

Plaintiff, v. et al., Defendants.	* * * * * * * * *	IN THE CIRCUIT COURT OF MARYLAND FOR PRINCE GEORGE'S COUNTY  Case #
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**REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendant, \_\_\_\_\_ by and through her attorney, pursuant to the Maryland Rules of Civil Procedure, requests that the Plaintiff produce the following documents.

**INSTRUCTIONS**

You must file a response to these Requests within thirty (30) days after service of them or provide within such time period the reason for your refusal to produce any document or part thereof requested. If you withhold a document on the basis of an assertion of privilege, you shall identify the date of the document, its author, subject matter, each recipient (whether indicated on the document or not), and the privilege asserted.

The documents shall be produced at The Law Offices of \_\_\_\_\_

\_\_\_\_\_, to allow for inspection and copying thereof. They shall be produced in the files and order as they are kept in the ordinary course of business or in an order that organizes and labels them so as to correspond to each request made.

If any document responsive to any request was, but no longer is, in your possession, custody, or control, please identify each such document and indicate the manner and circumstances under which it left your possession, custody, or control, and its whereabouts, if known.

These Requests are continuing in nature and require that you supplement your response and production throughout the pendency of this action.

### DEFINITIONS

The terms "you" or "your" refer to the person to whom this Request is addressed and that person's representatives, agents, subrogees, employees, subsidiaries, affiliates, officers, directors, and, unless privileged, attorneys.

The term "person" includes a natural person, a corporation, partnership, other business entity or association, and any government or governmental body, commission, board, or agency.

The term "occurrence" unless otherwise indicated, refers to the time, place, and circumstances of the event to which reference is made in the complaint herein filed.

The terms "document" or "documents" include every tangible thing from which information can be obtained, perceived, reproduced, or communicated, either directly or with the aid of a machine or device, including, but not limited to, any written, typed, printed, punched, filmed, marked, recorded, or graphic matter, correspondence, and memoranda (internal or otherwise), drawings, graphs or charts, tapes or wires, films, photographs, movies, disks, drums, cassettes, computer data, punched data, or other data computations, however, stored,

produced or reproduced, and all copies of transcriptions of any of the foregoing by whatever means made.

### DOCUMENTS REQUESTED

1. Any and all statements, either written or recorded, made by the party propounding this Request, or by the party's agent, servant, or employee, in any way related to the occurrence or to this action.
2. All documents containing oral, written, or otherwise recorded statements relating to the occurrence, including documents containing any such statements made by you or any current or former representative, agent, subrogee, or attorney of yours.
3. All documents and/or photographs identified in your Answers to Interrogatories.
4. All documents and materials given, furnished, or provided by you or on your behalf to any expert witness you expect to call at trial.
5. All written reports of each person who you expect to call as an expert witness at trial.
6. The most recent resume or curriculum vitae of each expert who you expect to call as an expert witness at trial.
7. Copies of all bills and invoices with respect to any of the damages complained of in this action.
8. All documents and written reports prepared by you, and/or on your behalf, in the ordinary course of business concerning the occurrence.

9. All documents and written reports concerning any investigation conducted by you, and/or on your behalf, in connection with the occurrence.
10. All photographs, plats, or diagrams of the scene and/or objects connected with the occurrence.
11. All medical records, hospital records, physician notes, drawings, charts, graphs, photographs, x-rays, dental records, or other documents concerning any and all injuries allegedly incurred by you as a result of the occurrence.
12. All medical reports, hospital records, physician notes, charts, graphs, photographs, x-rays, medical records, or other documents concerning any and all injuries, illnesses, sickness, disease, or disability which you have incurred at any time within ten (10) years prior to the occurrence and up to the present date.
13. Any and all federal and state tax returns filed by you in the past five (5) years, including, but not limited to, all statements, schedules, and attachments, as well as estimated tax returns.
14. Any and all statements or other documents to and/or from your employer or employers concerning any time claimed to have been lost from your work as a result of the occurrence.
15. All photographs, videotapes, audiotapes, x-rays, diagrams, surveys, or other graphic representations of information concerning the subject matter of this action.

16. All documents not heretofore requested or produced that relate or refer to the occurrence or your injury or liability therefore, including personal notes or memoranda, referring to the occurrence and its consequences.

17. All documents regarding any communications between you and any of the Defendants in this matter.

18. All documents upon which you base your contention that the Defendants were liable as alleged in the Complaint.

19. All documents evidencing any settlement or agreement not to sue in the referenced matter.

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Attorney for Defendant