user\_fname user\_lname

user\_mailing\_address

user\_email

Attorney for Defendant

defendant\_fname defendant\_lname

SUPERIOR COURT OF THE STATE OF CASE\_STATE

FOR THE COUNTY OF CASE\_COUNTY

PLAINTIFF\_FNAME PLAINTIFF\_LNAME, ) CASE NO. case\_no

)

Plaintiff, ) **DEFENDANT'S REQUEST FOR**

**PRODUCTION OF DOCUMENTS**

)

v. )

)

DEFENDANT\_FNAME DEFENDANT\_LNAME, )

)

Defendants. )

)

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_)

**TO: plantiff\_fname plaintiff\_lname**

You are requested to file within **thirty (30) days** a written response to request on the (attached Document Schedule) and to produce those documents for inspection and copying.

1. Your written response shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to part of an item or category, that part shall be specified.
2. In accordance, the documents shall be produced as they are covered in the usual course of business or you shall organize and label them to correspond with the categories in the request.
3. These requests shall encompass all items within your possession, custody or control.
4. These requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.
5. If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous in the construction used, in responding.

**DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions:

1. The term "person" includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, state, which agencies or political subdivisions, and court, or any other governmental entity.
2. The terms "you" or "your" include the persons to whom these requests are addressed, and all that person's agents, representatives or attorneys.
3. In accordance, the terms, "document" or "documents" includes all writings, drawings, graphs, charts, photographs, recordings, and any other data computations from which information can be obtained, translated, if necessary by (you), through detection devices, into reasonably usable form.
4. The term "occurrence" means the incident complained out in the Plaintiff's complaint.

**DOCUMENTS TO BE PRODUCED**

1. All documents identified, directly or indirectly, in your answers to Interrogatories.
2. All written reports of all expert witnesses with whom you or your attorneys' have consulted, including, of course, those persons you expect to call as an expert witness at trial.
3. All documents upon which any expert witness you intend to call at trial relied to form an opinion.
4. The most recent resume or curriculum vitae of each expert whom you expect to call as an expert witness at trial.
5. All notes, correspondence, bills, invoices, diagrams, photographs, x-rays or other documents prepared or reviewed by each person whom you expect to call as an expert witness at trial.
6. All invoices generated by expert witnesses generated for performing all expert witness services to the defendant, including but not limited to, the fees for the medical examination, the records review, the pretrial preparation, any telephone conference, any trial testimony anticipated and any other fee paid by the defendants for expert fees.
7. All written, recorded, or signed statements of any party, including the Plaintiff, Defendant, witnesses, investigators, or agent, representative or employee of the parties concerning the subject matter of this action.
8. All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiff, or property damage.
9. Any documents which afforded liability insurance coverage for the incident which is the subject matter of the Plaintiff's Complaint.
10. Any documents identified in any other parties' Answers to Interrogatories.
11. Any documents received pursuant to a subpoena request in this case.
12. Any document prepared during the regular course of business as a result of the incident complained of in the Plaintiff's Complaint.
13. Copies of any treaties, standards in the industry, legal authority, rule, case, statute, or code, that will be relied upon in the defense of this case.
14. All maintenance records concerning the vehicle being driven by the Defendant on the date of the accident for the two (2) years prior to the auto accident.
15. Any and all invoices, logs, sales receipts, itineraries, or schedules for the Defendant.

It is requested that the aforesaid production be made within thirty (30) days of service of this request at the offices of Law Offices of user\_firm\_name, user\_mailing\_address.

Respectfully submitted,

USER\_FIRM\_NAME

/s/ user\_fname user\_lname

user\_fname user\_lname

Of attorneys for Defendant