRODUCTION NO. :**

Any and all medical insurance policies that provide coverage for the injuries alleged in YOUR COMPLAINT.

**REQUEST FOR PRODUCTION NO. :**

Any and all physical evidence concerning the INCIDENT in your care, custody, or control.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS that YOU contend support your claim of Jones Act Seaman status at the time of the INCIDENT.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS that refer to or reflect YOUR recreational pursuits since the INCIDENT (including but not limited to, emails, tickets, and receipts related to vacation travel, concerts, sports venues, hobbies, or other).

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS and things you described in your response to Special INTERROGATORY NO. 27.

**REQUEST FOR PRODUCTION NO. :**

Any and all DOCUMENTS and things you described in your response to Special INTERROGATORY NO. 30.

Dated: July 16, 2024 ORACLAIM PARTNERS LLP

Attorneys for Defendant

FAIRS ARE US, INC.

By:\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Robert T. Brown