

Commonwealth of Massachusetts
THE TRIAL COURT
PROBATE AND FAMILY COURT DEPARTMENT

PLYMOUTH, SS.

PROBATE AND FAMILY COURT
DOCKET NO. PL XXXXXXXXX

JANE DOE,)
 Plaintiff)
))
VS.)
))
JOHN DOE,)
 Defendant)

DEFENDANT’S REQUEST FOR PRODUCTION OF DOCUMENTS

NOW COMES Defendant, JOHN DOE in the above-captioned matter and, in accordance with the provisions of Mass. R. Dom. Rel. P. 34, requests that Plaintiff furnish Defendant’s Attorney with the documents hereinafter described **by [DATE], or earlier**, and permit Defendant’s Attorney to inspect and to copy such documents as may be desired (or provided Defendant’s Attorney with copies of such documents).

This request is intended to cover all records and documents in the possession of Plaintiff or subject to Plaintiff’s custody and control, whether they are located at Plaintiff’s place of residence, any principal or secondary business office, or within the possession of any other person or organization and being subject to Plaintiff’s custody and control.

As used in this request, the terms “documents” and “records” shall mean the original, all copies and drafts of writings of any kind, including, and without limiting the generality of the foregoing, correspondence, memoranda, reports, notes, letters, messages (including reports, notes and memoranda of telephone conversations and conferences), calendar and diary entries, contracts, records, data, agreements, checks and cancelled checks, check registers, bank statements, brokerage account statements or other writings and printed materials specifically referred to in the following numbered requests. The terms shall also apply to any information requested which is recorded within or upon any computer, computer disk, computer printout, tape, data sheet or data processing card, and shall likewise include any other written, recorded, transcribed, punched, taped, filmed or graphic matter.

DOCUMENTS AND RECORDS REQUESTED

1. All checking and savings account statements for accounts in your name or for which you have access to from January 1, 2009 to the present.

2. All investment account statements for accounts in your name or for which you have access to from January 1, 2015 to the present.

The Responding Party (i.e. Plaintiff herein) is to produce the above-described documents at the Law Offices of XXXX, at [Address], on or before [DATE, at least 33 days from the date served by mail].

Dated: _____

Respectfully submitted
John Doe,
By His Attorney,

XXX, Esq.
Law Firm
Address 1
Address 2
(617) XXX-XXXX
BBO # _____