V I R G I N I A

 IN THE CIRCUIT COURT OF

 \*

Plaintiff \*

 \*

vs \* Case No. \_\_\_\_\_\_\_\_\_\_

 \*

 \*

 \*

Defendant \*

 FIRST REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS

To:

Pursuant to the Rules of the Court, the undersigned hereby requests the production for inspection and copying of the following documents and/or things, to be produced at the law offices of the undersigned in compliance with the Rules of the Court.

 DEFINITIONS AND INSTRUCTIONS

A. As used herein, the word "document" and its cognates refer to all writings or other tangible or electronic records including, but not limited to, all copies of any written, printed or typed material, photostatic copies, photographic, and recorded matters of any kind or character, correspondence, notes, memoranda, studies, research, reports, test results, proposals, advertising brochures, memoranda, newspaper or magazine articles, press/news releases, drawings, labels, warnings, brochures, instructions, literature, package inserts, or any other type of writing or record that pertains in any way to the documents sought below.

B. As used herein, the word "document" includes all copies unless such copies (including notations and marks thereon) are exact duplicates of documents that are produced.

C. The term "defendant", as used herein, shall mean each and every defendant named in this cause of action and their respective employees, agents and representatives.

D. All documents produced should be numbered consecutively in the lower right-hand corner. Each paragraph of your response should state which numbered documents are being produced in response to that paragraph.

E. The guidelines for the Interrogatories sent with this Request for Documents are incorporated herein.

 DOCUMENTS AND THINGS TO BE PRODUCED

1. The recorded or transcribed statements of persons whose identity is called for in the Interrogatories propounded by this party and any such statement of the party propounding this discovery request.

2. The reports, letters or other documents prepared by any expert witness you expect to call at the trial of this matter.

3. The most recent curriculum vitae of any expert witness you expect to call as a witness at the trial of this matter.

4. The documents referring or relating to any criminal convictions of any parties to this action or persons that may be called as witnesses at trial.

5. The pictures, diagrams, drawings, images, videos or mockups, which you contend contain information relating to the facts of this case.

6. The documents referred to or identified by you in answering the Interrogatories served along with this Request for Documents and Things.

7. The documents or things received by you in response to any Subpoena issued by you.

8. The documents that contain any facts as to damages/injuries suffered/incurred by you as a result of the incident.

9. The documents and things containing facts that the Plaintiff has not suffered/ incurred the damages/injuries alleged herein.

10. The social media postings made by you or on your behalf referring or relating to the incident or your physical or mental condition after the incident.

11. The documents containing facts and/or opinions relied upon by any expert witness you expect to call at the trial/hearing of this matter. Statements made by Counsel containing opinions or impressions of Counsel may be excised.

12. The documents and things setting forth the terms of the contract at issue in this case.

13. The documents and things containing any facts that there has been a breach of contract by any party to this action.

14. The documents that set forth the damages claimed in this action.

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*Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

***CERTIFICATE OF SERVICE***

I hereby certify that a true copy of the foregoing was sent this \_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_ by: \_\_\_\_\_\_\_\_ regular mail, postage pre-paid

\_\_\_\_\_\_\_\_ facsimile

\_\_\_\_\_\_\_\_ electronic mail

\_\_\_\_\_\_\_\_ hand delivery

To:

 *Counsel for \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_*

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 Brien A. Roche, Esq.