

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

_____ , Plaintiff,	Case No.: _____
v.	
_____ , Defendant.	

**PLAINTIFF’S RESPONSE TO DEFENDANT’S REQUEST FOR
PRODUCTION OF DOCUMENTS AND NOTICE TO PRODUCE**

My name is _____, and I am the Plaintiff in the above styled case, and I respond to Defendant’s Request for Production of Documents and Notice to Produce as follows:

GENERAL OBJECTIONS

1. Plaintiff objects to each request to the extent that it purports to require the release of information which is protected by the attorney-client privilege, the attorney work product doctrine, is prepared in anticipation of litigation or trial by or for a party of for that party’s representative, or is otherwise protected by any other discovery privilege recognized under the Federal Rules of Civil Procedure or the laws of the State of Georgia.
2. Plaintiff objects to each request to the extent that it purports to require the release of information which is protected by the attorney-client privilege, the attorney work product doctrine, is prepared in anticipation of litigation or trial by or for a party of for that party’s representative, or is otherwise protected by any other discovery privilege recognized under the Georgia Civil Practice Act or the laws of the State of Georgia.
3. Plaintiff objects to each request to the extent that it purports to impose a duty or

obligation upon Plaintiff that is not imposed by the Georgia Civil Practice Act.

4. Plaintiff objects to each request to the extent that it purports to require Plaintiff to identify each document which is responsive to a request when documents are produced as they are kept in the ordinary course of business. Such a requirement is unduly burdensome, and Plaintiff may not impose that requirement pursuant to the Georgia Civil Practice Act.
5. Plaintiff objects to each request to the extent it requires Plaintiff to provide information that may be obtained by Defendant from another source that is more convenient, less expensive, or less burdensome.
6. Plaintiff objects to each request to the extent that it is vague, ambiguous, overly broad, unduly burdensome, oppressive, or impossible to answer fully.
7. Plaintiff objects to each request to the extent that it seeks information that is confidential or which is not relevant to the subject matter involved in the pending action and is not reasonably calculated to lead to the discovery of admissible evidence.
8. Plaintiff objects to each request to the extent that it seeks confidential, proprietary, or trade secrets information from Plaintiff.
9. Plaintiff objects to each request to the extent that the information sought is the subject of continuing investigation by Plaintiff.
10. Plaintiff objects to each request to the extent that it seeks information that is protected by patient confidentiality, Peer Review Privilege, O.C.G.A. § 31-7-133, or the Medical Review Committee Privilege, O.C.G.A. § 31-7-143.
11. Plaintiff objects to each request to the extent that it calls for the disclosure of information outside the scope of the time, place, subject matter, and circumstances of the occurrences mentioned or complained of in the Complaint.
12. Plaintiff objects to each request to the extent that Defendant does not describe the documents to be produced by item or category and that each item or category to be produced, to the extent any item or category of documents is described, is not described

with reasonable particularity.

WITHOUT WAIVING THE FOREGOING, PLAINTIFF RESPONDS AS FOLLOWS:

1. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

2. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

3. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

4. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

5. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant

OBJECTION# _____ listed above applies to this request

6. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

7. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

8. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Defendant's possession
 The requested documents exist, but are not in Defendant's custody and are not reasonably available to the Defendant
 OBJECTION# _____ listed above applies to this request

Additional Responses are attached on a separate sheet.

Dated: _____

Plaintiff, Pro se *[Signature]*

Name: _____

Address: _____

Phone: _____

Email: _____

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Case No.: _____

VERIFICATION

My name is _____. I hereby swear or affirm, before a notary public that the *Plaintiff's Responses to Defendant's Request for Production of Documents and Notice to Produce* are complete, true and correct.

Dated: _____

Plaintiff, Pro se [Signature]

Name: _____

Address: _____

Phone: _____

Email: _____

Subscribed and sworn before me on
_____, 20__.

Notary Public

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CERTIFICATE OF SERVICE OF DISCOVERY

This will certify that Plaintiff has today served upon Defendant *Plaintiff's Response to Defendant's Request for Production of Documents and Notice to Produce* by sending via US Mail, postage prepaid, addressed as follows:

Dated: _____

Plaintiff, Pro se [Signature]

Name: _____

Address: _____

Phone: _____

Email: _____

HOW TO FILE YOUR DISCOVERY RESPONSES

Important

Any document you file with the Clerk of the Court becomes public record that can be accessed by anyone. **ONLY file proof of service and your notarized verification when responding to discovery.**

1. Double check you have signed and dated your responses.
 2. Make 1 copy of your responses for your own records.
 3. File the original VERIFICATION and CERTIFICATE OF SERVICE with the Clerk of Superior Court. Ask for a copy showing the date stamp.
 4. Mail your original responses and a the date-stamped copy of the Verification and Certificate of Service to the opposing party's attorney, or to the Plaintiff if he/she is representing themselves.
- It is recommended you send discovery to the opposing party via United States Certified Mail, return receipt requested. However, you can send it via regular First Class mail.