

**IN THE CIRCUIT COURT OF                    COUNTY, MISSISSIPPI**

**PLAINTIFF**

**VS.**

**CAUSE NO.**

**DEFENDANTS**

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS**

THE following Request for Production of Documents is made to the Defendants pursuant to Rule 34 of the Mississippi Rules of Civil Procedure. Request is hereby made that Defendants produce and permit the inspection and copying of the following documents, at the offices of \_\_\_\_\_, \_\_\_\_\_, Mississippi \_\_\_\_\_, on \_\_\_\_\_, 20\_\_\_\_ at \_\_\_\_\_ : \_\_\_\_\_ a.m./p.m.

Request No. 1: Produce all contracts, deeds, and other documents in the possession of Defendants, individually, or as officers of \_\_\_\_\_ which relate to the purchase of the real estate and residence located on \_\_\_\_\_, Mississippi, which is the subject of this litigation.

Request No. 2: Produce all your individual and \_\_\_\_\_ records, including canceled checks, deposit slips and bank statements, commencing with the period of \_\_\_\_\_, \_\_\_\_\_ through the date of this request.

Request No. 3: Produce all contracts with contractors and/or subcontractors who have been engaged by you and/or \_\_\_\_\_ to perform any work on the site where the subject residence was located, including, without limitation, any agreements with any person to demolish the subject residence, and to purchase any materials which were part of the subject residence prior to or after demolition.

Request No. 4: Produce all plans and specifications for the construction of streets, drainage, and utilities to the property, which is the subject of this litigation.

Request No. 5: Produce all notes, memos, letters, correspondence, diaries, or other

documents, which may reflect the progress of work on the subject project from its beginning to the date of this request.

Request No. 6: Produce any and all documents of any kind or character which would show or indicate the cost of any delay which may, at any point, be the subject of a counterclaim.

RESPECTFULLY SUBMITTED, this the            day of            , 20            .

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Attorney for

Of counsel:

Telephone:  
MSB #  
Attorney for

#### CERTIFICATE OF SERVICE

This is to certify that I,            , attorney for Plaintiff,            , have forwarded this date a true and correct copy of the above and foregoing document, by U.S. Mail, postage fully prepaid, to            , Esquire,            ,            , Mississippi            , attorney for Defendants.

This the            day of            , 20            .

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