

RESPONSE TO REQUEST FOR PRODUCTION

Sample Only
Use At Your Own Risk



PROPOUNDING PARTY: _____

RESPONDING PARTY: _____

SET NUMBER: _____

INTRODUCTORY STATEMENT

Responding party, _____, makes the following response to _____'s Request for production and inspection:

These responses are made only for the purpose of the within action. Each response or answer is subject to all objections as to competence, relevance, materiality, propriety, admissibility and any other objections and grounds that would require the exclusion of any statement herein if any document was asked for, or if any statement contained therein were made by a witness present and testifying in court, all of which objections and grounds are reserved and may be interposed at the time of trial.

This responding party is responding to all Demand categories to the extent that information has become known by this responding party. However, this responding party's discovery, investigation and preparation for trial of this matter has not been completed as of the date of these responses, and therefore, this responding party does not purport to state anything more than information presently known and discovered by this responding party.

This responding party, in responding to this Demand, reserves the right to continue discovery and investigation in this matter for facts, witnesses and support data that may recall information, which if presently known, would be included in these responses. For example, to the extent that any Demand calls for the identification of "all documents", it is responded to fully insofar as information is presently available to this responding party and this responding party is not precluded from presenting at trial information discovered after the

date of the response to this Demand.

This preliminary statement is incorporated into each of the responses set forth below.

INSTRUCTIONS:

- 1. CUT AND PASTE THE TEMPLATE BELOW AS NEEDED TO RESPOND TO EACH REQUEST FOR PRODUCTION.**
- 2. CHOOSE YOUR RESPONSE AND DELETE INAPPLICABLE RESPONSES.**
- 3. WHERE DOCUMENTS ARE PRODUCED, COPY THEM AND USE THE EXHIBIT DIVIDER FORM WE ARE SENDING YOU HERewith TO ORGANIZE THEM AND DELIVER THEM TO OUR OFFICE AFTER YOU HAVE COMPLETED YOUR RESPONSES.**
- 4. IF YOU HAVE QUESTIONS, CONTACT OUR OFFICE TO SET UP A PHONE CONFERENCE TO DISCUSS THEM.**
- 5. WHEN YOU HAVE COMPLETED YOUR ANSWERS, E-MAIL THEM BACK TO US. WE WILL PREPARE THE FINAL COPY FOR YOUR SIGNATURE.**

TEMPLATE

RESPONSE TO DEMAND <>:

Responding Party hereby produces the documents requested

[OR]

Responding Party is unable to produce the requested item(s) because the items requested never existed.

[OR]

Responding Party is unable to produce the requested item(s) because they have been destroyed.

[OR]

Responding Party is unable to produce the requested item(s) because they have been lost, misplaced, or stolen. Responding Party has made a diligent search, but has been unable to locate these documents at this time. Responding Party will provide copies of them

to defendant if and when they are located.

[OR]

Responding Party is unable to produce the requested item(s) because they have never been in Responding Party's possession, custody, or control.

[OR]

Responding Party is unable to produce the requested item(s) because they are no longer in Responding Party's possession, custody, or control. The name and address of the person in possession of the requested item(s) is:

RESPONSES

Date: _____

_____ [Plaintiff's name]

Plaintiff *In Pro Per*

VERIFICATION

I, ____, am a ____ in the above-entitled action. I have read the foregoing *RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS AND PRODUCTION OF DOCUMENTS* and know the contents thereof. The same is true of my own knowledge, except as to those matters which are therein alleged on information and belief, and as to those matters, I believe it to be true.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed at Seal Beach, California.

DATED: _____

_____ [Name]

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