

NO. _____

IN THE INTEREST OF

AND

CHILDREN

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IN THE DISTRICT COURT

395TH JUDICIAL DISTRICT

WILLIAMSON COUNTY, TEXAS

RESPONDENT MOTHER'S RULE 194 REQUESTS FOR DISCLOSURE

To: Texas Department of Family and Protective Services, by and through its attorney of record, Brent Webster, Assistant County Attorney, 405 Martin Luther King Ave, Georgetown, Texas 78626.

Pursuant to Rule 194 of the Texas Rules of Civil Procedure, you are requested to disclose, within 30 days after service of this request, the information or material described in rule 194 as set forth in the attached request. The originals or copies of documents and other tangible items requested must be produced for inspection and copying at Patricia L. Brown and Associates, P.C. at 595 Round Rock West, Suite 201, Round Rock, Texas 78681 within 30 days after service of this request, together with a written response. Each written response must be preceded by the request to which it applies. No objection or assertion of work product privilege is permitted to a request under this rule. If you fail to comply with this request, the court may order sanctions against you in accordance with the Texas Rule of Civil Procedure. Your response must be signed.

Respectfully submitted,

Patricia L. Brown & Associates, P.C.
595 Round Rock West Suite 201
Round Rock, Texas 78681
Tel: (512) 246-1149
Fax: (512) 255-3657

By: _____
Chris McHam
State Bar No. 24041447
Attorney for _____

Certificate of Service

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on _____.

By: _____
Chris McHam
Attorney for _____

1. State the correct names of the parties to this lawsuit.
2. State the names, addresses, and telephone numbers of any potential parties.
3. State the legal theories and, in general, the factual bases of the claims or defenses of the Texas Department of Family and protective Services.
4. State the names, addresses, and telephone numbers of persons having knowledge of relevant facts, and give a brief statement of each identified person's connection with the case.
5. For any testifying expert –
 - a. State the expert's name, address, and telephone number;
 - b. State the subject matter on which the expert will testify;
 - c. State the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them or, if the expert is not retained by, employed by, or otherwise subject to the control of the Texas Department of Family and Protective Services, documents reflecting such information.
 - d. If an expert is retained by, employed by, or otherwise subject to the control of the Texas Department of Family and Protective Services, product the originals or copies of the following:
 - i. All documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
 - ii. the expert's current resume and bibliography.
6. Produce the originals or copies of any witness statements described in rule 192.3(h) provides in part as follows:

Statements of Persons with Knowledge of Relevant Facts. A party may obtain discovery of the statement of any person with knowledge of relevant facts – a “witness statement” – regardless of when the statement was made. A witness statement is (1) a written statement signed or otherwise adopted or approved in writing by the person making it, or (2) a stenographic, mechanical, electrical, or other type of recording of a witness's oral statement, or any substantially verbatim transcription of such a recording. Any person may obtain, upon written request, his or her own statement concerning the lawsuit, which is in the possession, custody or control of any party.
7. Produce the originals or copies of all medical records and bills obtained by Texas Department of Family and Protective Services by virtue of an authorization furnished by _____.