

LEWIS F. POWELL, JR.  
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*Attorney for the Defendant*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

**RAPTURING,**  
*Plaintiff,*

**-against-**

**OLLIE FLETCHER,**  
*Defendant.*

Case No. **4:20-2220**  
Hon. Enforcement Beyond

**MOTION FOR DISCOVERY**

Pursuant to Rule 26 of the Federal Rules of Civil Procedure, the Defense, through undersigned counsel requests the plaintiff to produce the documents specified below, within one (1) day.

**INSTRUCTIONS AND DEFINITIONS**

(a) Whenever reference is made to a person, it includes any and all of such person's principals, employees, agents, attorneys, consultants and other representatives.

(b) When production of any document in the plaintiff's possession is requested, such request includes documents subject to the plaintiff's possession, custody or control. In the event that the plaintiff is able to provide only part of the document(s) called for in any particular Request for Production, provide all document(s) that the Plaintiff is able to provide and state the reason, if any, for the inability to provide the remainder.

(c) "Document(s)" means all materials within the full scope of Fed.R.Civ. P. 26.

(d) If any document is withheld from production under a claim of privilege or other exemption from discovery, state the title and nature of the document, and furnish a list signed by the attorney of record giving the following information with respect to each document withheld:

(i) the name and title of the author and/or sender and the name and title of the recipient;

(ii) the date of the document's origination;

(iii) the name of each person or persons (other than stenographic or clerical assistants) participating in the preparation of the document);

(iv) the name and position, if any, of each person to whom the contents of the documents have been communicated by copy, exhibition, reading or substantial summarization;

(v) a statement of the specific basis on which privilege is claimed and whether or

not the subject matter or the contents of the document is limited to legal advice or information provided for the purpose of securing legal advice; and

(vi) the identity and position, if any, of the person or persons supplying the attorney signing the list with the information requested in subparagraphs above.

(vii) investigative reports held during, before, or after were brought against the defendant. Any and all reports that show incriminating evidence or evidence that absolves the defendant.

(e) "Relate(s) to," "related to" or "relating to" means to refer to, reflect, concern, pertain to or in any manner be connected with the matter discussed.

### **DOCUMENT REQUESTS**

1. The Defense requests for the production by the plaintiff of all documents pertaining to Rule 26 and the above matters.
2. The torts brought against the defendant.

DATED: September 4th, 2020

Respectfully submitted,

/s/LewisFPowellJr

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