

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

[CONSUMER],

v. Plaintiff,
CIVIL NO. [redacted]

EQUIFAX INFORMATION SERVICES, L.L.C., et als.,

Defendants.

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
TO TRANS UNION, L.L.C. AND EXPERIAN INFORMATION SOLUTIONS, INC.**

Pursuant to the Federal Rules of Civil Procedure, Plaintiff, by counsel, propounds the following Request for Production of Documents to Defendants, TRANS UNION, L.L.C. and EXPERIAN INFORMATION SOLUTIONS, INC., to be answered under oath within the time prescribed by the Federal Rules of Civil Procedure.

REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE, that pursuant to F.R.C.P. 34, the plaintiff, by counsel, requests that you produce in ORIGINAL form for the purposes of inspection, copying and/or testing, the documents described below. Such documents are to be produced at the offices of plaintiff's counsel within the time prescribed by the Federal Rules of Civil Procedure.

1. Produce all documents identified in your answers to Plaintiff's First Set of Interrogatories.

RESPONSE:

2. Produce all documents in your possession with regard to the Plaintiff or the subject of this suit.

RESPONSE:

3. Produce all correspondence between you and any co-defendant or the Plaintiff,

which regard the subject of this lawsuit or the Plaintiff.

RESPONSE:

4. Produce all documents which were mailed or otherwise delivered to you by the Plaintiff or by any co-defendants which regard the subject of this lawsuit or the Plaintiff.

RESPONSE:

5. Produce all documents or exhibits which you intend to produce at trial.

RESPONSE:

6. Produce all documents which detail or describe your procedures for compliance with 15 U.S.C. §1681e or §1681i, since January 1, 2001.

RESPONSE:

7. Produce all documents which contain the plaintiff's name, social security number, and/or address.

RESPONSE:

8. Produce all manuals which describe, detail or explain the operation of or any codes within any computer program or software in which data has been compiled, created stored or organized pertaining to the plaintiff or any account(s) attributed or related to him.

RESPONSE:

9. Produce all documents pertaining to or containing explanation(s), instruction(s) or procedure(s) for your reporting of credit information or investigation of credit information disputes.

RESPONSE:

10. Produce all manuals, instructional materials, training videos or tapes or other documents provided by you to CITIFINANCIAL which pertain to its credit reporting procedures and/or compliance with the Federal Fair Credit Reporting Act.

RESPONSE:

11. All documents regarding the compiling, obtaining, gathering, evaluation, accuracy checking, deleting, modifying or investigation of your public records bankruptcy data.

RESPONSE:

12. Produce the personnel file(s) of each employee who has ever conducted an investigation or reinvestigation of any information ever placed in the plaintiff's file or regarding the Plaintiff or any account which CITIFINANCIAL had attributed to him.

RESPONSE:

13. Produce every manual or other document which explains and/or describes when, how and under what circumstances you archive, retain or capture data in any file bearing any of plaintiff's personal identifiers.

RESPONSE:

14. All documents regarding your procedures for reconciling your public records data with your account tradeline data.

RESPONSE:

15. Produce each Consumer Dispute Verification or Automated Consumer Dispute Verification [CDV or ACDV] communication or other dispute communication you generated, used or received regarded the plaintiff or any of his personal identifiers.

RESPONSE:

16. Produce for each fact witness or expert witness you believe may have knowledge of any of the facts, events, or matters that are alleged in plaintiff's complaint, your answer, anticipated answer and/or defenses thereto and/or may have formed any opinion or consulted with you about the facts or basis of this lawsuit or any defense or allegation you have raised in this lawsuit, produce a copy of any affidavit, deposition, transcript, or report which contains the testimony or opinion(s) of such witness and which has been previously furnished to the court or opposing counsel in such case.

RESPONSE:

17. Produce all documents prepared by or on behalf of the defendant used in connection with the training, instruction, supervision or evaluation of any of your employees or of any third party paid by you identified in your responses to these interrogatories.

RESPONSE:

18. Produce your annual report issued for either the fiscal or calendar years 2002, 2003 and 2004. (In lieu of producing such documents, you may produce a written stipulation of the amount of your Net Worth as of January 1, 2004).

RESPONSE:

19. All documents regarding your relationship with any public record vendor you have used since January 1, 2003.

RESPONSE:

20. Produce any document which you have regarding the establishment, maintenance, implementation, improvement or modification of investigation procedures or of procedures related to the submission and accuracy of data by CITIFINANCIAL to you through Metro 1 or Metro 2.

RESPONSE:

21. Produce each Universal Data Form or Automated Universal Data Form [UDF or AUDF] communication you have ever received which pertained to the plaintiff or any of his personal identifiers.

RESPONSE:

22. Produce the Complaint filed against you in every lawsuit in which you have been sued for your alleged violation of 15 U.S.C. §1681e or §1681i in which CITIFINANCIAL was a co-defendant or in which the consumer's allegations were based upon or pertaining to a CITIFINANCIAL account.

RESPONSE:

23. Produce every document, internal memorandum, e-mail or other electronic communications through which you or your employees discussed your maintenance, modification and/or creation of your reinvestigation procedures.

RESPONSE:

24. Please produce all contracts, invoices, agreements, memos, letters, manuals, emails, or any other documents exchanged between you and your Virginia public records vendors, other than those documents which have been generated through the process of obtaining and reinvestigating the public records data for specific consumers.

RESPONSE:

25. Produce any settlement agreement in which you have been a party which disposed of any lawsuit in which you have been sued for your alleged violation of 15 U.S.C. §1681i or §1681e and in which CITIFINANCIAL was a co-defendant or in which the consumer's allegations were based upon or pertaining to an CITIFINANCIAL account.

RESPONSE:

26. Produce any documents which lists the names, positions and job descriptions of all of your employees.

RESPONSE:

27. Produce please produce any document which details and describes your organizational structure.

RESPONSE:

28. Any listing, concordance, of definition of any codes, response codes, shorthand, or abbreviations appearing in any of the preceding documents.

RESPONSE:

29. Any agreement under which any furnisher who reported information subject to reinvestigation by the plaintiff, reported, accessed, or furnished credit information to you.

RESPONSE:

30. Any schedule of consideration incentives under which any furnisher who reported information subject to reinvestigation by the plaintiff, reported or furnished credit information to you.

RESPONSE:

31. Any list generated by you – and specifically by any writing department within your organization - of manuals or guides produced or published by or within your organization.

RESPONSE:

32. Terminal audit trails as of the date of access of the plaintiff's consumer report by any of your subscribers who have received the plaintiff's consumer report since January 1, 2000.

RESPONSE:

33. Any budgets or projections prepared within the preceding five years, allocating resources or expenditures to the conducting of reinvestigation under 15 U.S.C. § 1681i.

RESPONSE:

34. Any programs under which any of your employees and/or other third parties are provided any bonus, pay, or other incentive relating to reinvestigations of consumer disputes.

RESPONSE:

35. Any manuals, bulletins or notices provided to furnishers of credit information, describing their contractual or statutory duties relating to the reinvestigation of inaccurate or incomplete credit information.

RESPONSE:

36. Please produce each and every archived report you maintain regarding plaintiff or any of his personal identifiers. This request *includes* the full set of scans available regarding any data file which you or any of your affiliates have caused to be merged into plaintiff's consumer credit reports or disclosures. If you will not produce them, then please produce a copy of all documents, invoices, contracts or receipts which prove and evidence the cost and expense of generating the scans as well as all contracts you have with whoever is to produce them.

RESPONSE:

37. Please produce any and all policy manuals, procedure manuals, or other documents, which are training manuals for your employees, in the following areas: consumer relations, disputes, reinvestigation, delete mechanisms, suppression functions, public records and deletion functions.

RESPONSE:

38. Please produce any and all of your documents discussing any of the following programs:

- a) Archival of consumer reports and other data maintained;
- b) On-line maintenance and storage of consumer reports accessed by subscribers and you;
- c) On-line maintenance, storage, archival process and microfiche process of consumer reports captured due to maintenance activity;
- d) Weighing of variables considered in assessing matches of files returned in the search process; and
- e) Generation and dissemination of summary profiles, derogatory data flags, credit scores and adverse action codes/denial codes.

RESPONSE:

39. Please produce your policy manuals, procedure manuals, or other documents, which address any of the following programs:

- a) any credit scoring models used by you;
- b) required input and match system used for generating consumer disclosures, as opposed to the input and match system provided for use by your subscribers;
- e) scorecard development programs used in your credit scoring models.

RESPONSE:

40. Please produce any and all documents which contain data listing or otherwise identifying each of your operators or other employees, their corresponding office descriptions and numbers, and their corresponding badge and identification numbers, who communicated with either or both Plaintiff, any person concerning any account, dispute, report, or other document(s) made subject of and/or requested in any of the foregoing requests by Plaintiff to you.

RESPONSE:

Respectfully submitted,
[CONSUMER],

By _____
Of Counsel