

Print out, then collect the information

## **Request for Production of Documents**

**Instructions:** These items that you may have to make available are called “Request for Production of Documents”. Please review this document and gather the requested information. You may receive a Request for Production that is very similar to the items below, hence I am requesting that you gather them now rather than forced to latter on. The Items are:

1. Any and all documents, receipts or vouchers reflecting the funds provided to you directly or indirectly, for reimbursement or otherwise by your employer or by a business or corporation in which you have any interest, as an expense account or reimbursement expense, together with copies of expense account and/or reimbursement reports submitted by you and/or on your behalf, from the date of the marriage through the trial of this matter.
2. Any and all pay stubs or other documents showing your income from any source since the date of through the trial of this matter.
3. All employment information, including without limitation, child care reimbursement plan, wages, salaries, bonuses, stock options, commissions, earning, income employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind, credit union accounts, pension plan, pension fund, retirement plan, retirement fund, stock plan and stock fund and other benefits or deductions of any kind which are, were previously, or which, may be in the future paid, available, accepted, rejected, credited, offered, withheld for any purpose by any individual agency, department, company, entity, or otherwise, or to which you are, were or may become entitled in the future, at any time from the date of the marriage through the trial of this matter.
4. Any and all records of all checking and/or savings accounts, including credit union accounts, certificates of deposit, 401(k) accounts and IRA's maintained by you, individually and/or jointly with any other or others, or any other accounts over which you have had signature authority in any other capacity (regardless of whether or not

the account or accounts have been closed), including, but not limited to, monthly bank statements, checkbooks, cancelled checks, check registers, deposit slips, check requests, passbooks, statements relating to savings accounts or certificates of savings deposit and any other records from the date of the marriage through the trial of this matter.

5. Any and all monthly statements, receipts and records of all debit card, credit card and/or charge account held, used or maintained by you individually and/or jointly with any other or others, or any other accounts you were or are authorized to charge purchases to the accounts of another person or entity (regardless of whether or not the account or accounts have been closed), from the date of the marriage through the trial of this matter.
6. Any and all stock certificates, bond certificates, mutual funds certificates, and any other evidence of ownership or of any interest in any securities, investments, mutual funds, liquid asset funds, corporation, fund or trust fund naming you individually and/or jointly with any other or others, as the owner of the same from the date of the marriage through the trial of this matter.
7. Any and all bills for rental for any and all safe deposit boxes maintained by you individually and/or jointly with any other or others from the date of the marriage through the trial of this matter. Please produce or list any and all contents of all safe deposit boxes maintained by you, individually or joint with others as of the date of service of this Notice to Produce and Request for Production of Documents from the date of the marriage through the trial of this matter.
8. Any and all long distance and cellular telephone records listed in your name, individually and/or jointly with any other or others, from the date of the marriage through the trial of this matter.
9. Any and all evidence of property and/or interest in property of every kind and character whatsoever owned by you individually and/or jointly with any other or others, including any reversionary interests, and including, but not limited to, accounts receivable, notes, corporate agreements, partnership agreements, tax deferred annuities, profit-sharing statements, pension plan statements and savings account passbooks from the date of the marriage through the trial of this matter.

10. Any and all warranty deeds, quitclaim deeds and deeds to secure debt which name you as grantee or grantor, individually and/or jointly with any other or others, or in your name in trust or in your name as guardian for any other person, relating to any property in which you have or have had any interest or equity from the date of your divorce from Defendant to the date of trial of the above- styled case. Also produce all closing statements, sales agreements and options, or other documents relating to your purchase or sale of any interest in real property since the date of the marriage through the trial of this matter, including any leases or mortgages related thereto (including monthly payments and present outstanding balance of principal and interest) together with any evidence showing all contributions in cash or otherwise made by you to the acquisition of such real estate.
11. Any and all documents, memoranda, closing statements or writings relating to any interest you had or may have in real estate, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partner, limited partner, shareholder, joint venturer, mortgagee, developer, manager or otherwise; and copies of all real estate mortgages held by you, or by any entity (including but not otherwise; and copies of all real estate mortgages held by you, or by any entity (including but not limited to realty trusts, partnerships or corporations) in which you have or had a present or contingent interest from the date of the marriage through the trial of this matter.
12. Any and all automobile tag registration certificates and automobile title certificates naming you, individually and/or jointly with any other, as owner. Also, please provide the name, address and telephone number of the owner and/or person in possession of any motor vehicles that you currently have access to drive (excluding rental cars) and give the make, model and year of all such vehicles.
13. Copies of any and all diaries, journals, personal notes kept by you, calendars and/or daytimers you keep for the period from the date of the marriage through the trial of this matter.
14. Any and all copies of any business or personal financial and/or net worth statements, prepared by an accountant or any other person for you or for any business in which you have or had an interest from the date of through the trial of this matter, together with any credit applications, loan applications and other financial

information submitted by you to any bank, credit card company or lending institution, or that you have prepared or had for your own use, since the date of the marriage through the trial of this matter.

15. Complete copies of all state and federal income tax returns filed by you individually and/or jointly with any others from the date of the marriage through the trial of this matter, including all accompanying schedules, any attachments to such returns and all worksheets used in preparing same, requests for any tax extensions, and all 1099, K-1 (IRS Form 1065) and W-2 forms received for the same period.
16. All life insurance policies and certificates on your life as well as all premium notices, beneficiary designation forms and other records and documents received or compiled by you in connection with any life insurance of which you are the owner and/or the insured person since the date of the marriage through the trial of this matter. If you have changed the beneficiary of any of your life insurance in the last two (2) years, produce all forms reflecting these changes.
17. Any and all homeowner's, automobile, medical, dental and disability insurance policies insuring you individually or jointly with others, including all schedules attached hereto as well as all premium notices received by you since the date of the marriage through the trial of this matter.
18. 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 having a value in excess of \$250.00, including but not limited to any gold, silver, stereo and video equipment, furniture, appliances, cameras, computers, boats, televisions, jewels, furs, clothing, automobiles, animals or any other such asset of any nature for the last two (2) years.
19. Copies of any resumes, employment application forms, letters, notices or other papers relating to any effort on your part to investigate employment opportunities for yourself in the last two (2) years.
20. Please produce a current estimated monthly budget of your personal expenses, including, but not limited to, food, clothing, shelter, housing, transportation, entertainment and miscellaneous expenses. You may use the budget form known as

"Affidavit for Use in Connection with Support Orders" as set forth in Uniform Rule 24.2.

21. A list of the names and addresses of any and all proposed expert witnesses and copies of all written reports rendered to you or your attorney by any such proposed expert witness.
22. Copies of all criminal warnings, warrants, indictments and/or accusations issued against you by any legal authority since the date of the marriage through the trial of this matter
23. All intangible tax returns file by you, individually and/or jointly with others, with any State of municipal government for the date of the marriage through the trial of this matter..
24. Any and all savings books, bank books, savings certificates or documentary evidencing ownership of money by You or in the name of You or in the name of another and You the date of the marriage through the trial of this matter.
25. Any and all personal financial statements and/or net worth statements submitted to any bank, lending institution, individual or any other entity by You the date of the marriage through the trial of this matter..
26. Any promissory notes, stock option agreements, or other instruments evidencing any financial obligation due You now or in the future.
27. All promissory notes or other documents evidencing any financial obligation or indebtedness of You.
28. Any profit sharing plan, pension plan, deferred benefit plan or retirement plan or You a summary plan description, last annual report of the plan (IRS Form 5500) and any other documents provided by the plan administrator or employer describing or projecting benefits.
29. All documents and/or letters received by you from three (3) years prior to the filing of the above-styled action to the date of trial from any real estate agent, accountant, bank officer, stock broker, or any other person or entity, notifying you of the value of your interest in any corporation, trust, reversionary interest, or in any real or personal property or any other asset.
30. All contents of all safe deposit boxes maintained by You, individually and/or jointly with others, as of the date of service of this Request for Production of Documents.

31. Any document or other instrument creating a testamentary trust, inter vivos trust or other trust in which You is a beneficiary or receives or is to receive some financial distribution now or in the future.
32. Any and all tangible evidence of any nature including telephone records, detective reports, photographs, video tape recordings or voice recordings which relate in any manner to the conduct of your spouse during the marriage which you contend provides the basis for (1) grounds for divorce, (2) determination of equitable division of property, (3) the denial or award of alimony or (4) determination of custody.