

STATE OF [STATE]

IN THE _____ COURT FOR _____

[Plaintiff Name],

Plaintiff,

v.

[Defendant Name],

Defendant.

Case No. [Case Number]

Division: [Division]

**PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND
THINGS TO DEFENDANT**

Pursuant to the applicable rules of civil procedure of this jurisdiction, Plaintiff, [Plaintiff Name], by and through undersigned counsel, hereby requests that Defendant, [Defendant Name], produce the documents, electronically stored information (ESI), and tangible things designated below for inspection and copying.

I. DEFINITIONS AND INSTRUCTIONS

1. **"Document"** or **"Documents"** shall have the broadest possible meaning under the rules of civil procedure and includes, without limitation, any writing, drawing, graph, chart, photograph, sound recording, image, and other data or data compilations—stored in any medium from which information can be obtained—translated, if necessary, by the responding party into reasonably usable form.

2. **"Electronically Stored Information"** or **"ESI"** means any writings, drawings, graphs, charts, photographs, sound recordings, images, and other data or data compilations stored in any electronic medium. This includes, but is not limited to, emails, text messages, instant messages, voicemail messages, social media posts, metadata, database records, and files stored on hard drives, servers, cloud storage, or backup tapes.

3. **"You," "Your,"** or **"Defendant"** refers to the Defendant, [Defendant Name], and any of its agents, representatives, employees, attorneys, investigators, or other persons acting on its behalf.

4. **"Plaintiff"** refers to the Plaintiff, [Plaintiff Name].

5. **"Concerning," "relating to,"** or **"regarding"** means analyzing, containing, constituting, dealing with, defining, describing, discussing, embodying, reflecting, identifying, stating, summarizing, or in any way pertaining to the subject matter of the request.

6. **Time Period:** Unless otherwise specified in an individual request, the scope of these requests covers the period from _____ to the date of response.

1 **7. Manner of Production:** Documents and ESI shall be produced as they are kept in the usual
2 course of business or organized and labeled to correspond with the categories in this request.
3 ESI shall be produced in its native format or in a reasonably usable format with all metadata
4 intact.

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6 **8. Privilege Log:** If any document is withheld under a claim of privilege or work-product
7 protection, Defendant shall provide a privilege log containing: (a) the date of the document; (b)
8 the author; (c) the recipient(s); (d) the general subject matter; and (e) the specific legal basis for
9 withholding the document.

10 **II. REQUESTS FOR PRODUCTION**

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14 **REQUEST FOR PRODUCTION NO. 1:** All documents and communications concerning the
15 facts, occurrences, transactions, or incidents alleged in the Plaintiff's Complaint.

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17 **REQUEST FOR PRODUCTION NO. 2:** All documents, communications, or ESI between
18 Defendant and Plaintiff regarding the subject matter of this litigation.

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20 **REQUEST FOR PRODUCTION NO. 3:** All statements, whether written, recorded, or
21 signed, obtained from any party or witness concerning the claims or defenses in this action.

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23 **REQUEST FOR PRODUCTION NO. 4:** All photographs, video recordings, audio
24 recordings, diagrams, maps, or other visual or auditory representations of the incident, scene, or
25 property involved in this dispute.

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27 **REQUEST FOR PRODUCTION NO. 5:** All expert witness reports, curriculum vitae, and
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documents provided to or relied upon by any expert witness expected to testify on behalf of Defendant at trial.

REQUEST FOR PRODUCTION NO. 6: All business records, contracts, agreements, invoices, receipts, or financial documents relating to the transactions or relationship between Plaintiff and Defendant.

REQUEST FOR PRODUCTION NO. 7: All internal policies, procedures, manuals, guidelines, or training materials in effect at the time of the incident that relate to the subject matter of Plaintiff's claims.

REQUEST FOR PRODUCTION NO. 8: All documents, communications, or reports generated by any investigator, insurance adjuster, or agent concerning the claims asserted in this action.

REQUEST FOR PRODUCTION NO. 9: All documents and ESI that Defendant intends to introduce as exhibits at the trial of this matter.

REQUEST FOR PRODUCTION NO. 10: All documents, communications, or records that support, contradict, or otherwise relate to any affirmative defense asserted by Defendant in its Answer.

Dated: _____

Respectfully submitted,

Signature: _____

Printed Name: [Attorney Name]

Bar No.: [Bar Number]

Address: [Mailing Address]

Phone: [Phone Number]

Email: [Email Address]

Attorney for Plaintiff

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CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been served upon the following counsel of record on this _____, via the method indicated below:

Recipient: [Opposing Counsel Name]

Address: [Opposing Counsel Mailing Address]

Service Method: _____

Signature: _____

Printed Name: [Attorney Name]