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

Paul Bergman,Albert Moore

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