

KINSEY
LAW
OFFICES



REQUEST FOR PRODUCTION OF TANGIBLE THINGS

Sample Only
Use At Your Own Risk



DEMANDING PARTY: _____

RESPONDING PARTY: _____

SET NUMBER: _____

To _____ [responding party], _____ [name], and _____ [his or her
or its] attorney:

_____ [Demanding party], _____ [name], demands that
_____ [responding party] produce for inspection and _____ [specify other
related activities, such as: photographing] the following tangible things or categories of
tangible things in _____ [responding party's] possession, custody, or control. The
items described must be produced on _____ [date at least 30 days after service
of demand], at _____ [time], at _____ [specify reasonable location],
located at _____ [address], _____ [city], _____ County, California.
Pursuant to section 2031(h) of the Code of Civil Procedure, _____ [responding
party] is required to serve a written response to this inspection demand with _____ [20
or as the case may be] days from the date of service of this demand.

1. _____ [List and number each tangible thing or category of tangible
things separately, describing each in enough detail to allow responding party to easily
identify items demanded, for instance:

- a. The 1986 _____ (brand name and model number) motorcycle on
which defendant was riding at the time of the accident that is the subject

of this suit.

- b. The motorcycle helmet that defendant was wearing at the time of the accident that is the subject of this suit.]

2. _____ [Specify manner in which activities other than inspection will be performed, for example: The items produced by _____ (responding party) will be subjected to inspection, photographing, testing, and sampling as follows:

- a. Photographing of the motorcycle and helmet.
- b. Sampling of any blood, dirt, or other foreign matter found on the motorcycle or helmet.
- c. Microscopic examination of any blood, direct, or other foreign matter found on the motorcycle or helmet.
- d. Photographing of any findings from the microscopic examination of the motorcycle and helmet.]

3. _____ [If testing, sampling, or other related activities will permanently alter or destroy items involved, that fact must be included, for example: The items produced by _____ (responding party) will be permanently _____ (altered or destroyed) in that _____ (describe manner and extent of alteration or destruction). However, _____ (demanding party) will provide _____ (responding party) with copies of any photographs of _____ (altered or destroyed) items prior to any _____ (alteration or destruction).]

Date: _____
_____ [Plaintiff's name]
Plaintiff *In Pro Per*

Gene Kinsey
Kinsey Law Offices
1198 Pacific Coast Hwy., Suite 353
Seal Beach, CA 90740

Phone: (562) 596-8177
Email: KinseyE@ix.netcom.com
Web: www.kinseylaw.com
www.realpropertypartition.com