



2723 South State Street, Suite 150
Ann Arbor, MI 48104
(866) 534-6177
Law Company.com

[REDACTED]

[REDACTED], an individual
Plaintiff,

vs.

[REDACTED], and DOES 1-10,
inclusive,
Defendants.

Attorneys for Plaintiff [REDACTED]

CASE NO.: [REDACTED]

**PLAINTIFF'S FIRST SET OF
REQUESTS FOR PRODUCTION**

Judge: [REDACTED]
Assigned for All Purposes to
Department: [REDACTED]

Date Action Filed: [REDACTED]
Trial Date: [REDACTED]

SUPERIOR COURT FOR THE STATE OF CALIFORNIA

COUNTY OF [REDACTED] - CENTRAL JUSTICE CENTER

PROPOUNDING PARTY: [REDACTED]

RESPONDING PARTY: [REDACTED]

SET NO.: ONE

1 Pursuant to Code of Civil Procedure, Section 2031.010 through 2031.040, plaintiff, [REDACTED]
2 [REDACTED], requests that defendant [REDACTED] both identify and produce for inspection and
3 copying at [REDACTED], [REDACTED], Suite [REDACTED], [REDACTED], [REDACTED]
4 [REDACTED] the following specified items which are in her possession, or her attorneys' representatives or agents'
5 custody or control.

6 Pursuant to Code of Civil Procedure, Section 2031.210 through 2031.250, defendant is required
7 to submit a written response to this demand subscribed to under oath, both (1) identifying the requested
8 documents in defendant's possession, custody or control, and (2) stating that production, inspection and
9 copying thereof will be permitted as requested and/or objections to such production, inspection and
10 copying, with reasons for such objections, if any. SUCH WRITTEN RESPONSES ARE REQUIRED
11 TO BE SERVED WITHIN THIRTY (30) DAYS OF THE DATE OF THIS DEMAND.
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13 **DEFINITIONS**

14 For the purpose of this request, the following definitions shall apply:

- 15
- 16 1. The term "YOU" and "YOUR", as used herein, means and refer to Defendant/Responding Party
17 [REDACTED], acting by and through her agents, employees, insurers, agents, employees,
18 attorneys, accountants, investigators.
 - 19 2. The term "DEFENDANT" OR "RESPONDING PARTY" refers to Defendant/Responding
20 Party [REDACTED].
 - 21 3. The term "PLAINTIFF" OR "[REDACTED]" refers to Plaintiff/Propounding Party, [REDACTED]
22 [REDACTED].
 - 23 4. "INCIDENT" includes the circumstances and event surrounding the alleged [REDACTED]
24 or other occurrence giving rise to this action or proceedings.
 - 25 5. "DOCUMENT" shall mean any and all writings, papers, agreements, contracts, correspondence,
26 letters, telegrams, telex, memoranda, statements, studies, reports, publications, records, notes,
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1 messages, books, pamphlets, leaflets, microfilms, microfiches, computer indices, computer
2 printouts, records stored by means of computer or other technological means, photographs,
3 motion pictures, films, videotapes, video discs, audio recordings, whether on tape, disc, wire or
4 any other means of recording, drawings, surveys, or without limitation, any other kind of written,
5 typewritten, printed, or otherwise reproduced, including, but not limited to, any and all things
6 included within the definition of the term "writing" as the same is defined in Evidence Code,
7 Section 250, and including any other tangible or physical things from which information can be
8 obtained; each and every copy of custody or control or available or obtainable by you; each and
9 every copy of every such document where such copy contains any commentary or notation that
10 does not appear on the original. Please provide all original documents. PRODUCTION OF
11 COPIES BY MAIL WITH PROPER RESPONSE AND VERIFICATION SERVED SHALL BE
12 DEEMED SUFFICIENT COMPLIANCE WITH THIS DEMAND.
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14 Any and all documents as to which you claim a privilege or excuse as a ground or reason for non-
15 production shall be completely identified with the particularity required for a Subpoena Duces Tecum
16 including the date, author or sender, recipient or addressee, type of document, subject matter, and
17 identification of the present custodian of the document if it is not within your possession and the factual
18 and legal basis for the claimed privilege.
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20 **DOCUMENTS TO BE PRODUCED**

21 **REQUEST FOR PRODUCTION NO. 1:**

22 Any and all photographs, videotapes, DVDs, drawings and diagrams of the scene of the **INCIDENT**.
23 Xerox photographs of said photographs will not suffice. Color laser photographs or color photographs
24 should be submitted for which the **RESPONDING PARTY** shall be reimbursed for the reasonable
25 copying of same.
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27 **REQUEST FOR PRODUCTION NO. 2:**

1 Any and all photographs, videotapes or DVDs of any [REDACTED] involved in the **INCIDENT**.
2 Xerox photographs of said photographs will not suffice. Color laser photographs or color photographs
3 should be submitted for which the **RESPONDING PARTY** shall be reimbursed for the reasonable
4 copying of same.

5 **REQUEST FOR PRODUCTION NO. 3:**

6 Any and all **DOCUMENTS** which **YOU** have received in connection with this matter which mention
7 [REDACTED] name and were not received by **YOU** from [REDACTED] attorney.
8

9 **REQUEST FOR PRODUCTION NO. 4:**

10 Any and all **DOCUMENTS** submitted to or received from anyone concerning the subject matter of this
11 litigation.

12 **REQUEST FOR PRODUCTION NO. 5:**

13 Any and all **DOCUMENTS** which support any defenses **YOU** rely upon in **YOUR** defense to this
14 litigation.
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16 **REQUEST FOR PRODUCTION NO. 6:**

17 Any and all **DOCUMENTS** and other materials which support any contention that the subject
18 **INCIDENT** was the fault of anyone other than **YOU**.

19 **REQUEST FOR PRODUCTION NO. 7:**

20 Any and all **DOCUMENTS** in **YOUR** possession which would in any way challenge, diminish or refute
21 any of the [REDACTED]'s claimed injuries, medical and/or hospital bills, or lost earnings, loss of
22 educational opportunity, loss of earning capacity, and loss of enjoyment of life related to the subject
23 **INCIDENT**.
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25 **REQUEST FOR PRODUCTION NO. 8:**
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1 Any and all estimates, damage appraisals, repair bills, repair invoices or bills which reflect the cost of
2 repairs to the property of **DEFENDANT**, including but not limited to **DEFENDANT'S** vehicle damaged
3 as a result of the **INCIDENT**.

4 **REQUEST FOR PRODUCTION NO. 9:**

5 Any and all copies of repair estimates, damage appraisals, repair bills, repair invoices or bills which
6 reflect the cost of repairs for any other motor vehicle or object damaged as a result of the **INCIDENT**.

7 **REQUEST FOR PRODUCTION NO. 10:**

8 Any and all **DOCUMENTS** which **YOU** intend to rely on at trial.

9 **REQUEST FOR PRODUCTION NO. 11:**

10 Any and all expert reports whether or not intended for use at time of trial.

11 **REQUEST FOR PRODUCTION NO. 12:**

12 Any and all reports by law enforcement agencies, including but not limited to, [REDACTED] reports
13 and supplements thereto, police reports, DMV notification certificates, and police citations, regarding
14 the occurrence of this **INCIDENT**.

15 **REQUEST FOR PRODUCTION NO. 13:**

16 Any and all statements, in each and every form, including but not limited to all written statements, copies
17 of all original recordings or tapes of any statements, as well as transcriptions thereof, secured or obtained
18 in any way from **PLAINTIFF**.

19 **REQUEST FOR PRODUCTION NO. 14:**

20 Any and all statements, in each and every form, including but not limited to all written statements, copies
21 of all original recordings or tapes of any statements, as well as transcriptions thereof, of persons who
22 witnessed or claim to have witnessed the **INCIDENT**, and/or the events immediately prior to the
23 **INCIDENT**, and/or any events subsequent to the **INCIDENT** (i.e., while any party to the **INCIDENT**
24 was still at the scene thereof).

1 **REQUEST FOR PRODUCTION NO. 15:**

2 Any and all statements, in each and every form, including but not limited to all written statements, copies
3 of all original recordings or tapes of any statements, as well as transcriptions thereof, secured or obtained
4 in any way from **PLAINTIFF**.

5 **REQUEST FOR PRODUCTION NO. 16:**

6 The [REDACTED] registration or [REDACTED] title papers which relate to the ownership of the
7 [REDACTED] involved in the **INCIDENT** which was being driven by defendant [REDACTED].

8 **REQUEST FOR PRODUCTION NO. 17:**

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10 The Declarations page of the [REDACTED] policy in effect which insured the [REDACTED] defendant
11 [REDACTED] was driving at the time of the **INCIDENT** or, in the
12 alternative, documentation which establishes your financial responsibility as required by the State of
13 California at the time of the **INCIDENT** in lieu of required auto insurance.

14 **REQUEST FOR PRODUCTION NO. 18:**

15 Any and all receipts, canceled checks, charge slips, check stubs, including attachments to insurance
16 company checks, evidencing payment of any and all expenses and damages alleged to have been
17 sustained as a result of the **INCIDENT**.

18 **REQUEST FOR PRODUCTION NO. 19:**

19 A complete copy of all **DOCUMENTS** in **YOUR** possession obtained by subpoena.

20 **REQUEST FOR PRODUCTION NO. 20:**

21 Each and every **DOCUMENT** which is utilized by **YOU** in any way in responding [REDACTED]'s
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23 First Set of Special Interrogatories which was propounded upon **YOU** herewith.

24 **REQUEST FOR PRODUCTION NO. 21:**

25 A complete copy of all **DOCUMENTS** in **YOUR** possession obtained by a subpoena.

26 **REQUEST FOR PRODUCTION NO. 22:**

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If specially prepared interrogatory number 29 is in the affirmative, produce a copy of all
DOCUMENTS in **YOUR** possession related to **YOUR** response.

Dated: [REDACTED] [REDACTED]

By: _____
[REDACTED]
Attorneys for Plaintiff [REDACTED]

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF [REDACTED]

I am employed in the County of [REDACTED], State of California. I am over the age of 18 and not a party to the within action; my business address is [REDACTED], Suite [REDACTED], [REDACTED], [REDACTED]. On [REDACTED], I served the foregoing document described as PLAINTIFF'S RESPONSE TO FIRST SET OF REQUESTS FOR ADMISSION on the interested parties:

[REDACTED] S	Attorney for Defendant [REDACTED]
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BY MAIL: I caused such document(s) to be placed in a sealed envelope and delivered by U.S. Mail to the offices of the addressees on the attached Service List following ordinary business practices. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on the same day with postage thereon fully prepaid at [REDACTED], California in the ordinary course of business. I am aware that on motion of the party sewed, service is presumed invalid of postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

BY FACSIMILE: I caused such document(s) to be transmitted by facsimile to the offices of the addressees on the attached Service List following ordinary business practices.

BY PERSONAL SERVICE: I caused such document(s) to be personally served to the addressees on the attached Service List following ordinary business practices.

STATE: I declare under penalty of perjury under the laws of the State of California that the

1 foregoing is true and correct.

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3 Executed on [REDACTED], at [REDACTED], California.

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5 By: _____
6 [REDACTED]

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