

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANTS

**DEFENDANTS RESPONSES AND OBJECTIONS TO PLAINTIFF'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, Defendants, and , by and through their attorney of record, in responding to Plaintiff's First Request for Production of Documents to Defendants, and states as follows:

REQUEST FOR PRODUCTION NO. 1: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of , d/b/a from through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 1: .

REQUEST FOR PRODUCTION NO. 2: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of from through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 2: .

REQUEST FOR PRODUCTION NO. 3: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of and/or for the period through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

REQUEST FOR PRODUCTION NO. 4: Books and records, including financial reports, inventories, equipment lists, insurance policies, invoices, and all other written documents pertaining to the business operations of , d/b/a and from through

RESPONSE TO REQUEST FOR PRODUCTION NO. 4:

REQUEST FOR PRODUCTION NO. 5: Certificates of title, bills of sale and all other written documents pertaining to equipment, vehicles, boats, and all other personal property of every kind and description owned by or belonging to \_\_\_\_\_ and/or \_\_\_\_\_ from \_\_\_\_\_ through \_\_\_\_\_.

RESPONSE TO REQUEST FOR PRODUCTION NO. 5:

REQUEST FOR PRODUCTION NO. 6: Certificates of title, bills of sale and all other written documents pertaining to equipment, vehicles, boats, and all other personal property of every kind and description owned by or belonging to \_\_\_\_\_ from \_\_\_\_\_ through \_\_\_\_\_.

RESPONSE TO REQUEST FOR PRODUCTION NO. 6:

REQUEST FOR PRODUCTION NO. 7: Deeds, promissory notes, contracts, agreements, and all other written documents pertaining to real property owned and/or possessed by \_\_\_\_\_ and/or \_\_\_\_\_ and \_\_\_\_\_ from \_\_\_\_\_ through \_\_\_\_\_.

RESPONSE TO REQUEST FOR PRODUCTION NO. 7:

REQUEST FOR PRODUCTION NO. 8: Bills of sale, certificates of title, contracts, agreements, letters, correspondence, memoranda, checks, and all other written documents pertaining to the sale or other disposition of real or personal property of every kind and description by \_\_\_\_\_ and/or \_\_\_\_\_ or \_\_\_\_\_ from \_\_\_\_\_ through \_\_\_\_\_.

RESPONSE TO REQUEST FOR PRODUCTION NO. 8:

THIS, the \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_,  
Respectfully submitted,

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Attorney for

Of Counsel:

Telephone:  
MSB #  
Attorney for

CERTIFICATE OF SERVICE

I, \_\_\_\_\_ do hereby certify that I have this day mailed by  United States first class mail, postage pre-paid,  hand,  facsimile a true and correct copy of the above and foregoing document to the Plaintiff's/Defendant's counsel of record:

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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