V I R G I N I A

 IN THE COURT OF

\*

Plaintiff \*

\*

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

\*

\*

Defendant \*

 ***AFFIDAVIT FOR PRODUCTION OF WRITINGS***

COMES NOW the undersigned, pursuant to Virginia Code 8.01-506.1 (1950), and after being duly sworn states that he is the attorney for the plaintiff herein; that he believes that there are books and writings in the possession of the defendant, which contain material evidence and that such writings are reasonably specified as follows:

1. Each and all of the following in which the defendant has a sole or partial interest:

a. Check books, check registers, and other writings describing checks written during the immediate past twelve months.

b. Canceled checks, drafts and orders for the immediate past twelve months.

c. Bank statements and savings account statements rendered in the immediate past twelve months.

d. Stock certificates, certificates of deposit, money market certificates, bonds, and other written evidence of ownership of intangible property.

e. Deeds, deeds of trust, mortgages, security instruments and notes of indebtedness on real estate, wherever situated.

f. Titles to motor vehicles, boats, trailers, and mobile homes, and the registration certificates for each.

g. Agreements reflecting defendant's ownership, whether sole or partial, of any business(es).

h. Life insurance policies, annuities, pension plans, deferred compensation plans, stock option plans, and profit-sharing plans.

i. Negotiable instruments, non-negotiable instruments, promissory notes, and other instruments or documents of indebtedness.

j. Federal and state income tax returns, including all schedules and income reporting forms thereto, for the past two calendar years.

k. Contracts entered into with any person or entity which are in force and effect.

l. Credit agreements, loan agreements and installment purchase agreements.

m. Cash receipts books, cash disbursements books, purchase books, sales books, accounts receivable books, accounts payable books, payroll books, tax books, balance sheets and profit and loss statements, schedules of real estate interest, schedule of fixed assets, schedules of inventory, minutes books, stock ledgers, and financial statements, annual minutes and annual reports, certificate of partnership and partnership agreements for the past two calendar years.

These books and writings contain evidence material in determining whether there are, or might be, assets available to satisfy the judgment. The plaintiff has not caused a summons to answer interrogatories to be issued against the defendant within six (6) months last preceding the date of this Affidavit.

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Commonwealth of Virginia:

County of Fairfax :

Subscribed and sworn to before me this \_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_,20\_\_ by .

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Notary Public

My Commission Expires: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_