

STATE OF MINNESOTA
COUNTY OF HENNEPIN

FRANKIE PLOWER,
Plaintiff,

v.

MILDRED DANDERDORF,
Defendant.

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Case Type: Contract

Court File No.: xx-CV-xx-xxx

**DEFENDANT MILDRED
DANDERDORF'S REQUEST FOR
PRODUCTION TO
PLAINTIFF FRANKIE PLOWER**

REQUEST FOR PRODUCTION

PLEASE TAKE NOTICE that Pursuant to Rule 26 and Rule 34 of the Minnesota Rules of Civil Procedure, Defendant, Mildred Danderdorf, hereby requests that within thirty (30) days after service of this Request, Plaintiff Frankie Plover produce and permit Defendant to inspect and copy, all of the following documents and things at the office of its attorneys, LEGALLANDING LAW OFFICES, within the time period established under Rule 34.02.

PURSUANT TO RULE 34.01 OF THE MINNESOTA RULES OF CIVIL PROCEDURE, YOU ARE HEREBY REQUIRED TO PRODUCE THE DOCUMENTS AND TANGIBLE THINGS REQUESTED HEREIN WHICH ARE IN YOUR POSSESSION, CUSTODY, OR CONTROL. PURSUANT TO THE RULE, EVEN THOUGH YOU MAY NOT HAVE ACTUAL POSSESSION OF THE DOCUMENTS OR TANGIBLE THINGS, WITHIN THE SCOPE OF RULE 26.02 YOU MUST NONETHELESS DELIVER THESE MATERIALS IF YOU HAVE CONTROL OVER THEM IN THE SENSE THAT YOU MAY OBTAIN POSSESSION UPON REQUEST FROM A GOVERNMENT AGENCY OR A SUBSIDIARY OR AGENT, SUCH AS AN ATTORNEY.

The following production request, if a duplicate of any previous request to produce, is intentional and meant to be an up-date of the previous production responses made:

1. All documents in your possession which relate to the injuries you allege in your complaint, including but not limited to doctor's notes, hospital records, nurse's notes, x-ray reports, physical therapy records, bills or invoices setting forth the cost of treatments, or any other documents of any kind.
2. The statement of any other witnesses, except parties to this action, non-treating experts and drivers or other participants who may yet be sued because of the occurrence alleged.
3. Any and all data as to the physical or mental condition of the Plaintiff and Defendant, Abby Warner, prior and subsequent to the occurrence alleged by the Plaintiff and any other physical objects involved at the scene of the alleged occurrence.
4. Any and all statements obtained from any individuals relating to Plaintiff's ability or inability to attend school and/or perform physical activities.
5. All photographs, videotapes, diagrams, or other graphic representations of the scene of the incident you allege in your complaint.
6. All photographs, videotapes, diagrams, or other graphic representations of the injuries you allege in your complaint.
7. All documents, exhibits, papers or any other tangible evidence not previously produced which the Defendant intends to introduce into evidence or to use at Trial.
8. An official copy of your academic transcript from the law school you were enrolled at on the date of the occurrence subject to this lawsuit.
9. Any and all motorcycle repair estimates and repair receipts pertaining to any motor vehicle involved in the subject occurrence.

10. All insurance policies that may be applicable to the subject occurrence including declaration pages.
11. Any documentation bearing on Plaintiff's credibility, integrity, honesty, reputation or character, including but not limited to, arrest records, police reports, tickets, records of conviction, credit reports, complaints at law filed by or against Plaintiff, and the like.
12. An affidavit of the representing party's attorney stating that the production and response to this Request is complete and whether production responses to prior requests to produce in this action are complete.

Date: July ____, 2010

Mildred Danderdorf
Respectfully Submitted By Her Attorney,

By: _____
L.L. Esquiremo
Attorney #xxxxxx
LegalLanding Law Offices
1050 East Law Boulevard
Minneapolis, MN 55402
(612) xxx-xxxx

ATTORNEYS FOR DEFENDANT

Certificate of Service

I hereby certify that a true copy of this document was sent, postage prepaid, to Slickson & Portman, 19 East Legal Way, Minneapolis, Minnesota 55402 on the __ day of July, 2010:
