

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFFS/ COUNTERDEFENDANTS

VS. CAUSE NO.

DEFENDANT/ COUNTERCLAIMANT

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

THE following Requests for Production of Documents is made to the Defendant pursuant to Rule 34 of the Mississippi Rules of Civil Procedure. Request is hereby made that Defendant produce and permit the inspection of copying of the following documents at the offices of on at a.m/p.m

REQUEST NO. 1: Produce all files maintained by you in relation to the construction of the residence of Plaintiffs on Lot , Mississippi.

REQUEST NO. 2: Produce all invoices, statements, delivery tickets, contracts or other written documents pertaining to the purchase of materials by Defendant, or others, which were used in the construction of the subject residence. Also, provide all evidence of payment of said expenses, including, but not limited to, payment of said expenses, including, but not limited to, canceled checks.

REQUEST NO. 3: Produce all contracts, subcontracts or other written instruments regarding any subcontractors engaged by Defendant or Plaintiffs in the construction of the subject residence.

REQUEST NO. 4: Produce all written documents regarding labor used in the construction of the subject residence, including time records, payroll records, payroll checks and such other documents as may reflect the payment of labor to employees of Defendant.

REQUEST NO. 5: Produce all insurance policies wherein Defendant is the named insured, including, but not limited to, worker's compensation, contractor's liability, builder's risk, homeowner's, and automobile. Include in your production, all policies of insurance maintained during the period commencing through the date of this request.

REQUEST NO. 6: Produce all plans and specifications used by Defendant in construction of the subject residence.

REQUEST NO. 7: Produce all notes, memos, letters, correspondence, diaries, or other documents which may reflect the progress of work on the subject residence from its beginning to the date of this request.

REQUEST NO. 8: Produce all invoices submitted by Defendant to Plaintiffs from the date construction commenced to the date of this request.

Respectfully submitted, this the day of , 20 .

BY: _____

ATTORNEY FOR PLAINTIFFS/
COUNTERDEFENDANTS

CERTIFICATE OF SERVICE

I, _____ do hereby certify that I have this day mailed by U. S. Mail, postage prepaid, a true and correct copy of the above and foregoing *Plaintiffs' First Request for Production of Documents* to _____, the attorney for _____.

This the _____ day of _____, _____.
