

<INSERT "fam-1 caption.wpt">

## MOTION TO PRODUCE

<Client's party designation::LIKE THIS> requests pursuant to Trial Rule 34 that the <Opposing party's party designation::LIKE THIS> produce for inspection and copying the following:

1. Copies of your federal and state income tax returns, with W-2 s attached, for two years preceding the date of this Motion to Produce.

2. Copies of your last four (4) statements from any and all financial institutions in which you have funds in your name, individually, or with any other person. Financial institution shall include any bank, loan association, credit union, savings bank, private bank, industrial loan, investment companies, or stock brokers.

3. Copies your last statement from any and all IRA s, pensions, retirements, or Profit Sharing Plans or accounts.

4. Copies of your last monthly statements from any and all credit card accounts.

5. Copies of all exhibits that you intend to introduce at trial of this cause <IF Does the county require a financial declaration?>

6. A completed <County where court is> County Financial Declaration. <END IF> <IF Is there other info we want?>

7. <Other info we want> <END IF>. <IF Is the opposing party in business?>

8. Copies of all receipts of monies paid to you for the past 12 months.

9. Documentation showing all receivables to your business for three years preceding the date of this Motion to Produce. <END IF>

You are requested to produce the items set forth herein above for inspection, sampling, photocopying, or examination by <Client's party designation> or <Client's party designation>'s attorney at the office of <MY NAME>, Attorney At Law, <MY ADDRESS1>, Anderson, IN <MY ZIP CODE>, which in thirty (30) days after the date of service, or five (5) days prior to hearing in this matter, whichever date is earlier.

Respectfully submitted,

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Samuel C. Hasler, 11971-48  
Attorney for «Client's party designation»  
«MY ADDRESS1»  
Anderson, IN 46016  
765-641-7906

### Certificate of Service

I hereby certify that a copy of the foregoing has been furnished to «IF Does opposing party have an attorney?»  
«Opposing attorney name», attorney for «Opposing party's party designation»,«ELSE» «Opposing party's  
name»«END IF» «How served on opposing party» on \_\_\_\_\_.

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Samuel C. Hasler  
«IF Is the attorney out of town?»«INSERT "fam - letter to opposing atty send MTP.wpt"»«END IF»