

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

**PLAINTIFF**

**VS.**

**CIVIL ACTION NO.**

**DEFENDANT**

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS  
AND REQUEST FOR ADMISSIONS  
PROPOUNDED TO DEFENDANT**

COMES NOW the Plaintiff, \_\_\_\_\_, by and through counsel, and files this his/her Request for Production of Documents, pursuant to the Mississippi Rules of Civil Procedure, to allow the Plaintiff's counsel to inspect and copy the requested material at an agreeable time and place between counsel.

REQUEST NO. 1: Please produce any and all documents, papers, notes, memoranda, invoices, books, reports, and any other tangible item or thing which was used, referred to, identified, or is in any way relevant to the Defendant's responses and answers to the Plaintiff's First Set of Interrogatories.

REQUEST NO. 2: Produce for inspection and copying any and all documents and tangible things which are in any way relevant and discoverable pertaining to the Defendant's defense of this civil action.

REQUEST NO. 3: Produce for inspection and copying any and all diagrams, drawings, schematics, and plans of the automatic trunk closing device or electronic trunk lid pull down mechanism which is identified in the Plaintiff's Complaint.

REQUEST NO. 4: Produce any and all records of testing of the aforesaid automatic trunk closing device or electronic trunk lid pull down mechanism.

REQUEST NO. 5: Produce any and all documents and tangible things which the Defendant intends to introduce into evidence at a trial of this civil action.

**REQUEST FOR ADMISSIONS**

REQUEST NO. 1: Admit that the Plaintiff's automobile as described in the Complaint in this action was equipped with an automatic trunk closing device or electronic trunk lid pull down mechanism as described in the Plaintiff's Complaint.

REQUEST NO. 2: Admit that the Defendant manufactured said mechanism and installed the same into the Plaintiff's automobile which is described in the Plaintiff's Complaint.

REQUEST NO. 3: Admit that Exhibit "A" attached hereto is a true and correct copy of the automatic trunk pull down mechanism which appears on page \_\_\_\_\_, subsection \_\_\_\_\_ of the \_\_\_\_\_.

REQUEST NO. 4: Admit that there were no warnings placed at or near the trunk of the Plaintiff's automobile specifically warning and informing users of the automatic trunk lid pull down device.

REQUEST NO. 5: Admit that the automatic trunk lid pull down mechanism that was installed in the Plaintiff's automobile has no shut off feature designed into the device which could have prevented the Plaintiff's fingers from breaking.

Respectfully submitted,

BY: \_\_\_\_\_

Attorney for Plaintiff

**CERTIFICATE OF SERVICE**

I, \_\_\_\_\_, of counsel for Plaintiff, \_\_\_\_\_, do hereby certify that I have this day mailed, via United States Mail, postage prepaid, a true and correct copy of the above and foregoing Plaintiff's Request for Production of Documents and Request for Admissions Propounded to Defendant, \_\_\_\_\_ to:

THIS, the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_