

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

**RESPONSES TO DEFENDANT'S FIRST REQUEST
FOR PRODUCTION TO PLAINTIFF**

Comes now , Plaintiff in the above styled and numbered cause, and files this his/her Responses to Defendant's First Request for Production to Plaintiff, and in support thereof would show unto the Court the following, to wit:

1. The federal and state income tax returns of plaintiff for , together with all schedules and attachments.

RESPONSE:

2. All documents pertaining to any examinations, treatment or testing of plaintiff's hearing or ears at any time. Defendant further requests plaintiff to execute the attached authorization so that defendant may obtain such information from time to time.

RESPONSE:

3. All documents related to plaintiff's military service. If these records are not available, defendant requests plaintiff to execute the attached authorization so that defendant may obtain these records.

RESPONSE:

4. All documents relating to medical treatment or examinations of plaintiff. Defendant further requests plaintiff to execute the attached authorization so that defendant may obtain such information from time to time.

RESPONSE:

5. All documents relating to testing of noise levels at any location where plaintiff worked for defendant.

RESPONSE:

6. All documents published by defendant, the American Association of Railroads or any other group with which defendant is or has been affiliated referring to noise exposure to railroad workers.

RESPONSE: .

7. All reports of expert witnesses employed by plaintiff or his/her attorney.

RESPONSE: .

8. All calculations, measurements, or test results of the hearing, or loss thereof, of plaintiff.

RESPONSE: .

9. All documents prepared by O.S.H.A. or any other agency or entity relating to noise levels at defendant's place of business.

RESPONSE: .

10. All documents relating to plaintiff's damages.

RESPONSE: .

11. All documents received by plaintiff from defendant relating to any aspect of his/her employment with defendant.

RESPONSE: .

12. All documents from any source warning or informing plaintiff of exposure to noise.

RESPONSE: .

13. All documents relating to the availability of ear protectors to plaintiff.

RESPONSE: .

14. All photographs of facilities or equipment available to plaintiff.

RESPONSE:

15. All photographs available to plaintiff.

RESPONSE: .

16. A recent photograph of plaintiff.

RESPONSE: .

17. All documents relating to defendant.

RESPONSE: .

18. All standards, regulations, guidelines or laws allegedly violated by defendant.

RESPONSE: .

19. All documents relating to noise exposure at any defendant's tools, time.

RESPONSE: .

20. All seniority rosters, personnel file materials, work schedules, safety or work rules, or other similar documents relating to your employment with defendant.

RESPONSE:

21. All documents relating to complaints made about noise levels at defendant's facilities.

RESPONSE: .

22. All written or recorded statements or memoranda of conversations of defendant's supervisory personnel.

RESPONSE: .

23. All written or recorded statements or memoranda of conversations of defendant's part on present employees.

RESPONSE: .

24. All written or recorded statements or memoranda of conversations pertaining to this suit.

RESPONSE: .

25. All documents relating to defendant's knowledge of problems posed by noise exposure.

RESPONSE: .

26. If any documents are being withheld because of a claimed privilege please identify each documents with sufficient specificity that the propriety of the claim of privilege can be evaluated.

RESPONSE: .

Respectfully submitted,

