

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS.

NO.

DEFENDANT

REQUEST FOR PRODUCTION

TO THE DEFENDANT,  
AND TO his/her ATTORNEY OF RECORD,  
HON.

Pursuant to Rule 34 of the Mississippi Rules of Civil Procedure, the Plaintiff hereby requests you to produce and permit the inspection and copying of the following documents within thirty (30) days after receipt thereof by your attorney at the office of counsel for Plaintiff located at .

The term "documents" includes, but is not limited to, all handwritten, typed, printed and photostated matter, and drafts, duplicates, carbon copies or any other copy thereof, in the possession, custody or control of the Defendant or the counsel for the Defendant including without limiting the generality of the definition all letters, correspondence, memoranda, notes, reports, statements, paraphrases of statements, drawings, tape recordings, graphs and charts, printouts and computations, work papers, studies, agreements, contracts, and records of telephone calls in the possession, control or custody of the Defendant or his/her attorney.

Please state whether or not any of the requested documents have been lost or destroyed, if you are unable to produce any of . All medical records, office notes, etc. prepared by you or in your possession concerning your former patient, .

Any medical malpractice insurance coverage policy in effect on the date you rendered services to Plaintiff, .

Copies of any hospital records regarding presently in your possession.

Any and all x-rays made of in your custody or under your control.

Respectfully submitted, on this the day of , 20 .

ATTORNEYS FOR THE PLAINTIFF

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BY:

CERTIFICATE OF SERVICE

This is to certify that I, \_\_\_\_\_, have this day forwarded a true and correct copy of the foregoing Request For Production to Hon. \_\_\_\_\_, Attorney at Law, by depositing same in the United States Mail postage prepaid, and mailing to \_\_\_\_\_ at \_\_\_\_\_ usual office address.

This the \_\_\_\_\_ day of \_\_\_\_\_, A. D., 20\_\_\_\_.

ATTORNEYS FOR THE PLAINTIFF

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BY: