

**IN THE SUPERIOR COURT OF _____ COUNTY
STATE OF GEORGIA**

))
_____,)
Plaintiff,)
v.)
_____) Civil Action File No. _____
Defendant)
)
)
)

**REQUEST FOR PRODUCTION OF DOCUMENTS AND
NOTICE TO PRODUCE**

TO: _____

NOW COMES _____, Plaintiff or
 Defendant herein, and files this, his/her Request for Production of Documents pursuant
to the provisions of O.C.G.A. § 9-11-34 . You are requested to produce the documents set
forth below for inspection and copying by counsel for the Plaintiff at the following
location: _____

Pursuant to the provisions of O.C.G.A. § 24-10-26, you are also served with this Notice
to Produce. In accord with O.C.G.A. § 24-10-26 , you are required to produce the
following documents at the time of the taking of any deposition, upon the hearing of any
interlocutory matter, motion, hearing on contempt, and upon any trial of this cause.

The documents and records which you are notified and requested to produce are as
follows:

1.

All pay-stubs, statements of earnings, W-2 forms, 1099 forms, K-1 forms, and any other
documents given to you by your employer and/or any other person, partnership,
corporation, or other entity showing your income from any source from January 1,
_____, to the date of trial of the above-styled case.

2.

All records of bank checking accounts, savings accounts, and investment and money
market accounts maintained by you, individually and/or jointly with others, or maintained
by you as trustee or custodian for any other person or persons, including but not limited

to monthly bank statements, cancelled checks, deposit slips, check registers, passbooks, statements relating to savings accounts, certificates of deposit, and any other such records from January 1, _____, to the date of trial of the above-styled case.

3.

All records and other tangible evidence relating to any profitsharing plans, pension plans, Keogh plans, Individual Retirement Accounts, stock ownership plans, 401-K plans, and any other deferred compensation or retirement plans of any nature in which you have any interest, whether or not any such plans qualified pursuant to the INTERNAL REVENUE CODE of 1986, as amended, for the period from January 1, _____, to the present, including but not limited to the following:

- (a) Any quarterly, semi-annual, and annual statements of your interest and account as a participant in any such plan;
- (b) Any forms in the Form 5500 Series (Annual Return/Report of Employee Benefit Plan) filed by the trustee or administrator of such plan with the Internal Revenue Service for the last _____ years;
- (c) Any Summary Plan Description or similar document containing the terms and conditions under which the plan is maintained;
- (d) Any statements showing the assets held in, or purchased or sold by, each of the plans in which you have an interest or account and the value of these assets as of the most recent valuation date; and,
- (e) Any documents reflecting the present beneficiaries of your interest in any and all such plans.

4.

- (a) All warranty deeds, quitclaim deeds, and deeds to secure debt which name you as grantee or grantor, individually and/or jointly with any other person or persons, relating to real property in which you have any interest or equity.
- (b) All closing statements, contracts of sale, or other documents relating to your purchase or sale of any interest in real property in the last five (5) years.
- (c) Any and all real estate leases or lease/purchase agreements showing you as lessor or lessee.
- (d) Any real estate option agreements of which you are a party.

5.

(a) All automobile tag registration certificates and automobile title certificates naming you or your spouse, individually and/or jointly with any other person or persons, as owner.

(b) Any notices or other documents relating to any insurance coverage for said automobiles.

(c) Any automobile leases or lease/purchase agreements of which you are a lessor or lessee.

6.

(a) All stock certificates, bond certificates, mutual funds certificates, and any other evidence of ownership of any interest in any corporation, mutual fund, or money market fund naming you, individually and/or jointly with any other person or persons, as an owner.

(b) All monthly, quarterly, annual, or other statements and check registers, if any, relating to your interest in any securities and any investment accounts of any nature whatsoever for the period from January 1, _____, to the present.

7.

Please produce all receipts, sales or purchase notices, or other documents reflecting your purchase or sale of any interest in any tangible personal property of any nature, including but not limited to any gold, silver, stereo and video equipment, furniture, appliances, cameras, boats, televisions, jewels, furs, automobiles, or any other such asset (cost exceeding \$ 999) of any nature for the last _____ months.

8.

All contents of any safe deposit boxes maintained by you, individually and/or jointly with any other person or persons, as of the date of service of this Notice to Produce and Request for Documents. In lieu of the actual contents, you may choose to produce a true and complete list of the contents.

9.

Any and all tangible evidence, including but not limited to statements of account, deeds, notes, trust agreements, contracts, agreements, letters, memoranda, notices, or other documents, relating to any interest you may have in any property, tangible or intangible, which interest in property has not been produced by you pursuant to any other paragraph in this Notice to Produce and Request for Documents. Such property interests include, but are not limited to, interests in any of the following:

- (a) Any trust or estate, including but not limited to present, future, and reversionary interests;
- (b) Any notes or accounts receivable;
- (c) Any partnerships, joint ventures, or syndicates;
- (d) Any negotiable or non-negotiable instruments;
- (e) Any U.S. Treasury Bills or Notes;
- (f) Any royalties, copyrights, or patents;
- (g) Any oil, gas, or mineral interests; and
- (h) Any other assets or interest in property of any nature not otherwise covered in this Notice to Produce and Request for Documents.

10.

All copies of personal financial and net worth statements submitted by you, individually and/or jointly with any other person or persons, to any bank or lending institution for the period from January 1, _____, to the date of trial of the above-styled case.

11.

All documents and letters received by you from January 1, _____, to the date of trial of the above-styled case from any real estate broker, appraiser, or agent, as well as from any attorney, accountant, bank officer, stockbroker, appraiser, or any other person, concerning the status or value of any present or future interest you have in any corporation, partnership, sole proprietorship, security, trust, estate, reversionary interest, partnership, joint venture, syndicate, jewelry, furniture, art, or in any other real or personal property.

12.

For the period from January 1, _____, to the present, produce all life insurance policies and certificates on your life, as well as all premium notices, forms, and other correspondence between any insurance company or agent and you relating to any life insurance of which you are the owner and/or the insured person.

13.

All medical and/or dental insurance policies and booklets insuring you, individually and/or jointly with any other person or persons, as well as all premium notices and correspondence received by you in the last year in connection with same.

14.

(a) Any and all income tax returns filed by you, individually and/ or jointly with any other person or persons, with the Federal and State governments for the last _____ years.

(b) All W-4 forms which you have submitted to your employer since your date of original employment; if none, produce a statement from your employer indicating the number of withholding exemptions which you are declaring for federal income tax purposes.

(c) All declarations of estimated tax filed by you with the Federal and State taxing authorities for the following tax years: _____.

15.

Any and all documents, receipts, or vouchers reflecting the funds provided to you, directly or indirectly, for reimbursement or otherwise by your employer as an expense account or reimbursed expenses for the period from January 1, _____, to the present.

16.

Any and all intangible tax returns filed by you, individually and/or jointly with any other person or persons, with any State government for the period from January 1, _____, to the present.

17.

Any and all notes, installment obligations, lines of credit, home equity loans, and other obligations of any nature whatsoever of which you are currently an obligor, individually and/or jointly with any other person or persons. If there are monthly statements or check registers relating to any loan account, please produce these records for the period from January 1, _____, to the present.

18.

Any and all notes or obligations of any nature whatsoever of which you are currently an obligee, individually and/or jointly with any other person or persons.

19.

Any and all notes, installment obligations, or other obligations with a principal amount of \$ 1,000 or more (excluding charge account or credit cards) of which you were an obligor, individually and/or jointly with any other person or persons, on January 1, _____, or any time thereafter, but of which you are no longer an obligor or joint obligor.

20.

Copies of any notes, installment obligations, or other obligations of any nature of which you are now a guarantor, co-guarantor, or have been a guarantor or co-guarantor during the last year.

21.

Any and all monthly credit and charge statements and receipts showing all charges and payments made and the balance due on any credit cards or charge accounts maintained by you or regularly used by you, including, but not limited to, any accounts maintained in your name, the name of your spouse, the names of your spouse and yourself together, or in the name of your employer or any other person or entity, for the period from January 1, _____, to the present.

22.

Any and all employment contracts between you and your present employer, as well as any incentive stock option plans or other agreements arising from or relating to your employment, for the time from when you first became employed to the present.

23.

All partnership tax returns and corporate tax returns filed with the Federal and State governments for any partnership, corporation, or association of which you are a partner or a stockholder with more than a ten percent (10%) interest for the period from January 1, _____, to the present.

24.

Any and all monthly, quarterly, or annual cash flow summaries, profit and loss statements, or income statements of any nature for any partnership, corporation, or association of which you are a partner or a stockholder with more than a ten percent (10%) interest for the period from January 1, _____, to the present.

25.

Any and all balance sheets or statements of assets and liabilities for any partnership, corporation, or association of which you are a partner or a stockholder with more than a ten percent (10%) interest for the period from January 1, _____, to the present.

26.

Any partnership agreements, stockholder agreements, buy-sell agreements, or other agreements of any nature relating to any partnership, corporation, or other business entity in which you have an interest.

27.

Any and all checking and savings account records, and records of any money market accounts or other investment accounts, maintained in connection with any partnership, corporation, or association of which you are a partner or a stockholder with more than a ten percent (10%) interest, including but not limited to the entity known as _____, for the period from January 1, _____, to the present.

28.

Any and all minute books of any corporation in which you have more than a ten percent (10%) interest.

29.

Any resumes, employment application forms, letters, notices, or other papers relating to any effort on your part to investigate employment opportunities for yourself.

30.

Any and all detective reports, investigative reports, and related letters, invoices, photographs, film, tape recordings, voice recordings, and other tangible evidence and information of any nature relating to or arising from any surveillance or investigation of the activities or affairs of the [Plaintiff or Defendant] in this case, which surveillance or investigation was performed on your behalf in connection with this action.

31.

Any and all tangible evidence of any nature which is in the possession or control of you or your attorney, or which is being held for you by any person or entity for safe-keeping, which evidence relates in any manner to the conduct of the [Plaintiff or Defendant] in this action, including, but not limited to, notes, cards, letters, photographs, film, documents, tapes, voice recordings, clothes, or other such tangible evidence.

