

**REQUEST FOR PRODUCTION OF DOCUMENTS IN
HIGH-ASSET DIVORCE**

INSTRUCTIONS

A. The documents shall be organized by you, labeled, and produced in accordance with the categories in the request.

B. This request is continuing in character, requiring you to promptly amend or supplement your responses if you obtain further material information.

C. If any document called for by this request is withheld in whole or in part under any claim of privilege, for each document:

1. Identify the date, place, author or speaker, and recipient of each privileged communication or document containing the privileged information;
2. Describe the legal capacity of each author, speaker, or recipient with respect to the communication or document (i.e., trustee, corporate officer, or attorney);
3. State the basis for the claim of privilege; and
4. State the subsection of the request to which the information claimed to be privileged is responsive.

D. If any document was at one time in existence, but is no longer in existence, state for each document: the type of document; the date upon which it ceased to exist; the circumstances under which it ceased to exist; and the name, address, and telephone number of each person having knowledge of the contents of the document.

E. If any portion of a request cannot be satisfied in full, you are to fulfill it to the greatest extent possible, specifying the reasons for your inability to supply all the documents requested, and stating whatever information, knowledge or belief you possess concerning the missing or unsatisfied portion of the request.

F. To the extent no single document exists or is in your possession, custody, or control that contains all the information sought in any particular specification herein, you are to provide such other documents in your possession, custody, or control that are sufficient to show, compute, compile, or explain all the information requested in such specifications or as much thereof as possible.

G. The terms “and” or “or” should be read conjunctively to bring within the scope of this request any documents that might otherwise be outside its scope.

H. Whenever appropriate, the singular form of a word shall also be interpreted as its plural.

DEFINITIONS

A. “Defendant” or “Counter-Plaintiff” shall refer to _____.

B. “You” and “your” shall refer to the party providing responses to these requests, and any of his/her/its actual or apparent agents, servants, or employees.

C. The “complaint”, “counterclaim”, “cross-claim”, “answer” and the like shall refer to the pertinent pleading filed in the Circuit Court for _____ County, _____, and assigned Case No. _____.

D. The term “incident”, “event” or “events” shall refer to the facts alleged by the complaint, counterclaim, and/or other such pleading.

E. The term “communication” or “communications” shall mean the transmittal of information by any means.

F. The term “document” or “documents” includes all electronically stored information, writings, drawings, graphs, charts, photographs, recordings and other data compilations from which information can be obtained, translated, if necessary, by you through detection devices into reasonably usable form. The term includes, without limitation, papers, books, records, letters, photographs, tangible things, correspondence, facsimile transmissions, communications, telegrams, cables, telex messages, memoranda, e-mails, notes, notations, workpapers, transcripts, minutes, reports and recordings of telephone or other conversations or of interviews or of conferences, or of other meetings, affidavits, statements, summaries, opinions, reports, studies, analyses, evaluations, contracts, agreements, jottings, agenda, bulletins, notices, announcements, advertisements, instructions, charts, manuals, brochures, publications, schedules, price lists, client lists, journals, statistical records, desk calendars, appointment books, diaries, lists, tabulations, sound recordings, computer printouts, data processing program library, data processing input and output, microfilm, books of account, records and invoices reflecting business operations, all records kept by electronic, photographic, or mechanical means, any notes or drafts relating to the foregoing, and all things similar to any of the foregoing, however denominated.

G. The phrases “relate to” and “relating to” mean constituting, comprising, containing, setting forth, showing, disclosing, describing, explaining, memorializing, summarizing, concerning, pertaining to, or referring to.

H. The term “person” or “persons” includes natural persons, partnerships, corporations, and other legal entities.

I. Unless otherwise specified, the requested documents shall cover from the commencement of the parties’ marriage, forward.

DOCUMENT REQUESTS

REQUEST NO. 1: Copies of the federal and state income tax returns filed by you, together with accompanying worksheets, including W-2 forms, for the past five years; and copies of federal and state income tax returns and profit and loss statements for any and all corporations, joint ventures, partnerships or other corporate or business associations in which you hold an interest for the past five.

REQUEST NO. 2: All records indicating any and all income received by you from any and all sources for the past five years.

REQUEST NO. 3: All employment information, including without limitation wages, salaries, bonuses, stock options, commissions, travel expense accounts, employer automobile(s) for your use, earnings, income employment contracts, pay raises, promotions, pay-roll deductions, other deductions of any kind, credit union accounts, pension plans, retirement plans, retirement funds, stock plans and stock funds, and other benefits or deductions of any kind which are, were previously, or which may be in the future paid, available, accepted, rejected, credited, offered, withheld for any purpose by any individual, agency, department, company or otherwise, or to which you are, were or may become entitled in the future at any time from the date of marriage to present.

REQUEST NO. 4: Records that relate to any secured or unsecured personal loan made to you within the past five years, whether from a member of your family, a banking institution or any individual or entity.

REQUEST NO. 5: All savings accounts, credit union or other passbooks of yours, including those held by you in your name or in your name jointly with any person or entity, or in your name as trustee for any other person within the past five years (regardless of whether or not the account or accounts have been closed), including any such accounts in your name as custodian for any minor under the Uniform Gift to Minors Act or otherwise, and showing any and all savings deposit of every kind and nature.

REQUEST NO. 6: All checking accounts in your name individually, with another, as trustee or guardian or in which you may have an interest, including checkbooks or check registers, deposit slips, monthly statements and cancelled checks (regardless of whether or not the accounts have been closed) within the past five years.

REQUEST NO. 7: All records pertaining to real estate in which you have acquired or may have acquired an interest during the period of your marriage, including any leases or mortgages related thereto (including monthly payments and present outstanding balance of principle and interest) together with any evidence showing contributions in cash or otherwise made by your to the acquisition of such real estate.

REQUEST NO. 8: Copies of all sales agreements and or options for any real estate owned by you and those held by you in your name or in your name jointly with any other person or in your name in trust or in your name as guardian for any other person within the past five years.

REQUEST NO. 9: Copies of any and all powers of attorney that have been executed by you or to you, to or from your spouse or any other person from the date of marriage to the present time.

REQUEST NO. 10: Copies of any and all brokerage account statements or securities owned by you individually, jointly with any person or entity, or as trustee, guardian or custodian, within the past five years, including in such records, dates of purchase and amounts paid for such securities.

REQUEST NO. 11: Copies of any and all securities and investments owned by you and not reflected in any brokerage account records or statements within the past five years.

REQUEST NO. 12: All records indicating all interest of any kind by you in any and all corporations (foreign or domestic) or any entities not evidenced by certificates or other instruments within the past five years.

REQUEST NO. 13: All records pertaining to stock options in any corporation or other entity exercised or not yet exercised.

REQUEST NO. 14: Copies of all mortgages, notes receivable or other evidence of debts due by you individually, or otherwise, executed or payable within the past five years.

REQUEST NO. 15: Records relative to any and all inter vivo trusts from which benefits have been received, are being received or will be received by you, whether such trusts are revocable or irrevocable.

REQUEST NO. 16: All records of all estates of decedents from which you have received, are receiving or will receive any inheritance in either personal property, real property, assets, in trust or otherwise, or monetary assets of any kind within the past five years.

REQUEST NO. 17: Copies of all financial statements, balance sheets and income statements received by you with respect to any and all proprietorships, joint ventures, partnerships, real trusts, corporations or other legal entities in which you hold or held legal or equitable ownership interest, individually or otherwise within the past five years.

REQUEST NO. 18: Copies of all partnership and/or joint venture agreements to which you are party.

REQUEST NO. 19: Copies of declarations of trust, and minute books for all trusts, to which you are party.

REQUEST NO. 20: Copies of all corporate records (articles of organization, by-laws and minute books) for every corporation in which you have a legal or equitable ownership interest.

REQUEST NO. 21: All books and records showing any fringe benefits available to you from any business entity in which you have a legal or equitable ownership interest, including without limitation, auto expenses, travel expenses, personal living and entertainment expenses, life insurance, bonuses, health, accident and hospital insurance.

REQUEST NO. 22: All records and statements pertaining to interest which you have in any pension, retirement or profit sharing plans, including copies of the Plans from June 28, 1997.

REQUEST NO. 23: Copies of all loan applications and statements of loan accounts for all loans applied for by you, whether or not taken or approved by within the past five years.

REQUEST NO. 24: Copies of any and all personal financial statements prepared by any accountant or other person for you or for any business in which you have or had interest within the past five years.

REQUEST NO. 25: Any and all records pertaining to, or being evidence of, any current outstanding indebtedness, including any suits now pending or previously pending in any court whatsoever, and all cases resolved without litigation or presently being negotiated.

REQUEST NO. 26: Any and all documents, memoranda or writing relating to any interest you may have in real estate, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partner, shareholder, joint venturer, mortgagee, developer, manager or otherwise within the past five years.

REQUEST NO. 27: Copies of all trusts in which you may have a present or contingent interest, including the certificates, if any, indicating such interest,

together with copies of all statements, receipt disbursements, investments and other transactions within the past five years.

REQUEST NO. 28: Records of all bank accounts upon which you have or had a present or contingent interest within the past five years.

REQUEST NO. 29: Life insurance policies or certificates of life insurance currently in existence insuring your life and any disability insurance currently in existence; life insurance policies or certificates of life insurance currently in existence insuring the life of any other person in which you are named as either primary or contingent beneficiary.

REQUEST NO. 30: Copies of all credit cards and charge accounts held by your, in either your name individually, or jointly with another and all monthly statements and receipts received by you in connection with the use of such credit cards and charge accounts within the past five years, together with a list of all businesses where you are authorized to charge purchases to the account of another person or entity.

REQUEST NO. 31: Copies of all financial statements or records both individually as well as for each business entity in which you claim or claimed an interest, containing financial information of any nature which have been submitted by you to banks or lending institutions or to any person or entities in connection with your application for credit or loans within the past five years.

REQUEST NO. 32: A list of all household furniture, furnishings and antiques owned by you individually or jointly with any other person or entity; such list to include the purchase price of each item, the source of the funds used to purchase each item and the current fair market value of each item. If no appraisal figures are available include your opinion of the fair market value.

REQUEST NO. 33: All registrations to motor vehicles currently being used by you.

REQUEST NO. 34: All records pertaining to the transfer by sale or gift or otherwise of any personal property within the past five years.

REQUEST NO. 35: All records pertaining to the acquisition, transfer and sale of all securities within the past five years, such records to include any and all information relative to gains or losses realized from transactions involving such securities.

REQUEST NO. 36: A list of all safe deposit and/or post office boxes rented by you or in which you have had a right of entry for the last five (5) years, giving the location, number and contents of any such boxes and the names under which any such boxes are or were registered.

REQUEST NO. 37: Any and all books, receipts, records, checks or other tangible evidence of charitable donations made by you or on your behalf within the past five years.

REQUEST NO. 38: All records pertaining to any gifts in excess of One Hundred Dollars (\$100.00) of any kind made by you to any person, firm, trust, corporation or other entity within the past five years.

REQUEST NO. 39: A list setting forth the names and addresses of all persons who were witnesses to or have knowledge or information of any relevant facts relating to this action or who possess proof of the incidents or acts involved, their relationship to you and indicating which were eyewitnesses; all written memoranda and reports and photographs submitted to you or your attorney by any such person; and all tape recordings or other evidence prepared from tape recordings made in connection with any wiretapping or other electronic surveillance conducted by you or others on your behalf.

REQUEST NO. 40: Copies of any and all wills and/or trusts wherein you give or are given any beneficial interest, and/or wherein you name or are named as trustee and/or executor, including but not limited to your will and/or trusts and those of your parents and/or close relatives.

REQUEST NO. 41: All records pertaining to any account or accounts or every kind and nature whatsoever in which you have deposited or withdrawn funds or incurred debts or credits, including certificates of deposits within the past five years.

REQUEST NO. 42: All diaries, photographs, written memoranda or documents pertaining to the issues in this case.

REQUEST NO. 43: Any and all documents which substantiate any allegation that you have made in your Complaint for Custody.

REQUEST NO. 44: Copies of all Retainer Agreements with your attorney and a current detailed invoice from your attorney to you for representation in the above captioned matter.

REQUEST NO. 45: Any and all recordings of any statements made by any person relating to any of the issues in this case.

REQUEST NO. 46: Any and all documents you have obtained from a nonparty via subpoena or otherwise.

REQUEST NO. 47: All medical records pertaining to any mental health, psychiatric or other medical care or treatment you have received or sought within the past three years. In the alternative, provide a list of all such health care providers along with a fully executed HIPAA form for each such health care provider.

REQUEST NO. 48: All medical records pertaining to any medical care or treatment received by or sought for any minor child born of the marriage since the day of his or her birth. In the alternative, provide a list of all such health care providers along with a fully executed HIPAA form for each such health care provider.

REQUEST NO. 49: Any and all documents relating to any application for employment that you have completed within the past three years, or to any offers of employment you have received within the past three years.

REQUEST NO. 50: Copies of your complete driving record as maintained by the Motor Vehicle Administration.