



Sample Plaintiff's Request for Production of Documents and Things

In accordance with Federal Rules of Civil Procedure Rules 26 and 34, Plaintiffs, by counsel, hereby request Defendants to produce documents to [Counsel Name and Address], as specified below. Documents produced by Defendant must adhere with the Definitions set forth below and conditions of Rule 34 of the Federal Rules of Civil Procedure. Defendants have thirty (30) days of service to comply with the specified production, unless alternate mutually agreed upon terms are reached by all parties

The documents and things to be produced and any testing or sampling being sought are described as follows:

DEFINITION OF TERMS

“**COMPUTER DEVICES**” means any computer device, including any computer laptop or desktop, used by [Name] during his/her employment with [Company Name]

“**[Plaintiff]**” refers to and includes “[Full Company Name]” including, but not limited to, its parent and subsidiary companies, predecessors-in-interest, successors-in-interest, affiliated entities, members, agents, employees, servants, representatives, accountants, investigators, and attorneys.

“**[Defendant]**” means and includes “[Full Company Name]” and each person and/or entity acting on its behalf, including, but not limited to, its parent and subsidiary companies, predecessors-in-interest, successors-in-interest, affiliated entities, officers, directors, partners, associates, shareholders, agents, employees, servants, representatives, accountants, investigators, and attorneys.

“**DOCUMENT**” or “**DOCUMENTS**” mean each and every original or copy of words or information generated by printing, typing, longhand, electronic recording, or other process, regardless of the form thereof, and include any kind of “writing” as defined by California Evidence Code §250. Such documents include, but are not limited to, published materials, reports, correspondence, emails, records, memoranda, notices, notes, marginal notations, messages, teletype printouts, statements, books, studies, minutes, diagrams, drawings, maps, surveys, plans, charts, graphs, data, **computer files, computer tapes, computer diskettes, computer printouts, computer hard drives**, appointment books, telephone message tapes, telephone message slips, drafts, checks, money orders, invoices, billings, evaluations, photographs, audio tapes, and videotapes.

“**FILE**” and “**FILES**” means the complete file, folder, binder, or other filing system, and all documents contained therein as of the date of the deposition, and all documents not physically in the file, folder, binder, or other filing system that are normally kept within the file, folder, binder, or other filing system in the normal course of business.

DOCUMENTS TO BE PRODUCED

1. All DOCUMENTS relating to the services rendered by [Defendant] to [Plaintiff], beginning on or about [Date], with respect to the COMPUTER DEVICES.
2. A copy of all data that was stored, retrieved, downloaded, restored, reconstructed, removed, deleted, salvaged, regenerated and/or forensically extracted from the COMPUTER DEVICES or their storage media.
3. All DOCUMENTS relating to any communications between [Defendant] and [Plaintiff] with respect to the COMPUTER DEVICES.
4. All DOCUMENTS relating to any communications between [Defendant] and [Third Party] with respect to the COMPUTER DEVICES.
5. [Defendant’s] FILE with respect to the COMPUTER DEVICES.
6. [Defendant’s] FILE with respect to [Plaintiff].
7. DOCUMENTS relating to the methods, processes, utilities, and applications used by [Defendant] on the COMPUTER DEVICES.
8. DOCUMENTS relating to the qualifications of [Defendant] with respect to the services rendered on the COMPUTER DEVICES.
9. All DOCUMENTS pertaining to the COMPUTER DEVICES.
10. All floppy disks, CD-ROMS, hard drives, or any other storage media pertaining to the COMPUTER DEVICES.
11. All floppy disks, CD-ROMS, hard drives, or any other storage media pertaining to the master image of any drive generated from the COMPUTER DEVICES.
12. All DOCUMENTS relating to costs and fees billed to [Plaintiff] with respect to the COMPUTER DEVICES.
13. All DOCUMENTS relating to the terms of [Defendant’s] agreement(s) to provide services to [Plaintiff].
14. All DOCUMENTS relating to the hash of [Defendant’s] master drive image with respect to the COMPUTER DEVICES.

15. All DOCUMENTS relating to the original drive hash with respect to the COMPUTER DEVICES.
16. All DOCUMENTS relating to the chain of custody with respect to the COMPUTER DEVICES.
17. All DOCUMENTS relating to the storage of the COMPUTER DEVICES.
18. All DOCUMENTS relating to the forensic analysis of the COMPUTER DEVICES by [Defendant].
19. All DOCUMENTS relating to any conclusions derived from [Defendant's] forensic analysis of the COMPUTER DEVICES.
20. All DOCUMENTS relating to communications with [Plaintiff] regarding the conclusions derived by [Defendant] from the forensic analysis of the computer devices.