

1 [YOUR NAME]
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3 Telephone: [YOUR PHONE NUMBER]
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6 STATE OF ARIZONA
7 MARICOPA COUNTY SUPERIOR COURT

8 _____, a [single/married
9 man/woman],

10 Plaintiff,

11 v.

12 [Name of Defendant] and Jane Doe [last
13 name of defendant], husband and wife;
14 JOHN DOES 1-5; JANE DOES 1-5;
15 BLACK CORPORATIONS 1-5; and
16 WHITE PARTNERSHIPS 1-5,

17 Defendants.

Case No. CV _____

18 **PLAINTIFF'S RESPONSE TO
19 DEFENDANT'S REQUEST FOR
20 PRODUCTION**

(Assigned to the Honorable
[name of the judge])

21 TO: Defendants and their attorney of record

22 Pursuant to Rule 26.2(B) and 34, *Ariz.R.Civ.P.*, Plaintiffs hereby respond to Defendant's
23 Request for Production of Documents as follows:

24 **RESPONSE TO REQUEST FOR PRODUCTION**

25 1. Executed and signed State and Federal Income Tax Returns, with all
26 schedules and attachments filed for the tax year the Complaint was filed and the previous
27 four tax years. **See attached.**

28 2. Any written or recorded statement or interviews or testimony from any
witness or party concerning any issue in this litigation or the accident in question. If you

1 are claiming that such statements or documents are privileged or work product, please list
2 the names and addresses of any person(s) from whom you have a statement or
3 document, the date such statement was taken, the person who took such statement or
4 document and the Custodian of such statement or document. **N/A**

5
6 3. Any note(s), correspondence, report(s), paper(s) authorized by any
7 consultant, expert, engineer, or investigator that pertains to the alleged negligence of
8 Defendant, the alleged injuries to Plaintiff, or the alleged economic losses suffered or to be
9 suffered by Plaintiff. If you are claiming that such note(s), report(s), or paper(s) are
10 privileged or work product, please list the names and addresses of such agents,
11 consultants, etc., the date such documents were prepared and the custodian of such
12 documents. **Discovery is ongoing and this will be supplemented.**

13
14 4. Copies of all documents identified in Plaintiff's answers to Uniform and/or
15 Non-Uniform Interrogatories and Rule 26.1 Disclosure Statement. **See attached. See**
16 **Disclosure Statement for documents referenced therein.**

17
18 5. Copies of all writings you authored, including letters, emails, test messages,
19 or any entry to social media, websites, blogs, personal diaries, calendars, appointment
20 books, or similar documents bearing any references to: (a) the accident/incident in
21 question, (b) your claimed injuries, damages, or medical treatments, or (c) recreational
22 activities you physically engaged in since accident in question (including, but not limited to,
23 vacations, trips, and sporting events), and for the three years prior to the accident. **See**
24 **attached. As to documentation as to recreational activities three years prior to the**
25 **accident, Plaintiff objects on grounds of relevance.**

