

EXAMPLE OF A REQUEST FOR DOCUMENTS

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All photographs, records, films, charts, sketches, graphs and diagrams of the area involved in the accident or occurrence, the locale surrounding the area of the accident or occurrence, or any other matter or thing involved in the accident or occurrence taken/and or prepared.
2. All statements, memoranda or writings (signed and unsigned) of any an all witnesses including any and all statements, memoranda, or writings of plaintiff and/or defendants and/or all persons involved in the accident or occurrence. The statements referred to herein are defined by [State Rule of Civil Procedure XXXX].
3. All transcripts and summaries of all interviews conducted by anyone on behalf of defendants of any potential witness or person who has any knowledge of the accident or its surrounding circumstances.
4. All interoffice memoranda between representatives of defendants or memoranda to defendants' file concerning the manner in which the accident occurred.
5. All interoffice memoranda between representatives of the defendants or memoranda to defendants' file concerning the injuries sustained.
6. A copy of any written accident report concerning the accident or occurrence signed by or prepared by the defendants.
7. Any and all copies of reports, correspondence, memoranda and writings rendered by any expert witness employed or consulted by defendants and/or anyone acting on defendants' behalf concerning this case.
8. The entire claims and investigation file or files of the defendants, defendants' counsel, or any other organization, excluding references to mental impressions, conclusions or opinions representing the value or merit of the claim or defense or respecting strategy or tactics and privileged communication from counsel.
9. All property damage estimates rendered for any object belonging to defendants that was involved in the accident or occurrence.
10. Any and all documents containing the name and home and business addresses of all individuals contacted as potential witnesses.
11. Any and all press releases in the possession of defendants' counsel.