

1 SELARZ LAW CORP.
DANIEL E. SELARZ (State Bar No. 287555)
2 *dselarz@selarzlaws.com*
11777 San Vicente Blvd., Suite 702
3 Los Angeles, California 90049
Telephone: 310.651.8685
4 Facsimile: 310.651.8681

5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME(S)]

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF [COUNTY], [DISTRICT]**

10 [PLAINTIFF(S)], an individual,
11 Plaintiff,

vs.

12 [DEFENDANT(S)], and DOES 1 to [#],
13 inclusive,
14 Defendants.

Case No. []
Honorable []
[Dept. [#]]

**PLAINTIFF'S REQUESTS FOR
PRODUCTION OF DOCUMENTS,
SET ONE**

Action Filed: []
Trial Date: []

16 PROPOUNDING PARTY : PLAINTIFF [CLIENT'S NAME]
17 RESPONDING PARTY : DEFENDANT [DEFENDANT'S NAME]
18 SET NUMBER : ONE

19 PLAINTIFF [CLIENT'S NAME] ("PLAINTIFF"), requests that Defendant
20 [DEFENDANT'S NAME] ("DEFENDANT") identify, produce and permit the inspection
21 and copying of the following DOCUMENTS and things, pursuant to California Code of
22 Civil Procedure Section 209.010. PLAINTIFF requests that the following Documents and
23 things be identified, produced and made available for inspection and copying at the law firm
24 of Selarz Law Corp., located at 11777 San Vicente Blvd., Suite 702, Los Angeles, California
25 90049. Alternatively, there may be full compliance with this request by forwarding copies
26 of the items requested herein directly to Selarz Law Corp. If the Defendant chooses to
27 produce the items requested at the office of counsel for PLAINTIFF rather than mail copies,
28 a telephone call or other notice should be provided no less than three (3) days ahead of time

1 so that definite arrangements can be made for someone to be present to conduct the
2 duplication and have the appropriate equipment available.

3 Further, pursuant to California Code of Civil Procedure §§209.210 and 209.260, the
4 party on whom the request is served shall serve a written response subscribed under oath by
5 such party, within thirty (30) days after the service of the request, stating whether (a) YOU
6 intend to comply with each of the individual requests for production; (b) YOU are unable
7 to comply with the requests for production and, if so, the reason for YOUR inability to
8 comply after a diligent search; or (c) YOU intend to object to an item or category of items
9 specified in this request and, if so, the grounds therefore. If an objection is made to part of
10 an item or individual request, or to part of a category of items or individual requests, the
11 part objected to shall be specified

12 DEFINITIONS

13 A. “PERSON(S)” includes any natural person, firm, association, organization,
14 partnership, business, trust, corporation, governmental or public entity or any other form of
15 legal entity.

16 B. “DOCUMENT” or “DOCUMENTS” shall mean all documents,
17 electronically stored information, and tangible things, including without limitation all
18 writings (as defined in Section 250 of the California *Evidence Code*) and all other means of
19 recording information, whether written, transcribed, taped, filmed, microfilmed, or in any
20 other way produced, reproduced, or recorded, and including but not limited to: originals,
21 drafts, computer-sorted and computer-retrievable information, copies and duplicates that
22 are marked with any notation or annotation or otherwise differ in any way from the original,
23 correspondence, memoranda, reports, notes, minutes, contracts, agreements, books, records,
24 checks, vouchers, invoices, purchase orders, ledgers, diaries, logs, calendars, computer
25 printouts, computer disks, card files, lists of persons attending meetings or conferences,
26 sketches, diagrams, calculations, evaluations, analyses, directions, work papers, press
27 clippings, sworn or unsworn statements, requisitions, manuals or guidelines, audit work
28 papers, financial analyses, tables of organizations, charts, graphs, indices, advertisements

1 and promotional materials, audited and unaudited financial statements, trade letters, trade
2 publications, newspapers and newsletters, photographs, emails, electronic or mechanical
3 records, facsimiles, telegrams and telecopies, and audiotapes. Each draft, annotated, or
4 otherwise non-identical copy is a separate DOCUMENT within the meaning of this term.
5 DOCUMENTS shall also include any removable sticky notes, flags, or other attachments
6 affixed to any of the foregoing, as well as the files, folder tabs, and labels appended to or
7 containing any documents. DOCUMENTS expressly include all ELECTRONIC
8 RECORDS.

9 C. “COMMUNICATION(S)” means any oral, written or electronic transmission
10 of information, including but not limited to meetings, discussions, conversations, telephone
11 calls, telegrams, memoranda, letters, telecopies, telexes, conferences, messages, notes or
12 seminars.

13 D. “RELATING TO,” “RELATED TO” or “RELATE(S) TO” means
14 constituting, containing, concerning, embodying, reflecting, identifying, stating,
15 mentioning, discussing, describing, evidencing, or in any other way being relevant to that
16 given subject matter.

17 E. “PLAINTIFF” shall mean PLAINTIFF [CLIENT’S NAME].

18 F. “DEFENDANT,” “YOU” and “YOUR” shall mean DEFENDANT
19 [DEFENDANT’S NAME].

20 G. “SUBJECT INCIDENT” means and refers to the incident on [Date of
21 Incident], described in PLAINTIFF’s Complaint upon which this suit is founded.

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1 **REQUESTS FOR PRODUCTION/INSPECTION**

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

3 All DOCUMENTS identified, directly or indirectly, in YOUR answers to
4 Interrogatories.

5 **REQUEST FOR PRODUCTION NO. 2:**

6 All written reports of all expert witnesses with whom YOU or YOUR attorneys have
7 consulted, including, of course, those persons YOU expect to call as an expert witness at
8 trial.

9 **REQUEST FOR PRODUCTION NO. 3:**

10 All DOCUMENTS upon which any expert witness YOU intend to call at trial relied
11 to form an opinion.

12 **REQUEST FOR PRODUCTION NO. 4:**

13 The most recent resume or curriculum vitae of each expert whom YOU expect to call
14 as an expert witness at trial.

15 **REQUEST FOR PRODUCTION NO. 5:**

16 All notes, correspondence, bills, invoices, diagrams, photographs, x-rays or other
17 documents prepared or reviewed by each person whom YOU expect to call as an expert
18 witness at trial.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 All invoices generated by expert witnesses generated for performing all expert
21 witness services to the DEFENDANT, including but not limited to, the fees for the medical
22 examination, the records review, the pretrial preparation, any telephone conference, any
23 trial testimony anticipated and any other fee paid by the DEFENDANTS for expert fees.

24 **REQUEST FOR PRODUCTION NO. 7:**

25 All written, recorded, or signed statements of any party, including the PLAINTIFF,
26 DEFENDANT, witnesses, investigators, or agent, representative or employee of the parties
27 concerning the subject matter of this action.

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1 **REQUEST FOR PRODUCTION NO. 8:**

2 All DOCUMENTS, photographs, videotapes or audio tapes, x-rays, diagrams,
3 medical records, surveys or other graphic representations of information concerning the
4 subject matter of this action, the PLAINTIFF, or property damage.

5 **REQUEST FOR PRODUCTION NO. 9:**

6 Any DOCUMENTS which afforded liability insurance coverage for the incident
7 which is the subject matter of the PLAINTIFF'S Complaint.

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

9 Any DOCUMENTS identified in any other parties' Answers to Interrogatories.

10 **REQUEST FOR PRODUCTION NO. 11:**

11 Any DOCUMENTS received pursuant to a subpoena request in this case.

12 **REQUEST FOR PRODUCTION NO. 12:**

13 Any DOCUMENT prepared during the regular course of business as a result of the
14 incident complained of in the PLAINTIFF'S Complaint.

15 **REQUEST FOR PRODUCTION NO. 13:**

16 Copies of any treaties, standards in the industry, legal authority, rule, case, statute,
17 or code that will be relied upon in the defense of this case.

18 **REQUEST FOR PRODUCTION NO. 14:**

19 All maintenance records concerning the vehicle being driven by the YOU on the date
20 of the accident for the two (2) years prior to the auto accident.

21 **REQUEST FOR PRODUCTION NO. 15:**

22 Any and all invoices, logs, sales receipts, itineraries, or schedules for the
23 DEFENDANT.

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1 **REQUEST FOR PRODUCTION NO. 16:**

2 A copy of YOUR cell phone records, including times and dates of text messages,
3 from [Date of Incident], between [Two Hours before Incident] and [Two Hours after
4 Incident].

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7 DATED: May 23, 2018

SELARZ LAW CORP.

8
9 By: _____
10 Daniel E. Selarz, Esq.
11 **Attorneys for Plaintiff(s),**
12 [Client's Name(s)]

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PROOF OF SERVICE
Case No. [REDACTED]

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I, the undersigned, declare as follows:
I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 23, 2018 I served the foregoing document(s) **PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 23, 2018, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Daniel E. Selarz

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SERVICE LIST

SENT VIA U.S. MAIL

[Attorney's Name]
[Law Firm Name]
[Street Address]
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]