

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

**PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS
AND THINGS PROPOUNDED TO DEFENDANT**

The Plaintiff, _____, propounds this his/her First Set of Requests for Production of Documents and Tangible Things, requesting that the documents and things requested herein be produced for inspection and copying at the law office of _____, Attorney, _____, _____, MS _____, and within _____ (_____) days of service hereof:

DEFINITIONS

The term "accident" as used herein means the occurrence described in the complaint.

REQUESTS

Request No. 1: All documents identified in or referred to in response to Plaintiff's First Set of Interrogatories to Defendant, segregated and identified by interrogatory number No. 1.

Request No. 2: All photographs of the accident scene, vehicles, and persons involved in the accident.

Request No. 3: Names and addresses of expert witnesses identified in response to interrogatory no. 2, together with 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.

Request No. 4: Curriculum vitae, or equivalent, of each expert identified in response to interrogatory no. 2.

Request No. 5: 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, including but not limited to any liability insurance policy covering defendant.

Request No. 6: Copies of any and all statements made by you regarding the accident made the subject of this suit.

Request No. 7: Identify all statements made by any and all witnesses to the accident.

Request No. 8: Identify all sketches made by you of the accident scene.

Request No. 9: A copy of the title to the automobile you were driving at the time of the accident.

Request No. 10: A copy of any damage appraisal made of the automobile you were driving at the time of the accident.

Request No. 11: A copy of your driver's license.

Respectfully submitted,

CERTIFICATE OF SERVICE

I, _____ do hereby certify that I have this day mailed a true and correct copy of the above and foregoing **PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS PROPOUNDED TO DEFENDANT** to the following counsel of record:
