Instruction: This is a model letter. Adapt to fit your facts and circumstances.

DATE

NAME
ADDRESS LINE 1
ADDRESS LINE 2
CITY, STATE ZIP CODE

Re: v. Cause No.

In the Circuit Court of County,

Dear :

As you requested, enclosed herewith please find a copy of the Defendant's Response to your First Request for Production of Documents in the above referenced matter.

After talking with my client, it appears that the only documents which my client has which are responsive to your Request for Production of Documents are the checks and check stubs forwarded to you by with his letter of . We do not know of any documents which would reflect that worked any hours other than those for which he was paid. If you have any such records, I believe that it would be helpful in resolving this matter if you would provide them to us. Absent any such records, we believe that the documents we have provided you clearly reflect that the amount due is \$ as previously tendered to you.

We remain willing to pay the \$ which we contend he is owed. If you believe he is owed some other amount, I would like for you to provide us with a detailed calculation of the amounts you allege to be due.

I look forward to hearing from you soon.

Sincerely,

By:

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