

1 SELARZ LAW CORP.
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3 Los Angeles, California 90049
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4 Facsimile: 310.651.8681

5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME(S)]
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF [COUNTY], [DISTRICT]**
9

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], hereby requests that Defendant [DEFENDANT'S
20 NAME] identify, produce and permit the inspection, copying, testing, and/or sampling of
21 the following documents and things, pursuant to California Code of Civil Procedure Section
22 2031, et seq., and that said identification and production be signed, verified, and served
23 within thirty (30) days after service.

24 The inspection, copying, testing, or sampling, and performance of any related
25 activity, will take place at the law firm of Selarz Law Corp., located at 11777 San Vicente
26 Blvd., Suite 702, Los Angeles, California 90049. Upon inspection, copying, testing, or
27 sampling, and performance of any related activity, the documents or things produced may
28 be permanently altered or destroyed.

DEFINITIONS

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

B. “DEFENDANT,” “YOU” and “YOUR” shall mean DEFENDANT [DEFENDANT’S NAME].

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

D. “SUBJECT PREMISES” means and refers to the property on which the SUBJECT INCIDENT occurred, located at [Premises Address].

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents identified in YOUR answers to PLAINTIFF’S Form Interrogatories, served herewith.

REQUEST FOR PRODUCTION NO. 2:

All documents identified in YOUR answers to PLAINTIFF’S Special Interrogatories, served herewith.

REQUEST FOR PRODUCTION NO. 3:

All documents which afforded liability insurance coverage for the SUBJECT INCIDENT.

REQUEST FOR PRODUCTION NO. 4:

All written or recorded statements of any individual concerning the SUBJECT INCIDENT.

REQUEST FOR PRODUCTION NO. 5:

All photographs, films or videotapes depicting any place, object or individual concerning the SUBJECT INCIDENT.

REQUEST FOR PRODUCTION NO. 6:

All photographs, films or videotapes depicting PLAINTIFF’S injuries.

REQUEST FOR PRODUCTION NO. 7:

All diagrams, reproduction or model of any place or thing concerning the SUBJECT

1 INCIDENT.

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

3 All reports made by any individual concerning the SUBJECT INCIDENT.

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

5 All surveillance, including photographs or video, of any individual conducted
6 concerning the SUBJECT INCIDENT.

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

8 All surveillance, including photographs or video, of any individual conducted
9 concerning any party to this action.

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

11 All written reports prepared on the surveillance of any individual conducted
12 concerning the SUBJECT INCIDENT.

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

14 All written reports prepared on the surveillance of any individual conducted
15 concerning any party to this action.

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

17 All documents that support YOUR denial or special or affirmative defenses to this
18 action.

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

20 All documents that support YOUR contention that any person, other than YOU or
21 PLAINTIFF, contributed to the SUBJECT INCIDENT.

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

23 All documents that support YOUR contention that any person, other than YOU or
24 PLAINTIFF, contributed to PLAINTIFF'S damages.

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

26 All documents that support YOUR contention that PLAINTIFF was not injured in
27 the SUBJECT INCIDENT.

28 **REQUEST FOR PRODUCTION NO. 17:**

1 All documents that support YOUR contention that the injuries or the extent of
2 injuries claimed by PLAINTIFF were not caused by the SUBJECT INCIDENT.

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

4 All documents that support YOUR contention that any of the services furnished by
5 any health care provider claimed by PLAINTIFF were not due to the SUBJECT
6 INCIDENT.

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

8 All documents that support YOUR contention that any of the costs of services
9 furnished by any health care provider claimed as damages by PLAINTIFF were not
10 necessary or reasonable.

11 **REQUEST FOR PRODUCTION NO. 20:**

12 All documents that support YOUR contention that any part of the loss of earnings or
13 income claimed by PLAINTIFF was unreasonable or not caused by the SUBJECT
14 INCIDENT.

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

16 All documents that support YOUR contention that any of the property damage
17 claimed by PLAINTIFF was not caused by the SUBJECT INCIDENT.

18 **REQUEST FOR PRODUCTION NO. 22:**

19 All documents that support YOUR contention that any of the costs of repairing
20 property damage claimed by PLAINTIFF were unreasonable.

21 **REQUEST FOR PRODUCTION NO. 23:**

22 All documents concerning claims for personal injuries made before or after the
23 SUBJECT INCIDENT by PLAINTIFF.

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

25 All documents concerning the past or present physical, mental, or emotional
26 condition of PLAINTIFF.

27 **REQUEST FOR PRODUCTION NO. 25:**

28 YOUR cell phone records, including times and dates of text messages, from the date

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of the SUBJECT INCIDENT, from two hours prior to the SUBJECT INCIDENT to two hours after the SUBJECT INCIDENT.

DATED: May 24, 2020

SELARZ LAW CORP.

By: _____
Daniel E. Selarz, Esq.
Attorneys for Plaintiff(s),
[Client's Name(s)]

PROOF OF SERVICE
Case No. [_____]

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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 24, 2020 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 24, 2020, 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]]