

IN THE CHANCERY COURT OF                      COUNTY, MISSISSIPPI

PLAINTIFF

VS.

CIVIL ACTION NO.

DEFENDANTS

**DEFENDANTS RESPONSES AND OBJECTIONS TO PLAINTIFF'S  
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, Defendants,                      and                      , by and through their attorney of record, in responding to Plaintiff's First Request for Production of Documents to Defendants, and states as follows:

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RESPONSE TO REQUEST FOR PRODUCTION NO. 1:                      .

REQUEST FOR PRODUCTION NO. 2:      Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of                      from                      through                      .

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:                      .

REQUEST FOR PRODUCTION NO. 3:      Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of                      and/or                      for the period                      through                      .

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

REQUEST FOR PRODUCTION NO. 4:      Books and records, including financial reports, inventories, equipment lists, insurance policies, invoices, and all other written documents pertaining to the business operations of                      , d/b/a                      and                      from                      through                      .

# Sample Objections To Request For Production Of Documents

**David Baud**



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