

1 *{YOUR INFO HERE}*

2
3 *{YOUR NAME}*, In Pro Per

4
5 **Superior Court of California**
6 **For the County of *{YOUR COURT}***

7)	Case No.: <i>{YOUR CASE NUMBER}</i>
8	<i>{JDB HERE}</i> ,)	
9	Plaintiff,)	DEFENDANT'S FIRST REQUEST FOR
10	vs.)	PRODUCTION OF DOCUMENTS
11	<i>{YOUR NAME HERE}</i> ,)	(Code Civ. Proc. §2031.010 <i>et seq.</i>)
12	Defendant)	

13
14 PROPOUNDING PARTY: DEFENDANT *{YOUR NAME HERE}*

15 RESPONDING PARTIES: PLAINTIFF *{JDB HERE}*

16
17 SET NO.: 1 (One)

18
19 Pursuant to §2031 of the California Code of Civil Procedure, please provide and serve, within 30
20 days of the date of service of this request, the written response and statement required pursuant to
21 CCP §§2031 (g), (h) and (i) and please produce for inspection and copying within 30 days of the
22 date of service of this request, at 9:30 a.m., at *{YOUR ADDRESS}* the following DOCUMENTS
23 and things listed below.

24
25 **I. DEFINITIONS**

26
27 “DOCUMENT” means and includes, but is not limited to, the following: ANY writings, drawings,
28 graphs, charts, photographs, phonograph records, tape recordings, notes, diaries, calendars,

1 checkbooks, books, papers, accounts, memoranda, correspondence, reports, spreadsheets, working
2 papers, drafts, appointment books, videotape recordings,
3 and ANY computer-generated, computer-stored or electronically stored matter, such as e-mail,
4 instant messages, computer databases and electronic data stored on hard disks, floppy disks,
5 magnetic tape or other electronic storage medium, as well as ANY other written, typed, printed,
6 graphic or recorded matter of ANY kind, however produced or reproduced; ALL “writings” within
7 the meaning of California Evidence Code §250; and ALL “writings,” “recordings” and
8 “photographs” within the meaning of Federal Rules of Evidence §1001. Any written, printed or
9 electronic copies of DOCUMENTS bearing notations, marks or codes not found in the original
10 shall be deemed to be different DOCUMENTS and shall also be produced.

11 “ANY” shall mean “any and all.” Similarly, “ALL” means “any and all.”

- 12
- 13 1. ALL DOCUMENTS relating to or constituting ANY agreement between defendant and Chase
- 14 Bank.
- 15 2. ALL DOCUMENTS relating to or constituting ANY assignment to plaintiff of the account
- 16 referred to in the complaint.
- 17 3. ALL DOCUMENTS constituting statements of account number ***{YOUR ACCT NUMBER}***
- 18 showing all payments and credits from inception until present.

19

20

21 ***{DATE}***

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25 ***{YOUR NAME HERE}***

26 In Pro Per

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