

IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VERSUS

CIVIL ACTION NO.

DEFENDANT

**DEFENDANT'S RESPONSE TO FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

COMES NOW , Defendant, by and through counsel, and files this his/her Response to the Plaintiff's First Request for Production of Documents, and for such Response would show unto the Court the following, to-wit:

REQUEST NO. 1: All of his/her state and federal income tax returns for the years

ANSWER: All state and federal income tax returns are in the office of , and are open for inspection by the attorney for the Plaintiff at times suitable and agreeable with counsel for both Plaintiff and Defendant.

REQUEST NO. 2: Copies of all financial statements prepared by or for him/her at any time during the past five years.

ANSWER: None.

REQUEST NO. 3: All records regarding his/her checking and savings accounts, whether solely in his/her own name or in his/her name jointly with someone else, or held for him/her in the name of someone else, in any and all banks and other financial institutions during the past five years, including but not (records and documents showing any and all transfers by him/her of any and all such property since the date of the marriage of the parties.

ANSWER: See answer to No. 1 and see answer to interrogatories.

REQUEST NO. 5: All records and documents showing ownership by him/her of stocks, bonds, commodity contracts, promissory notes, certificates of deposit, ready asset accounts, cash funds, and any and all other chooses in action, whether owned by him/her alone or with someone else, or held for him/her in the name of someone else, together with all records and documents showing the purchase and transfer by him/her of any and all such property since the date of the marriage of the parties.


ANSWER: See answer to No. 1 and answers to interrogatories.

REQUEST NO. 6: All life insurance policies on his/her life, together with all records showing the cash value of such life insurance policies.

ANSWER: See answer to No. 1 and answer to interrogatories.

Sample Responses To Requests For Production Of Documents

Henry H. Perritt



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Paralegal Litigation Marcy Fawcett-Delesandri, 2000-12-01 A handbook for paralegals this book contains the forms pleadings and instructions needed to successfully handle most types of litigation Fawcett Delesandri herself a paralegal provides model interrogatories demand letters sample motions checklists and practice tips as well as information on meeting with clients and witnesses preparing exh

The Divorce Trial Manual Lynne Z. Gold-Bikin, Stephen Kolodny, 2003 This concise guide is a complete roadmap through a divorce trail from the initial interview to trial preparation to the closing argument

Discovery in Federal and State Courts in Illinois, 2003

Trademark Trial and Appeal Board Manual of Procedure (TBMP). United States. Trademark Trial and Appeal Board, 2003

Construction Disputes Thomas J. Kelleher, Brian G. Corgan, William E. Dorris, 2002-01-01 All areas of construction litigation are covered in this two volume set starting with case analysis pretrial activities and special forum issues The authors continue with an in depth discussion of the difficult presentation issues for delay and acceleration claims lost productivity claims and establishing damages The final section of the text covers trial and other issues including direct and cross examination appeals and settlement and releases Practical examples of and checklists for the drafting of many of the key documents used in construction litigation are also included

Americans with Disabilities Act Handbook Henry H. Perritt, 1997 Disks contain sample complaints motions orders affidavits interrogatories requests and other forms from the printed text in WordPerfect format

California Continuing Education of the Bar Action Guide, 1991

Title List of Documents Made Publicly Available, **Decisions** United States. Federal Mine Safety and Health Review Commission, 1992-05

Fundamentals of California Litigation for Paralegals Marlene A. Maerowitz, Thomas A. Mauet, 2007-06-22 The new edition of Maerowitz and Mauet s Fundamentals of California Litigation for Paralegals gives students a complete explanation of California specific litigation Clearly written with the student in mind the text makes the material accessible while the accompanying workbook and forms put theory into practice These features make this text an appealing choice offers a complete understanding of the litigation process from the time the client walks into the office through trial and post judgment including settlements and alternative forms of resolutions balanced approach neither oversimplifies the litigation process nor clouds the educational course with excessive information pedagogical aids such as bold faced terms defined in the glossary examples charts and checklists sample documents chapter overviews and summaries and review questions are featured throughout the text tailored to the California rules with each chapter referencing the specific California statute where more information can be found and California forms included throughout provides opportunities for the instructor to pick and choose which areas to emphasize a workbook on CD accompanies the text and includes five case scenarios based on California law along with associated Judicial Council forms to be used as practical exercises Instructor s Manual provides answers to the questions posed in the workbook and book as well as a test bank of questions that include true false short answer and essay

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