

**DEFENDANTS' STANDARD REQUEST FOR PRODUCTION  
AND IDENTIFICATION OF DOCUMENTS AND THINGS TO PLAINTIFF(S)**

PROPOUNDING PARTY: Defendants

RESPONDING PARTY: Plaintiff \_\_\_\_\_

**INSTRUCTIONS**

1. YOU are requested to produce not only those writings and any indices thereto in YOUR possession, custody or control, but also those writings reasonably available to YOU, including those in the possession, custody or control of YOUR attorneys, agents, or any other person acting on YOUR behalf.
2. YOU are requested to produce all writings in the same form and order as they were kept prior to this notice to produce.
3. In the event YOU are able to produce only some of the writings called for in a particular request, please produce all writings YOU are able to produce.
4. YOUR responses must be verified under oath.

**DEFINITIONS**

1. "DOCUMENT" or "WRITING" refer to all such materials, however produced or reproduced, in your actual or constructive possession, custody, care or control; and include, but is not limited to, originals, copies, nonidentical copies, and preliminary, intermediate, and final drafts of all writings. Writing means handwriting, typewriting, printing, photostating, photographing, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof. A reference herein to any

one or more of these types of writings shall be construed to include all other types of writings without limitation.

2. "YOU" and "YOUR" refers to plaintiff(s), the allegedly injured party, his/her agents, his/her attorneys, and anyone on his/her behalf.

3. "EXPOSED PERSON" means each person whose claimed exposure to asbestos is the basis of this lawsuit.

4. As used herein, the term "MEDICAL TREATMENT FACILITY" means hospitals, dispensaries, laboratories, optometry clinics, psychological clinics, clinics of all other kinds, mental institutions, radiology laboratories, pathology laboratories, rest homes, sanitariums, convalescent homes, and all other institutions, organizations, and facilities wherein are practiced the healing arts.

5. As used herein, the term "MEDICAL PRACTITIONER" refers to all physicians, osteopaths, dentists, chiropractors, nurses, psychiatrists, psychologists, optometrists, physical therapists, hospice practitioners and all other persons practicing, or purporting to practice, the healing arts.

#### **WRITINGS AND OTHER TANGIBLE ITEMS REQUESTED**

1. All DOCUMENTS and WRITINGS (including photographs) concerning, illustrating, showing or describing any raw asbestos or materials or products containing asbestos that the plaintiff or EXPOSED PERSON allegedly used or to which the EXPOSED PERSON was allegedly exposed.

2. All DOCUMENTS in plaintiff's possession or under plaintiff's control that identify the retail and wholesale suppliers of the alleged asbestos-containing materials that caused the claimed injuries.

3. All DOCUMENTS and WRITINGS allegedly concerning, proving or indicating how the EXPOSED PERSON allegedly used the asbestos products and how the EXPOSED PERSON was allegedly exposed to the asbestos products.
4. All DOCUMENTS AND WRITINGS concerning or constituting communications (written or verbal) to or from any labor union concerning asbestos.
5. All DOCUMENTS and WRITINGS substantiating an income loss or damages due to the EXPOSED PERSON'S physical condition, including W-2 forms, wage statements, Social Security records, workers' compensation files, and documentation of retirement and/or pension plans.
6. All containers (*e.g.*, boxes, cans, buckets, sacks, etc.) collected by, under the control or in the possession of the plaintiff evidencing or containing any raw asbestos or materials or products containing asbestos to which the EXPOSED PERSON claims to have been exposed.
7. Samples of all raw asbestos or materials or products containing asbestos to which the EXPOSED PERSON claims to have been exposed.
8. All DOCUMENTS and WRITINGS showing the names of employers, locations and jobs that the EXPOSED PERSON worked on, including any personal diaries, work diaries and photographs.
9. All DOCUMENTS and WRITINGS (*e.g.*, articles, papers and/or notes) collected by, under the control of, or in the possession of plaintiff that concern health hazards associated with asbestos materials.
10. Copies of all medical bills incurred due to the EXPOSED PERSON'S alleged medical condition(s) that are the subject of this lawsuit.

11. All DOCUMENTS and WRITINGS representing, recording or referring to any disability pension or disability insurance benefits received by the EXPOSED PERSON or claims/applications by the EXPOSED PERSON for such benefits.

12. All transcripts of testimony and statements under oath by plaintiff or the EXPOSED PERSON relating to the physical condition of plaintiff or the EXPOSED PERSON.

13. All DOCUMENTS and WRITINGS arising out of any employment of the EXPOSED PERSON at which the EXPOSED PERSON claims asbestos exposure, including but not limited to personnel files, physical examinations, medical clearances and performance reviews.

14. (For the spouse of the EXPOSED PERSON only) marriage certificate(s) of the spouse of the EXPOSED PERSON in a loss of consortium action.

15. All DOCUMENTS and WRITINGS collected by, under the control of, or in the possession of plaintiff that identify the retail and wholesale suppliers of the alleged asbestos-containing materials that caused the claimed injuries.

16. If the EXPOSED PERSON is or was a proprietor of a business involving sale, use or distribution of asbestos-containing friction products or building materials, provide with respect to said business all purchase orders, purchase receipts, bills of lading, shipping and/or receiving documents, invoices or bills relating to the purchase, sale or use of any asbestos-containing products in the business, canceled checks, check registers, accounts payable ledgers, accounts receivable ledgers, general ledgers, accounting books and papers relating to the business, architectural specifications, books, product brochures or other literature, manuals, catalogs, price lists, reference guides,

books or other papers received from suppliers or manufacturers relating to asbestos-containing products, packages or containers of asbestos-containing products.

**ATTACH THE FOLLOWING DOCUMENT TO YOUR RESPONSES:**

**[Verification under penalty of perjury]**