

_____ : _____ JUDICIAL DISTRICT COURT
: PARISH OF _____, LOUISIANA
_____ : DOCKET NO. _____

PLAINTIFF=S REQUEST FOR PRODUCTION

TO: _____, defendants by and through the attorney of record, _____,
_____, _____, Louisiana _____.

Plaintiff hereby requests pursuant to Article, 1461 of the Louisiana Code of Civil Procedure, that defendant produce the following documents and records.

- (1) Any and all photographs that defendant has of the scene of the accident or the resulting injuries to the Plaintiff.
- (2) Any and all expert reports which have been obtained from any expert and if a report has not been prepared, the preparation of a report is hereby requested.
- (3) Any and all insurance agreements or policies under which any person or entity carrying on an insurance business may be liable to satisfy part or all of a judgment which may be rendered in this action or to indemnify or reimburse for payments made to satisfy the judgment.
- (4) Copies of any and all statements previously made by plaintiff concerning the subject matter of this lawsuit, including any written statement signed or otherwise adopted or approved by the plaintiff hereto and any stenographic, mechanical, electrical or other type of recording or any transcription thereof made by plaintiff hereto and contemporaneously recorded.
- (5) Any and all drawings, maps or sketches of the scene of the accident which has been made the basis of this lawsuit.
- (6) A copy of any surveillance movies, photos, etc. of Plaintiff.
- (7) Copies of any and all accident reports prepared by employees of defendants or investigators employed by defendants.
- (8) Copies of any statements made by any employees of defendants concerning the accident in question.
- (9) A list of all employees employed by defendant at time of accident.

Plaintiff requests that defendant produce the above-mentioned documents and records at the office of Plaintiff=s attorney, _____, at _____, _____, Louisiana

_____, for inspection and copying at or before the close of business on or before the 15th day after this Request for Production is served on Defendant.

Respectfully Submitted,

Attorney for Plaintiff

_____, LA _____

(____)_____

La. Bar Roll No. _____
