

1 _____ (Full Name)
2 _____ (Email Address)
3 _____ (Address Line 1)
4 _____ (Address Line 2)
5 _____ (Phone Number)

6 _____ in Pro Per
(indicate Plaintiff or Defendant)

8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**

11 _____,
12 **Plaintiff,**
13 **vs.**
14 _____
15 _____,
16 **Defendant(s).**

Case No: _____

REQUEST FOR PRODUCTION

TO: _____
(name of responding party)

Set no. _____

18 Pursuant to Federal Rule of Civil Procedure 34, _____
(your name)
19 (“Requestor”) hereby requests that _____, respond to the
(name of responding party)
20 following requests for production (the “Requests,” and each a “Request”) within
21 thirty (30) days after service of these Requests, and produce and permit inspection
22 and copying of the documents described therein.
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24 The place of inspection shall be located at _____
(address)
25 _____ and shall take place on
(address continued)
26 _____ at _____ . In lieu of making a personal appearance on
(date) (time)
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1 the production date, copies of the requested documents may be appended to the
2 response to this request for production.

3 DEFINITIONS

4 Unless otherwise indicated, the following definitions shall be applicable to
5 these Requests:

6 1. The words “YOU” or “YOUR” or any derivative thereof mean
7 _____, and any predecessors and/or successors in
8 (name of responding party)
9 interest, including but not limited to its present and former members, officers,
10 agents, employees, and all other persons acting or purporting to act on its behalf,
11 including but not limited to all present or former members, officers, agents,
12 representatives, attorneys, employees, and all other persons exercising or
13 purporting to exercise discretion, make policy, and/or make decisions.

14 2. The words “DOCUMENT” and “DOCUMENTS” shall have the
15 broadest possible meaning pursuant to Federal Rule of Civil Procedure 34 and
16 include, without limitation, all COMMUNICATIONS, WRITINGS,
17 RECORDINGS, PHOTOGRAPHS, and all tangible or intangible things upon
18 which any handwriting, typing, printing, drawing, or other form of communication
19 is recorded or reproduced, and includes preliminary drafts as well as any and all
20 non-identical copies of any of the foregoing now in the possession, custody, or
21 control of YOU or YOUR counsel, agents, employees, and any and all persons
22 acting on YOUR behalf.

23 3. The words “WRITINGS,” “RECORDINGS,” and
24 “PHOTOGRAPHS” shall have the broadest possible meaning pursuant to Federal
25 Rule of Evidence 1001.

26 4. The words “COMMUNICATION” and “COMMUNICATIONS” are
27 used in the broadest sense and shall include the transmittal of any kind of
28 information (in the form of facts, opinions, ideas, inquiries, or otherwise)

1 regardless of medium, including but not limited to any and all inquiries,
2 discussions, conferences, conversations, negotiations, agreements, meetings,
3 interviews, telephone conversations, letters, correspondence, notes, telegrams,
4 facsimiles, email, text messages, social media (e.g., Facebook, Instagram, Twitter/
5 X, etc.), messaging application (e.g., WhatsApp, Facebook Messenger, Telegram,
6 etc.), memoranda, or other forms of oral and/or written communications.

7 5. The term “RELEVANT PERIOD” means _____
8 through the present. (date)

9 6. The present tense includes the past and future tenses. The singular
10 includes the plural, and the plural includes the singular. The words “AND” and
11 “OR” shall be construed disjunctively or conjunctively so as to require the
12 broadest possible response to any given request. The word “ALL” means “any
13 and all;” the word “ANY” means “any and all.” The word “INCLUDING” means
14 “including but not limited to.” Words in the masculine, feminine, or neuter form
15 shall include each of the other genders.

16 *(list any additional definitions below)*

17 7. _____
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23 8. _____
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1 **INSTRUCTIONS**

2 1. The provisions and definitions contained in the Federal Rules of Civil
3 Procedure and the Local Rules of the United States District Court for the Central
4 District of California are incorporated by reference as if fully set forth herein.
5 Unless otherwise indicated, the DOCUMENTS to be produced include all
6 DOCUMENTS prepared, sent, dated or received, or which otherwise exist at any
7 time during the RELEVANT PERIOD covered by these Requests.

8 2. These Requests shall be deemed continuing and, to the extent that
9 YOUR responses may be enlarged, diminished, supplemented, or otherwise
10 modified by documents or information acquired subsequent to YOUR initial
11 response to these Requests, YOU shall promptly supplement YOUR responses
12 and production.

13 3. DOCUMENTS should be produced in their complete and unaltered
14 form. Attachments to DOCUMENTS should not be removed. The
15 DOCUMENTS should not be cut up, pasted over, redacted, or altered in any way
16 for any reason, including alleged non-relevance. If emails are produced that had
17 attachments, the attachments shall be attached.

18 4. YOU are to produce all requested DOCUMENTS which are in
19 YOUR possession, custody, or control, including but not limited to all such
20 DOCUMENTS in the possession of any of YOUR agents, employees, or
21 attorneys, and any other person under YOUR control or acting on YOUR behalf.

22 5. For any requested DOCUMENT no longer in YOUR possession,
23 custody, or control, provide the following information: (a) a detailed description
24 of the DOCUMENT; (b) the identity of the person or entity, including his, her,
25 their, or its address, believed by YOU to have possession or custody of the
26 DOCUMENTS or any copies thereof; and (c) a description of the efforts, if any,
27 YOU have made to obtain possession or custody of the DOCUMENTS. For any
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1 requested DOCUMENT that has been destroyed, state what DOCUMENT has
2 been destroyed, when the DOCUMENT was destroyed, why it was destroyed, and
3 all persons who participated in or were involved in the decision to destroy.

4 6. Each DOCUMENT requested herein shall be produced in its entirety
5 and without deletion or excisions, regardless of whether YOU consider the entire
6 DOCUMENT to be relevant or responsive to a Request. If YOU have redacted
7 any portion of the DOCUMENT, YOU shall stamp the word “redacted” on each
8 page of the DOCUMENT that YOU have redacted. Any redaction must be clearly
9 visible on the redacted DOCUMENT. If any DOCUMENT covered by these
10 Requests contains a redaction, YOU shall identify such DOCUMENT and all
11 redactions on a log specifically identifying the following: (a) the type of
12 DOCUMENT; (b) any addressor and addressee; (c) any indicated or blind copies;
13 (d) the date of the DOCUMENT; (e) a detailed description of the general subject
14 matter of the DOCUMENT, including but not limited to the number of pages, and
15 any attachments or appendices; (f) all persons to whom the DOCUMENT was
16 distributed, shown, or explained; and (g) the nature and basis of the privilege or
17 grounds for withholding being asserted sufficient to enable the parties and the
18 Court to assess its validity.

19 7. If any DOCUMENT requested herein is withheld from production on
20 the basis of any claim or privilege or other protection or immunity from
21 disclosure, YOU shall furnish a log specifically identifying the following: (a) the
22 type of DOCUMENT; (b) any addressor and addressee; (c) any indicated or blind
23 copies; (d) the date of the DOCUMENT; (e) a detailed description of the general
24 subject matter of the DOCUMENT, including but not limited to its title, subject,
25 purpose, the name(s) and position(s) of the author(s), number of pages, and any
26 attachments or appendices; (f) all persons to whom the DOCUMENT was
27 distributed, shown, or explained; and (g) the nature and basis of the privilege or
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1 grounds for withholding being asserted sufficient to enable the parties and the
2 Court to assess its validity.

3 8. If a responsive requested DOCUMENT contains both privileged and
4 non-privileged material, the non-privileged material must be disclosed to the
5 fullest extent possible without disclosure of the privileged material. If YOU assert
6 privilege with regard to part of a DOCUMENT, YOU must clearly indicate the
7 portions as to which the privilege is claimed.

8 9. YOU must produce DOCUMENTS in accordance with Federal Rule
9 of Civil Procedure 34(b)(2)(E). All DOCUMENTS should be Bates-numbered or
10 labeled with a unique identifier on each page. DOCUMENTS should be produced
11 either (1) with labels corresponding to the specific Request(s) to which they
12 respond, or (2) in a format where it is clear which document is responsive to which
13 particular Request(s).

14 10. If YOU make an objection to any Request, YOU must state whether
15 any responsive materials are being withheld on the basis of YOUR objection.
16 If YOU are in doubt about the meaning of a Request, without waiver of the
17 Requestor's rights to seek a full and complete response to the Request, please
18 assume a reasonable meaning, state what the assumed meaning is in YOUR
19 response, and respond to the Request according to YOUR assumed meaning.

20 *(list any additional instructions below)*

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REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

REQUEST FOR PRODUCTION NO. 2:

REQUEST FOR PRODUCTION NO. 3:

1 **REQUEST FOR PRODUCTION NO. ___ :**

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10 **REQUEST FOR PRODUCTION NO. ___ :**

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19 **REQUEST FOR PRODUCTION NO. ___ :**

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1 **REQUEST FOR PRODUCTION NO. ___:**

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DATED: _____

By: _____
(sign)

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(indicate Plaintiff or Defendant)

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PROOF OF SERVICE

I, _____, declare as follows:
(name of person serving documents)

My address is _____,
_____, which is located in
the county where the mailing described below took place.

On _____, I served the document described as **Request for**
(date of mailing)
Production on all interested parties in this action by placing a true and correct
copy thereof in a sealed envelope, with first-class postage prepaid thereon, and
deposited said envelope in the United States mail at or in _____
(city and state of mailing)

_____ addressed to:

_____ (name) _____ (name)
_____ (address) _____ (address)
_____ (address) _____ (address)
_____ (address) _____ (address)

I declare under penalty of perjury that the foregoing is true and correct.

Executed on _____ at _____.
(date) (city and state of signing)

(sign)

(print name)