

IN THE _____ COURT OF _____ COUNTY
STATE OF _____

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

REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, the plaintiffs in the above-styled cause pursuant to the _____ Rules of Civil Procedure and propounds the following discovery requests. In responding to this request for production of documents, you are required to furnish all documents available to you, including documents in the possession of your attorney, your insurance carrier or any person acting on your behalf, and not merely such documents that may be in your personal possession. If you cannot respond to any particular request in full exercising due diligence to secure the documents sought, so state and respond to the extent possible, specifying your inability to respond to the remainder.

You are under a duty to seasonably amend a prior response if you obtain information upon the basis of which you know that the response, though correct when made, is no longer true, and the circumstances are such that a failure to amend the response is, in substance, a knowing concealment.

1. Produce a copy of the front and backside of your driver's license.
2. Produce a copy of all statements made by any plaintiff.

3. Produce all photographs and/or video depiction, of plaintiff's vehicle, your vehicle, any vehicle involved in the accident, and the scene of the accident (including any and all tangible objects), from whatever source concerning the accident made the basis of this suit.

4. Produce all documents and tangible items identified by you in response to interrogatory ____.

5. Produce all documents and tangible items pertaining to any repair, alteration or change to your vehicle, including all estimates, from the time you came into possession of the vehicle up to the present.

6. Produce a copy of any accident report, incident report or casualty report concerning the accident made the basis of this suit.

7. Produce a copy of the automobile insurance policy in effect on the vehicle you were driving on the date of the accident made the basis of this suit, including the declaration page.

8. Produce a copy of the registration and title to the vehicle you were driving.

9. Produce all schematics, prints or drawings concerning the scene of the accident made the basis of this suit.

10. Produce all documents and tangible items concerning any aspect whatsoever of the incident made the basis of this suit obtained from any source, in your possession, your attorneys' possession or your insurance carrier's possession, and, for anything not produced based upon any alleged privilege, identify the privilege, the date of the document, who it was sent to, who it was from, the purpose of the communication and any other matter relevant to the asserted privilege.

11. Produce all documents generated by, seen by, and/or considered by your expert(s).

12. Produce all documents generated by you, sent to your attention, or seen by you concerning the accident made the basis of this suit other than attorney-client privileged material.

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 REQUESTS FOR PRODUCTION WITH THE COMPLAINT.