

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

_____)	
)	
)	
Petitioner/Plaintiff,)	
)	
Vs.)	NO. _____
)	
_____)	
Respondent/Defendant)	
)	

REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, the Plaintiff in the above-styled caused and requests that the defendants,
_____ Corporation d/b/a _____ and _____
Corporation to respond to said discovery within forty-five (45) days after said discovery is
served.

1. Produce all documents and tangible items identified by you in response to
interrogatory number _____.
2. Produce all documents and tangible items identified by you in response to
interrogatory number _____.
3. Produce all documents and tangible items identified by you in response to
interrogatory number _____.
4. Produce all documents and tangible items identified by you in response to
interrogatory number _____.
5. Produce all documents and tangible items identified by you in response to
interrogatory number _____.

6. Produce all photographs and/or video depictions you have concerning any matter pertaining to the incident made the basis of this suit.

7. Produce all documents and/or tangible items in your possession, your attorney's possession, your insurance carrier's possession or anyone acting on your behalf concerning the incident made the basis of this suit other than attorney-client privileged material.

8. Produce all accident reports, incidents reports, casualty reports or other such similar documents concerning the incident made the basis of this suit.

9. Produce all manuals, policies or procedures used by you in _____, _____, to prevent foreign objects from being present in your food products, which you serve to customers.

10. Produce all statements made by the plaintiff.

11. Produce all incidents reports, accident reports, casualty reports or other such similar documents within the past ten years wherein a person claimed to have suffered injuries as a result of a foreign object being in one of your food products.

12. Produce any statistical data, studies, investigations, evaluations, analyses, tests or other similar information concerning the number of people who have suffered or claimed to have suffered injuries, illnesses and/or who have died as a result of foreign objects in your food products.

13. Produce copies of any documents or literature you subscribe to discussing foreign objects in food products.

14. Produce all warnings and/or instructions disseminated by you concerning foreign objects in food products.

15. Produce all photographs or video depictions of the plaintiff.

16. Produce all documents concerning the “_____” hamburger plaintiff consumed.

Respectfully submitted,

Dated: _____

Name: _____

Title:

Address:

Address:

City, State, Zip:

Phone:

Fax:

E-Mail:

Attorney No.:

CERTIFICATE OF SERVICE

I, _____, do hereby certify that I have this day mailed,
U.S. Mail, postage prepaid, a true and correct copy of the above and foregoing to
_____, at the following address;

THIS the ____ day of _____, 20____.

PLEASE SERVE REQUEST FOR PRODUCTION OF DOCUMENTS WITH THE COMPLAINT.