

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 and requests that the defendant, _____ Childcare, Inc., d/b/a _____ Daycare respond to these requests within _____ (____) days after said discovery is served upon you.

1. Produce all documents and tangible items identified by you in response to interrogatory number 1(d).
2. Produce all documents and tangible items identified by you in response to interrogatory number 4(b).
3. Produce all documents and tangible items identified by you in response to interrogatory number 5.
4. Produce all documents and tangible items identified by you in response to interrogatory number 8(c).
5. Produce all documents and tangible items identified by you in response to interrogatory number 9(e).

6. Produce all photographs and/or video depictions you have concerning any matter pertaining to plaintiffs and/or 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, incident 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 connection with the rendition of daycare services to children in your care, custody and/or control.

10. Produce all statements made by any plaintiff.

11. Produce all incident reports, accident reports, casualty reports or other such similar documents within the last 10 years where a person has claimed to have suffered injuries while in your care, custody and/or control.

12. Produce any statistical data, studies, investigations, evaluations, analysis, tests or other similar information concerning injuries sustained by children in a daycare setting.

13. Produce copies of any document and/or literature you subscribe to concerning the prevention of injuries to children in a daycare setting.

14. Produce all drawings, photographs, schematics, blueprints or other similar depictions concerning the room or rooms at your facility which _____ would have been in on the ____ day of _____, 20____.

15. Produce all documents reflecting the schedules of your agents, servants and/or employees charged with rendering daycare services to _____ on the ____ day of _____, 20____.

16. Produce any logs, memos, internal memos, correspondence, communications or any computer generated data concerning any injuries sustained by any children in your care, custody and/or control within the past _____ (____) years.

17. Produce any logs, memos, internal memos, correspondence, communications or any computer-generated data concerning any injuries sustained by _____.

18. Produce all documents and tangible items concerning the hiring, training, supervision, retention, and disciplining of your agents, servants, or employees in effect during January, _____.

19. Produce the personnel files of the persons charged with or who otherwise rendered daycare services to _____ during January, 20____, including Ms. _____.

20. Produce all documents and tangible items concerning the operation, staffing, control and maintenance of your facility in effect during January, 20____.

21. Produce all documents showing all payments made by plaintiffs for day care services you rendered _____.

22. Produce all documents showing your enrollment and/or the number of children at your daycare facility during January, 20____.

23. Produce all contracts with plaintiffs.

24. Produce all documents showing the number and/or names of people rendering day care services to children at your facility during January, 20____.

25. Produce all documents and tangible items concerning all citations or other disciplinary actions taken against you with respect to the rendition of day care services.

26. Produce all documents and tangible items given to your agents, servants, and/or employees concerning the rendition of day care services which would have been in effect during January 20____.

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 WITH COMPLAINT