

IN THE _____ COURT FOR _____ COUNTY, TENNESSEE
AT _____

_____,)
)
Plaintiff,)
)
vs.) No. _____
)
_____,)
)
Defendant.)

PLAINTIFF'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT

Pursuant to Rule 33.01 of the Tennessee Rules of Civil Procedure, the Plaintiff, _____
("_____"), propounds these Requests for Production of Documents upon the Defendant,
_____ ("You"). You are required to answer these Requests for Production of
Documents, fully, in writing, under oath, on or before _____.

In addition to its common, ordinary meaning, the term "document" as used herein means any
medium upon which intelligence or information can be stored, recorded, or otherwise retrieved,
which is in your possession, custody, control, or which was, but is no longer, in your possession,
custody, or control.

If any requested documents are not produced on the basis of privilege or attorney work-
product, please provide a brief description of each document withheld and a summary of relevant
circumstances sufficient to allow the Court to rule on a motion to compel.

If any requested documents are not produced because the documents are not in your
possession, custody, or control, please provide a brief description of the documents and state the last
known location of the documents.

DOCUMENTS REQUESTED

1. All federal and state income tax returns prepared since the date of this marriage by you or on your behalf, and all forms, schedules and worksheets used in the preparation thereof, and any other documents which were attached thereto or filed therewith.

RESPONSE:

2. All employment agreements and other documents evidencing any agreements between you and your employer(s) or between you and any of your business associates.

RESPONSE:

3. All documents evidencing fringe benefits to which you are entitled from your current employer(s), including but not limited to medical, dental, and/or life insurance, travel and expense accounts, bonuses, stock option plans or other fringe benefits.

RESPONSE:

4. Copies of all letter agreements, incentive plans, deferred compensation plans, stock option agreements, stock purchase agreements and other similar agreements between you and your employer(s) or between you and any of your current business associates.

RESPONSE:

5. Copies of all pay stubs for all paychecks received by you from all employers during the last twelve (12) months.

RESPONSE:

6. All financial statements and loan applications created by you or on your behalf at any time during this marriage, whether submitted to a third party or not.

RESPONSE:

7. All check registers, monthly bank statements and canceled checks created during the last three (3) years for each checking account maintained by you, on which you have had signatory privileges, to which you have made deposits, or from which you have made withdrawals, at any time during this marriage.

RESPONSE:

8. All savings passbooks and monthly bank statements created during the last three (3) years for each savings account maintained by you, on which you have had drawing privileges, to which you have made deposits, or from which you have made withdrawals, at any time during this marriage.

RESPONSE:

9. All statements created during the last three (3) years for each liquid asset account of any type, including, but not limited to, money market accounts, mutual fund accounts, ready asset accounts, cash management accounts, and brokerage accounts, maintained by you, on which you have had drawing privileges, to which you have made deposits, or from which you have made withdrawals at any time during this marriage.

RESPONSE:

10. All statements created during the last five (5) years for each pension plan, profit-sharing plan, IRA, deferred compensation plan, stock option plan, or other type of defined benefit or defined contribution plan of any nature whatsoever in which you have had an ownership interest at any time during this marriage.

RESPONSE:

11. All documents created during the last three (3) years that evidence or relate to each certificate of deposit, money market certificate, treasury bill, and like monetary asset in which you have had an ownership interest since the date of this marriage.

RESPONSE:

12. All documents created during the last five (5) years that evidence or relate to each parcel of real property in which you have had an ownership interest, whether contingent or vested, at any time during this marriage.

RESPONSE:

13. All documents created during the last three (3) years that evidence or relate to each stock, bond or like security in which you have had an ownership interest at any time since the date of this marriage.

RESPONSE:

14. All documents created during the last five (5) years that evidence or relate to each life insurance policy that has been in force on your life at any time since the date of this marriage, including the applicable beneficiary designation(s).

RESPONSE:

15. All documents created during the last five (5) years that evidence or relate to each patent, copyright, invention and royalty in which you have had an ownership interest at any time since the date of this marriage.

RESPONSE:

16. All documents created during the last five (5) years that evidence or relate to each collectible item, antique, precious metal, piece of jewelry, jewel and other like item having any value, in which you have had an ownership interest at any time since the date of this marriage.

RESPONSE:

17. All documents created during the last five (5) years that evidence or relate to each safe, safe deposit box, and other like depository to which you have had a right of access at any time since the date of this marriage.

RESPONSE:

18. All documents that evidence or relate to anything of value inherited or gifted to you at any time since the date of this marriage.

RESPONSE:

19. All monthly statements, monthly bills and all other records created during the last two (2) years for each cellular phone service and for each long distance service used by you at any time during the last two (2) years, regardless whether your use was personal or business related.

RESPONSE:

20. All balance sheets, operating statements, profit and loss statements or reports, accountants' reports, auditors' reports, and financial statements (audited and unaudited), prepared during the last five (5) years by or on behalf of each corporation, partnership, and other business association in which you have had an ownership interest at any time during this marriage.

RESPONSE:

21. All partnership, corporate and other business tax returns, both federal and state, along with supporting documents, prepared or filed during the last five (5) years by or on behalf of each corporation, partnership, and other business association in which you have had an ownership interest at any time during this marriage.

RESPONSE:

22. All partnership agreements created during the last five (5) years for each general and limited partnership in which you have had an ownership interest at any time during this marriage.

RESPONSE:

23. All promissory notes, security agreements and other documents which evidence or relate to each indebtedness over \$1,000.00 owed to you or in which you have had an ownership interest at any time during the past five years or on which you have been personally obligated at any time during this marriage.

RESPONSE:

24. All documents that evidence or relate to each trust created by you or on your behalf or of which you are a beneficiary.

RESPONSE:

25. All documents that evidence or relate to any wills of which you are a beneficiary.

RESPONSE:

26. All statements and annual summaries created during the last two (2) years for each credit card and charge account on which have had charge privileges at any time during this marriage.

RESPONSE:

27. All documents that evidence or relate to a claim by you that any asset at issue in this divorce action is your separate property.

RESPONSE:

28. Copies of all prenuptial agreements and copies of any other agreements entered into between you and your spouse.

RESPONSE:

29. All documents that evidence or relate your current residence, including contracts, lease agreements, appraisals and other such documents.

RESPONSE:

30. All documents that evidence or relate to an estimate of the value of any of your real and personal property, including appraisals, loan applications, insurance riders and other such documents.

RESPONSE:

31. All of your personal and business calendars, day timers, diaries and journals created, maintained or updated at any time during this marriage.

RESPONSE:

32. All personal letters, notes, cards and other such documents written by you to any WOMAN/MAN, other than your spouse, at any time during this marriage, and all personal letters, notes, cards and other such documents received by you from any WOMAN/MAN, other than your spouse, at any time during this marriage.

RESPONSE:

33. All tape recordings and all transcripts of tape recordings which contain the voice of your spouse which relate to or would support an allegation that your spouse has done something that you consider inappropriate or otherwise improper.

RESPONSE:

34. All photographs and videotapes which contain the image of your spouse which relate to or would support an allegation that your spouse has done something that you consider inappropriate or otherwise improper.

RESPONSE:

35. All documents created by or related to the use of all private investigators and other such individuals hired by you or on your behalf at any time during this marriage.

RESPONSE:

36. All appraisals, written opinions, estimates, reports, notes, records, audio and/or video recording and other documentation prepared by and/or relied upon by each person whom you expect to call as an expert witness at the trial in this cause.

RESPONSE:

37. All documents that evidence or relate to an allegation that your spouse has committed inappropriate marital conduct during this marriage.

RESPONSE:

38. Your most recent statement from the Social Security Administration, showing your history of earned income.

RESPONSE:

39. A copy of your most recent credit report.

RESPONSE:

40. Copies of all documents evidencing any and all frequent flier miles, credit card points, and other similar programs in which you have any interest.

RESPONSE:

41. Copies of all governmental permits and licenses that you hold at the present date.

RESPONSE:

42. Copies of all documents evidencing all wire transfers made by you during the last two (2) years.

RESPONSE:

43. A copy of your passport and driver's license.

RESPONSE:

Respectfully submitted,

Larry Hayes, Jr. No. 15481

**Jackson, Kweller, McKinney,
Hayes, Lewis & Garrett**
One Washington Square, Suite 103
214 Second Avenue North
Nashville, TN 37201
(615) 256-2602

Attorney for the Plaintiff,

CERTIFICATE OF SERVICE

I hereby certify that a true and exact copy of the foregoing has been served via the following method(s) upon the following individual(s) on this the ____ day of _____, 201__.

- | | |
|--|--|
| 1. _____, Esq.

_____ | <input type="checkbox"/> Electronic Mail
<input type="checkbox"/> U.S. Mail
<input type="checkbox"/> Facsimile
<input type="checkbox"/> Hand Delivery |
|--|--|

Larry Hayes, Jr.