

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

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

**DEFENDANT’S RESPONSE TO PETITIONER’S FIRST NOTICE TO
PRODUCE and REQUEST FOR PRODUCTION OF DOCUMENTS**

My name is _____, and I am the Respondent in the above styled case, and responds to Petitioners’ requests as follows:

GENERAL OBJECTIONS

1. Respondent 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. Respondent 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. Respondent objects to each request to the extent that it purports to impose a duty or obligation upon Respondent that is not imposed by the Georgia Civil Practice Act.

4. Respondent objects to each request to the extent that it purports to require Respondent 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 Respondent may not impose that requirement pursuant to the Georgia Civil Practice Act.
5. Respondent objects to each request to the extent it requires Respondent to provide information that may be obtained by Petitioner from another source that is more convenient, less expensive, or less burdensome.
6. Respondent objects to each request to the extent that it is vague, ambiguous, overly broad, unduly burdensome, oppressive, or impossible to answer fully.
7. Respondent 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. Respondent objects to each request to the extent that it seeks confidential, proprietary, or trade secrets information from Respondent.
9. Respondent objects to each request to the extent that the information sought is the subject of continuing investigation by Respondent.
10. Respondent 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. Respondent 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. Respondent objects to each request to the extent that Petitioner 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, RESPONDENT RESPONDS AS FOLLOWS:

1. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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 Petitioner'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 Petitioner'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 Petitioner'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 Petitioner'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 Petitioner'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 Petitioner'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 Petitioner'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
9. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
10. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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

11. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
12. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
13. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
14. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
15. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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

16. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
17. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
18. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
19. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
20. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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

21. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
22. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
23. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
24. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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
25. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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

26. Provided as requested Not Applicable Will supplement later before trial
 Requested document is already in the Petitioner'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: _____

Respondent, Pro se *[Signature]*

Name: _____

Address: _____

Phone: _____

Email: _____

IN THE SUPERIOR COURT OF GWINNETT COUNTY
STATE OF GEORGIA

_____,
Plaintiff,
v.
_____,
Defendant.

Case No.: _____

VERIFICATION

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

Dated: _____

Respondent, Pro se [Signature]

Name: _____

Address: _____

Phone: _____

Email: _____

Subscribed and sworn before me on
_____, 20__.

Notary Public

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v.	
_____ , Defendant.	

CERTIFICATE OF SERVICE OF DISCOVERY

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

Dated: _____

Respondent, 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.