

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

)
Plaintiff)
vs.) Family Law No.
)
Defendant)

REQUEST FOR PRODUCTION OF DOCUMENTS

TO THE HONORABLE, THE JUDGES OF SAID COURT:

The [Plaintiff/Defendant], (Name), by [his/her] attorneys, _____, requests the [Plaintiff/Defendant] respond within thirty (30) days or such later date as may be provided by the Maryland Rules or Order of Court to the following request:

A. That the [Plaintiff/Defendant] produce and permit the [Plaintiff/Defendant] and [his/her] attorneys to inspect and to copy each of the following original documents which are in the [Plaintiff/Defendant]'s possession, custody or control:

(1) Your federal and state personal income tax returns for the years (Year) through the date of trial.

(2) Corporate tax returns for any corporation in which you possessed an interest during the years (Year) through the date of trial.

(3) All canceled checks on any personal account in which you have or have had a direct or indirect interest from January 1, (Year) through the date of trial.

(4) The ledger portion and monthly statements from any checking account in which you have or have had a direct or indirect interest from January 1, (Year) through the date of trial.

(5) All documentary evidence of profit sharing, pension or retirement funds in which you have or have had an indirect or direct interest from January 1, (Year) through the date of trial.

(6) All savings account passbooks or other documentary evidence of any such accounts which are presently open or closed, in which you have or have had a direct or indirect interest from January 1, (Year) through the date of trial.

(7) All passbooks or other documentary evidence of accounts opened by you for the benefit of another, whether said accounts are now open or closed, from January 1, (Year) through the date of trial.

(8) All records or indicia of ownership or interest in any trust, corporation, partnership, joint venture or any other business venture in which you have or have had a direct or indirect interest from January 1, (Year) through the date of trial.

(9) All deeds and deeds of trust (mortgage) for any and all real estate in which you currently have or have had any interest from January 1, (Year) through the date of trial, whether direct or indirect.

(10) All stocks, bonds, mutual funds or any like asset in which you have or have had any interest (direct or indirect) from January 1, (Year) through the date of trial.

(11) All existing insurance policies on your life which have a cash surrender value or any policies which covered your life from January 1, (Year) through the date of trial.

(12) All instruments or documents or records illustrating indicia of ownership or any other interest you have in any other asset not heretofore mentioned.

(13) All instruments, documents or records evidencing disposition of any assets valued in excess of \$200 in which you have or have had an interest, from January 1, (Year) through the date of trial.

(14) Any documentation or correspondence upon which you intend to base in whole or in part any defense to any portion of the allegations set forth in the [Plaintiff/Defendant]'s Complaint.

(15) Your W-2 forms, K-1's and 1099's from (Year) through the date of trial.

(16) All partnership tax returns filed from (Year) through the date of trial, for any business in which you now have or may have had any interest.

(17) All receipts for credit cards which you have used illustrating each particular charge and monthly statements from January 1, (Year) through the date of trial. This is to include business credit cards which you use and personal credit cards in your name.

(18) All financial statements, loan applications or any similar documents prepared by you or on your behalf from January 1, (Year) through the date of trial. These are to include personal statements as well as statements for any business in which you have any interest.

(19) Evidence of any and all payments made to or received by you from any investment or employment for items other than salary or draw from January 1, (Year) through the date of trial.

(20) Evidence of any current debts which are yours.

(21) Any statements prepared by the [Plaintiff/Defendant] involving any matter which might relate to the facts of this case.

(22) Evidence of any transaction in which you are involved wherein money was loaned by you to an individual or entity from January 1, (Year) through the date of trial, as well as any evidence of any loan made to you (whether business or personal) for whatever purpose from January 1, (Year) through the date of trial.

(23) Any written report made by any expert hired by you or any agent for you, whom you propose to call as a witness.

(24) Any documents upon which you intend to rely to corroborate any allegations set forth in the [Plaintiff/Defendant]'s Answer to Complaint.

(25) All documents illustrating your payment of quarterly estimated taxes for the current tax year.

(26) Any and all documents which illustrate any perquisites received by you from any business in which you have had an interest from January 1, (Year) through the date of trial.

(27) Your Federal Form 5500, i.e., any form illustrating deferred compensation from employment or retirement plans, etc., as well as a current valuation of employee benefits.

(28) Any documents illustrating the purchase or sale of real or personal property in which you have had a direct or indirect interest from January 1, (Year) through the date of trial.

(29) All documents illustrating income earned by you from property (real or personal) in which you have had an interest, direct or indirect, from January 1, (Year) through the date of trial.

(30) All books and records maintained by the firm (Business name) illustrating income earned and expenses paid from the date of its inception through the date of trial. This should include, but not be limited to, the following items: (a) account ledgers, (b) petty cash receipts, (c) credit card receipts, (d) all canceled checks, the ledger portion for each account and monthly statements for each account.

(31) With respect to any business enterprise, including but not limited to any sole proprietorship, partnership, joint venture or corporation which you own or invested in, or in which you have or had any direct or indirect interest, either individually or with any other person, at any time since January 1, _____, please produce all ledgers, journals, balance sheets, financial statements, records and other documents showing

A. the amount of any financial contribution made by you to the establishment, acquisition and operation thereof and the source of your funds;

B. your ownership, investment and other interest therein;

C. the gross receipts of the business for each of the past four calendar years, the current year, and through the date of trial;

D. ordinary and necessary expenses of the business for each of the past four calendar years, the current year, and through the date of trial;

E. the net income of the business for each of the past four calendar years, the current year, and through the date of trial;

F. a complete itemization of the assets and the liabilities of the business;

G. the expense reimbursements or in-kind payments received by you in the course of operation of the business which reduce your personal living expenses for each of the past four calendar years, the current year, and through the date of trial;

H. business sales tax returns for each of the past four calendar years, the current year, and through the date of trial;

I. vendor bills for each of the past four calendar years, the current year, and through the date of trial;

J. business bank deposit slips for each of the past four calendar years, the current year, and through the date of trial;

K. credit card sales and deposits for each of the past four calendar years, the current year, and through the date of trial;

L. tax returns for 941s to employees for each of the past four calendar years, the current year, and through the date of trial;

M. payroll records, and names, addresses, and phone numbers of current and former employees for each of the past four calendar years, the current year, and through the date of trial;

N. monthly statements on all business bank accounts, whether checking, savings or other accounts, for each of the past four calendar years and for the current year;

O. canceled checks on all business bank accounts for each of the past four calendar years, the current year, and through the date of trial;

P. ledger portion and check book stubs on all business checking accounts for each of the past four calendar years, the current year, and through the date of trial;

(32) All receipts, ledgers or other documents, evidencing funds paid to the firm of (Business name), in cash from the date of its inception through the date of trial.

(33) Any leases signed by you from January 1, (Year) through the date of trial.

(34) All books, calendars, diaries and any similar compilations maintained by you or for you, whether for business or personal reasons, from January 1, (Year) through the date of trial.

(35) Please provide your W-4 forms from (Year) through the date of trial.

(36) Any and all documents illustrating an appraised fair market value obtained by you or any agent for you with regard to any item of real or personal property in which you claim any interest, said appraisal having been accomplished from January 1, (Year) through the date of trial.

(37) Your pay stubs for the past six (6) months.

(38) Any and all paper writings or memoranda illustrating an agreement between you and any attorney retained by you to provide services from January 1, (Year) through the date of trial.

(39) Any and all bills received by you or any agent on your behalf from any attorney hired by you, for items, including, but not limited to, suit money, costs, investigator's fees etc.

(40) Evidence of all payments made by you, or anyone on your behalf, to any attorney with whom you have worked from January 1, (Year) through the date of trial, as well as evidence of any payments made for court costs, suit money or investigator's fees.

(41) All documents illustrating each and every effort made by you, since January 1, (Year) through the date of trial, to secure gainful employment. Said documents should include, but not be limited to, information regarding dates attempts were made; the name, address and telephone number of the individual or entity to whom the inquiry was directed; position(s) applied for; salary being offered for said position(s); whether or not the position was offered, and if so, why it was refused; if the job was not offered, enumerate any reasons given as to why, etc.

(42) Please provide all documents regarding any interest you might have in any pension plan which your interest is either vested or non-vested, contributory or non-contributory interest, which documents provide the following information: corporate i.d. no., date of incorporation of the plan, corporate fiscal year of the plan, the trust document and all amendments, a copy of form 5300, 5301 or 5307, which was sent for determination, the original and last IRS determination letter, PBGC-1 form (if applicable), summary plan description, corporate resolution adopting plan/trust and any subsequent resolutions pertaining to approval, employee consensus sheet for all employees as of the most recent plan anniversary, the trust asset statement as of the most recent plan anniversary, all individual life insurance or annuity contracts in force as of the last trust anniversary, if the plan is a profit sharing or defined contribution pension plan, a listing of individual account balances as of the last valuation date, names of directors of the corporation, names of all officers of the corporation and their titles, names of shareholders of the corporation and percentage of stock owned, the latest actuarial valuation (which provides cost methods and assumptions, together with costs and liabilities for each participant in the plan), salary of the

employees for the last five (5) years on a year by year basis and any loans from the plan and, if there are, a copy of the note in support of the loan.

(43) Stock options in any corporation or entity exercised or not yet exercised.

(44) Partnership or joint venture agreements to which you are a party (beneficially or legally).

(45) 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 but not limited to auto expenses, travel expenses, personal living and entertainment expenses, life insurance, bonuses, health, accident and hospital insurance, etc.

(46) Copies of any and all personal financial statements prepared by an accountant or any other person for you or on your behalf or for any business in which you have or had an interest from January 1, (Year) through the date of trial.

(47) Any records pertaining to or which are evidence of any current outstanding indebtedness or contingent indebtedness specifically pertaining to any suits now pending or previously pending in any court whatsoever and all cases resolved without litigation or presently being negotiated.

(48) All employment records pertaining to persons employed by you from January 1, (Year) through the date of trial, which records are to include, but not be limited to, the names, addresses and telephone numbers of any such employee, the amounts paid, periodically, to each employee, the nature of the service performed by each employee, whether said employee is presently employed by you and if not, the date and circumstances under which that employee was terminated.

(49) Copies of any and all buy/out agreements in any business enterprise and/or venture which you have or have had an interest from January 1, (Year) through the date of trial.

(50) All documents supporting your claim that certain assets are not marital property.

(51) Leases and/or rental agreements for any properties in which you have an interest.

(52) Documents regarding your ownership interest in and value of all precious metals, diamonds, gems, artwork, or other similar investments which you currently own, or have an interest in or which you have owned or had an interest in from January 1, (Year) through the date of trial.

(53) A copy of any lease for the residence which you have or will occupy from January 1, (Year) through the date of trial.

(54) Documentation regarding the purchase and/or ownership of tax free investments from January 1, (Year) through the date of trial.

(55) Copies of any and all examinations of revenue agents made pursuant to any and all audits of federal and/or state income tax returns filed by you singly or jointly.

(56) Documents illustrating offers to purchase from [Plaintiff/Defendant] any asset in which the [Plaintiff/Defendant] has more than a 10% ownership interest in from January 1, (Year) through the date of trial.

(57) Your marriage certificate.

(58) Any and all hotel receipts, restaurant receipts, credit card receipts, credit card monthly statements, airline receipts, transportation receipts, canceled checks, store receipts, photographs and any other records or documents concerning or in any way relating to ***** including, without limitation, the occasions on which you have accompanied her shopping, dining or on trips, whether inside or outside the State of Maryland since the date of your marriage.

(59) Any and all hotel receipts, restaurant receipts, credit card receipts, credit card monthly statements, airline receipts, transportation receipts, canceled checks, store receipts, photographs and any other records or documents concerning or in any way relating to ***** including, without limitation, the occasions on which you have accompanied her shopping, dining or on trips, whether inside or outside the State of Maryland since the date of your marriage.

(60) Any and all notes, memoranda, cards, letters, correspondence or similar documents received by you from ***** and, or ***** since the date of your marriage.

(61) All books, calendars, diaries and any similar compilations made by you or for you which refer to or in any way related to your relationship with ***** and, or *****.

(62) Any and all records relating to the receipt by ***** of any money or gifts from you since the date of your marriage, as well as any and all records relating to any expenses of hers paid directly or indirectly by you during said period.

(63) Any and all records relating to the receipt by ***** of any money or gifts from you since the date of your marriage, as well as any and all records relating to any expenses of hers paid directly or indirectly by you during said period.

(64) All documents relating to work related child care for your minor child(ren) since _____, 200__ including, without limitation, contracts/agreements, correspondence, brochures, bills, receipts, payment records, canceled checks, and credit card statements.

(65) All documents relating to health insurance (including, without limitation, medical insurance, dental insurance, vision insurance) coverage to which you and/or your spouse and/or minor child(ren) are eligible through your employment including, without limitation, plan descriptions (including coverage benefits), your cost for coverage of yourself individually, your cost for coverage of your spouse, your cost for coverage of your child(ren).

(66) All documents evidencing the child(ren)'s extraordinary medical expenses, i.e., uninsured expenses over \$100 a year for a single illness or condition including, without limitation, uninsured, reasonable, and necessary costs for orthodontia, dental treatment, asthma treatment, physical therapy, treatment for any chronic health problem, and professional counseling or psychiatric therapy for diagnosed mental disorders, since _____, 200__.

(67) All documents relating to expenses incurred since _____, 200__ or which may need to be incurred on behalf of any child for attending a special or private elementary or secondary school to meet the particular educational needs of the child.

(68) All documents upon which you rely in support of any contention you may have that application of the child support guidelines would be unjust or inappropriate in this case.

(69) Copies of any written or recorded statements, letters, memorandums, videotapes, audio tapes, e-mails, memorandums reflecting oral conversations or other documents of or from the Plaintiff or the Defendant relevant to any issue pending in the above proceeding.

(70) All documents identified in your Answers to Interrogatories.

(71) All documents upon which you intend to rely in connection with any claims or defenses raised by you and/or the opposing party in this case.

B. The [Plaintiff/Defendant] shall make the requested inspection on (Day), (Date), at (Time) at the offices of _____. At that time the [Plaintiff/Defendant] and/or [his/her] attorneys shall peruse and copy the aforementioned documents.

By _____
(Attorney's name)
Attorney for [Plaintiff/Defendant]
(Address)
(Phone no.)

[NOTE: A LINE CERTIFYING SERVICE OF DISCOVERY MATERIAL MUST BE FILED, AND A COPY MUST BE SERVED]