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 Response To Request For Production Of Documents**

**Mark Steyvers** 

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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 Discovery in Federal and State Courts in Illinois, 2003 California Continuing Education of the Bar Action Guide ,1991 Americans with Disabilities Act Handbook Henry H. Perritt, 2002-11-01 The Americans With Disabilities Act Handbook provides comprehensive coverage of the ADA s employment commercial facilities and public accommodations provisions as well as coverage of the transportation communication and federal local and state government requirements In one comprehensive two volume set you ll get a complete analysis of the Act and all the forms and case law you ll need to prepare your case Recognized ADA authority Henry H Perritt Ir clearly defines statutory and regulatory requirements for public and private employers commercial facilities and places of public accommodation There's a complete analysis of the rapidly expanding case law organized by frequently litigated topics like wheelchair access and AIDS discrimination In depth analysis is provided for the numerous federal and state cases and significant regulatory activity by the EEOC cropping up each year You ll also get thorough analysis of how the Rehabilitation Act of 1973 relates to ADA The statutory definition of disability and the concept of being and quot otherwise qualified and quot for a job are also discussed in depth And you ll see exactly what employers business owners and providers of governmental services must do to make andquot reasonable accommodation andquot Plus a comprehensive section that organizes case law by type of physical and mental impairment and accommodation by type of job requirement making analysis easier Americans With Disabilities Act Handbook has been updated to include Analysis of a Supreme Court case finding that Wal Mart class action did not meet requirements of Federal Rules of Civil Procedure 23 Case law applying the 2008 Amendments and EEOC s implementing regulations Analysis of Supreme Court case providing a framework for and quot cat's pawand quot proof of disparate treatment Analysis of a Supreme Court case finding retaliation because of a fiance and e s protected activity Analysis of a Supreme Court case allowing oral requests for FMLA leave Analysis of cases assessing whether the employer erroneously perceived an employee as unable to perform a andquot range of jobsandquot Discussion of a case denying safe harbor to a recovering drug abuser Analysis of case allowing an employer to assign an HIV positive employee to train only those employees signing a waiver Discussion of a case finding that a return to work medical examination did not violate the ADA Analysis of the andquot one strikeandquot rule imposed by an employers association Discussion of a case finding that reductions in paratransit services did not violate ADA New cases rejecting challenges to arbitration **Decisions** United States. Federal Mine Safety and Health Review Commission, 1992 **Effectively** Representing Your Client Before the "new" IRS Jerome Borison, 2000 A project of the American Bar Association Section

of Taxation Low Income Taxpayer Committee The Commercial Litigator's Job Cristen Sikes Rose, 2005 The Commercial Litigator's Job A Survival Guide provides helpful tips and instruction on the assignments that litigators are likely to receive in the commercial litigation department of most law firms This book is not a summary of the law but rather a recipe book for turning out legal work that satisfies the palates of the senior lawyers who give you your work and write your Nolo's Deposition Handbook Paul Bergman, Albert Moore, 2025-06-01 Take the fear and mystery out of your deposition Nolo's Deposition Handbook is a must read for anyone taking defending or facing a deposition You'll find all the information and instructions you need whether or not a lawyer is representing you Packed with concrete suggestions and examples this book explains how to arrange a convenient date prepare for the deposition and respond to questions with confidence Best of all you ll learn the three golden rules for answering questions and the trick questions lawyers often use to influence testimony Written in plain English Nolo's Deposition Handbook is an excellent resource for eyewitnesses expert witnesses parties to a lawsuit people who represent themselves in court lawyers law students and legal assistants and anyone participating in a deposition conducted online The 9th edition is updated to include information on electronic discovery and the latest statutes court cases and federal rules and provides information on how to set up and conduct a deposition remotely using a computer <u>Legal Nurse Consulting Patricia W. Iyer, MSN, RN, LNCC, 2002-11-26</u> Designed to meet the needs of both novice and advanced practitioners the first edition of Legal Nurse Consulting Principles and Practice established standards and defined the core curriculum of legal nurse consulting It also guided the development of the certification examination administered by the American Legal Nurse Consultant Certification Board The extensive revisions and additions in Legal Nurse Consulting Principles and Practices Second Edition make this bestselling reference even more indispensable The most significant change is the inclusion of 15 new chapters each of which highlights an important aspect of legal nurse consulting practice Entry into the Specialty Certification Nursing Theory Applications to Legal Nurse Consulting Elements of Triage for Medical Malpractice Evaluating Nursing Home Cases Principles of Evaluating Personal Injury Cases Common Mechanisms of Injury in Personal Injury Cases ERISA and HMO Litigation The LNC as Case Manager Report Preparation Locating and Working with Expert Witnesses The Role of the LNC in Preparation of Technical Demonstrative Evidence Marketing Growing a Business Business Ethics Legal Nurse Consulting Principles and Practices Second Edition presents up to date practical information on consulting in a variety of practice environments and legal areas Whether you are an in house LNC or you work independently this book is your definitive guide to legal nurse consulting

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Register, Enhanced by IntraWEB, LLC, 2014-01-01 The Code of Federal Regulations Title 16 contains the codified Federal laws and regulations that are in effect as of the date of the publication pertaining to commercial practices of U S goods and services as relate to the Federal Trade Commission and the Consumer Product Safety Commission including Fair Credit Reporting warranties anti trust product safety and general trade regulations The Code of Federal Regulations of the United States of America, 1973 The Code of federal regulations is the codification of the general and permanent rules published in the Federal register by the executive departments and agencies of the federal government Code of Federal **Regulations** United States. Department of Agriculture, 2008 Special edition of the Federal register containing a codification of documents of general applicability and future effect as of with ancillaries Title 29 Labor Part 1927 to End (Revised as of July 1, 2013) Office of The Federal Register, Enhanced by IntraWEB, LLC, 2014-07-01 The Code of Federal Regulations Title 29 contains the codified Federal laws and regulations that are in effect as of the date of the publication pertaining to labor including employment wages and mediation Title List of Documents Made Publicly Available, **Code of Federal** Regulations, Title 16, Commercial Practices, PT. 1000-End, Revised as of January 1, 2012, 2012-04-16 2018 CFR e-Book Title 16 Commercial Practices Part 1000 to End Office of The Federal Register, 2018-01-01 Title 16 Commercial Practices Part 1000 to End Federal Register, 2012-10

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