

SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Plaintiff,		Civil Action
v.		File No.: _____
Defendant.		

**REQUEST FOR PRODUCTION OF DOCUMENTS
AND NOTICE TO PRODUCE**

TO: _____
First Name, Last Name of Opposing Party/Attorney

Opposing Party's Address/Attorney's Address

City, State ZIP

You are requested pursuant to O.C.G.A. § 9-11-34 to produce the documents indicated below for inspection and copying by the Plaintiff Defendant, at

Name of Person Completing this Request

Address

City, State ZIP

within 30 days from the date of this request.

You are further requested pursuant to O.C.G.A. § 24-13-27 to produce these documents at any deposition, mediation session, hearing or trial in this case.

1.

All check stubs, statements of earnings, W-2 forms, 1099 forms, K-1 forms, and any other documents given to you by your employer or any other person, partnership, corporation, or other entity showing your income from any source from _____(date) until the date of trial in this case.

2.

- (a) All income tax returns filed by you, individually and/or jointly with any other person or persons, with Federal and State governments from _____(date) until the date of trial in this case.
- (b) All W-4 forms which you have submitted to your employer from _____(date) until the date of trial in this case; if none, produce a statement from your employer indicating the number of withholding exemptions which you are declaring for Federal and State income tax purposes.
- (c) All declarations of estimated tax filed by you with the Federal and State government from _____(date) until the date of trial in this case.

3.

All records of checking accounts, savings accounts, cash management accounts, certificates of deposit, investment and money market accounts, maintained by you, individually and/or jointly with others, or maintained by you as trustee or custodian for any other person or persons, including but not limited to monthly statements, cancelled checks, deposit slips, check registers, passbooks and any other records from _____(date) until the date of trial in this case.

4.

All records and other tangible evidence relating to any profit-sharing plan, pension plans, Keogh plans, Individual Retirement Accounts, stock ownership plans, 401(k) plans, and any other deferred compensation or retirement plans of any nature in which you have any interest from _____(date) until the date of trial in this case, including but not limited to the following:

- (a) Any quarterly, semi-annual, and annual statements of your interest and account as participant of any such plan;
- (b) Any forms of the Form 5500 Series (Annual Return/Report of Employee Benefit Plan) filed by the trustee or administrator of such plan with the Internal Revenue Service for the last two years;
- (c) Any Summary Plan Description or similar document containing the terms and conditions under which the plan is maintained;
- (d) Any statements showing the assets held in, or purchased or sold by, each of the plans in which you have an interest or account and the value of these assets as of the most recent valuation date;
- (e) Any documents reflecting the present beneficiaries of your interest in any and all such plans.

5.

- (a) All warranty deeds, quitclaim deeds, and deeds to secure debt which name you as grantor, individually and or jointly with any other person or persons, relating to property in which you have any interest or equity.
- (b) All closing statements, contracts of sale, or other documents relating to your

purchase or sale of any interest in real property from January 1, 2008 until the date of trial in this case.

- (c) Any and all real estate leases or lease/purchase agreements showing you as lessor or lessee.
- (d) Any real estate option agreements of which you are a party.

6.

- (a) All automobile tag registration certificates and automobile title certificates naming you or your spouse, individually and/or jointly with any other person or persons, as owner from January 1, 2008 until the date of trial in this case.
- (b) All notices or other documents relating to any insurance coverage for said automobiles.
- (c) All automobile leases or lease purchase agreements of which you are a lessor or lessee.

7.

All medical and/or dental insurance policies and booklets insuring you, individually and/or jointly with any other person or persons, as well as all premium notices and correspondence received by you in the last year in connection with the same.

8.

All life insurance policies and certificates on your life, as well as all premium notices, forms, and other correspondence between any insurance company or agent and you relating to any life insurance of which you are the owner and/or the insured.

9.

All notes, installment obligations, lines of credit, home equity loans, and other obligations of any nature whatsoever of which you are currently an obligor, individually and/or jointly with any other person or persons. If there are monthly statements relating to any loan account, please produce these records from _____(date) until the date of trial in this case.

10.

All monthly credit and charge statements and receipts showing all charges and payments made and the balance due on any credit cards or charge accounts maintained by you or regularly used by you, including but not limited to, any accounts maintained in your name, the name of your spouse, the names of your spouse and yourself together, or in the name of your employer or any other person or entity from _____(date) until the date of trial in this case.

11.

All documents showing financial support you have provided for the minor child(ren)'s, _____(Names of Children), from _____(date) until the date of trial in this case.

12.

A completed Domestic Relations Financial Affidavit in accordance with Uniform Superior Court Rule 24.2.

13.

Any or all photographs, letters, statements, recordings, documents or other tangible evidence that support you or your spouse's position on the issues of custody, visitation, child support, alimony and division of property.

Dated: _____

_____ Petitioner/Plaintiff Respondent/Defendant *Pro se*

Name: _____

Address: _____

City, State ZIP

Phone: _____

Email: _____

SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

Plaintiff,

v.

Civil Action

File No.:

Defendant.

CERTIFICATE OF SERVICE OF DISCOVERY MATERIALS

This certifies that I served the opposing party attorney for the opposing party with a copy of the foregoing *Request for Production of Documents and Notice to Produce* by depositing the same in the United States Mail with adequate postage, addressed as follows:

First Name, Last Name of Opposing Party/Attorney

Opposing Party's Address/Attorney's Address

City, State ZIP

Dated: _____

Plaintiff Defendant *Pro se*

Name: _____

Address: _____

City, State ZIP

Phone: _____

Email: _____

HOW TO FILE THIS DISCOVERY REQUEST

- 1. Make 2 copies of this completed form.

- 2. File the original request with the Clerk of Superior Court.

- 3. Mail one copy to the opposing party's attorney or directly to the opposing party if they are not represented by an attorney. The other copy is for your records.
 - It is recommended you send the request via United States Certified Mail, Return Receipt requested. However, you can also send this request by regular First Class mail.