

## HOW TO RESPOND TO REQUESTS FOR PRODUCTION OF DOCUMENTS

- Requests for Production of Documents are a list of documents you must allow the other party or their attorney to inspect.
- Requests for Production of Documents are part of “Discovery,” which is very common in court cases. If you are served with discovery, such as a Request for Production of Documents, you are required to respond by the deadline. If you do not respond, the judge in your case will probably order you to respond. The judge may also require you to pay the other side’s attorney fees or even hold you in contempt of court if you continue to refuse to respond to discovery.
- You are required to produce all documents you have or that you can easily get. For example, you may not have copies of your bank statements on hand, but you could easily log onto your online account and download them or print them.
- You may not be able to answer all of the Requests for Production of Documents because you do not have what the other side is asking for. If you do not have a document, do not just leave the response blank or write “N/A.” Doing that may cause the other party or the judge to think you are refusing to answer. Instead, explain why you cannot answer. For example:

Q: Produce all of your health insurance policies.

A: I do not have a health insurance policy.

Q: Produce a copy of your tax returns for the past 5 years.

A: I did not file taxes last year but I am producing my tax returns for the prior 4 years.
- Sometimes a Request asks for a document that includes very sensitive information, such as a password, a Social Security Number, or private medical information. If you have a concern about providing a response with sensitive information you will need to file a request for the judge to review the Request and provide you and the other party with instructions about how to protect your sensitive information.
- You are not required to make copies to provide to the other party or their attorney. You may choose to do that, or to provide electronic copies of your documents, or make arrangements for the other party or their attorney to copy your documents at their own expense, or just to review your documents.
- Finally, DO NOT file your answers to discovery. You should make a copy of all of your answers for your records and send your original response to the other party, or their attorney if they are represented. The only thing you should file is a Certificate of Service stating the date you sent the other party your responses.

IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

\_\_\_\_\_

Plaintiff,

v.

\_\_\_\_\_

Defendant.

CIVIL ACTION  
FILE NUMBER: \_\_\_\_\_

**RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS**

My name is \_\_\_\_\_, and I am the Plaintiff/Defendant in the above-styled action. I respond to the Request for Production of Documents served on me as follows:

**GENERAL OBJECTIONS**

- A. I object 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.
- B. I object to each request to the extent that it purports to impose a duty or obligation upon I that is not imposed by the Georgia Civil Practice Act.
- C. I object to each request to the extent that it purports to require me to identify each document that 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 the other party may not impose that requirement pursuant to the Georgia Civil

Practice Act.

- D. I object to each request to the extent it requires me to provide information that may be obtained by the other party from another source that is more convenient, less expensive, or less burdensome.
- E. I object to each request to the extent that it is vague, ambiguous, overly broad, unduly burdensome, oppressive, or impossible to answer fully.
- F. I object 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.
- G. I object to each request to the extent that it seeks confidential, proprietary, or trade secrets information from me.
- H. I object to each request to the extent that the information sought is the subject of continuing investigation.
- I. I object 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.
- J. I object 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 or Counterclaim against me.

K. I object to each request to the extent that the other party 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 THESE DEFENSES, I RESPOND AS FOLLOWS:**

1.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
- The requested documents exist but I cannot produce them because \_\_\_\_\_  
\_\_\_\_\_
- The requested documents do not exist.

2.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
- The requested documents exist but I cannot produce them because \_\_\_\_\_  
\_\_\_\_\_
- The requested documents do not exist.

3.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

4.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

5.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

6.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

7.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
- The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

8.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
- The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

9.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
- The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

10.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

11.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

12.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

13.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

14.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

15.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

16.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 

- The requested documents do not exist.

17.

- I am producing all of the requested documents that exist.
- I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).



The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

18.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

19.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

20.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

---

The requested documents do not exist.

21.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 
- The requested documents do not exist.

22.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 
- The requested documents do not exist.

23.

- I am producing all of the requested documents that exist.
  - I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).
  - The requested documents exist but I cannot produce them because \_\_\_\_\_
- 
- The requested documents do not exist.

24.

- I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

25.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

26.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

---

The requested documents do not exist.

27.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

28.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

29.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

30.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

31.

I am producing all of the requested documents that exist.

I am producing all of the requested documents in my possession. I have requested copies of additional documents and expect to produce them by \_\_\_\_\_ (date).

The requested documents exist but I cannot produce them because \_\_\_\_\_

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The requested documents do not exist.

Dated this \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

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*Signature*

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*Print Name*

Address/Phone/Email:

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IN THE SUPERIOR COURT OF GWINNETT COUNTY  
STATE OF GEORGIA

\_\_\_\_\_

Plaintiff,

v.

\_\_\_\_\_

Defendant.

CIVIL ACTION  
FILE NUMBER: \_\_\_\_\_

**CERTIFICATE OF SERVICE OF DISCOVERY**

On \_\_\_\_\_ (date) I sent my Response to  
Request for Production of Documents to the other party. It was addressed as follows:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\_\_\_\_\_  
*Signature*

\_\_\_\_\_  
*Print Name*

Address/Phone/Email:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_