

COMMONWEALTH OF MASSACHUSETTS

BRISTOL, ss.

PROBATE & FAMILY COURT  
Docket No: BR15D0000DR

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

**DEFENDANT JOHN DOE'S RESPONSE TO PLAINTIFF JANE DOE'S FIRST  
REQUEST FOR PRODUCTION OF DOCUMENTS**

**GENERAL QUALIFICATIONS**

It should be noted that JOHN DOE (hereinafter referred to as "Responding Party" or "Defendant") has not fully completed his discovery in this action and has not completed his preparation for trial. All of the responses contained herein are based only upon such information and documents, which are presently available and specifically known to Responding Party and disclose only those contentions, which presently occur to Responding Party. It is anticipated that further discovery, legal research and analysis will supply additional facts, add meaning to known facts, and establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in, and variations from the contentions herein set forth. The following answers to discovery demands are given without prejudice to Responding Party's right to produce evidence of any subsequently discovered fact or facts which Responding Party may later recall or documents subsequently located by Responding Party. Responding Party accordingly reserves the right to change any and all responses herein as additional facts are ascertained, analysis made, legal research is completed and contentions are made. The responses contained herein are made in a good faith effort to supply the information presently known by Responding Party based on as much factual information and specification of legal contentions as is presently known, but should in no way be to the prejudice of Responding Party in relation to other discovery, research or analysis.

These introductory comments shall apply to each and every answer given herein and shall be incorporated by reference as though fully set forth in all of the responses appearing in the following pages.

Moreover, Responding Party does not have a duty under Mass.R.Dom.Rel.P. 26(e) to supplement answers given herein, with limited exception as described in said Rule. Responding Party reserves all rights to amend or supplement these responses. Discovery is ongoing.

**REQUEST NO. 1:** All checking and savings account statements in your name from January 1, 2005 to the present.

**RESPONSE: *Objection.*** The request calls for information not reasonably calculated to lead to the discovery of admissible evidence. The request is vague and ambiguous. The request is burdensome and oppressive. The request is irrelevant to the underlying nature of this proceeding. Notwithstanding said objections, Responding Party answers as follows:

-See documents attached as **Response No. 1.**

**REQUEST NO. 2:** All business licenses currently standing in your name or for any entity for which you have any ownership interest.

**RESPONSE: *Objection.*** The request calls for information not reasonably calculated to lead to the discovery of admissible evidence. The request is burdensome and oppressive. The information is equally available to the Requesting Party. Notwithstanding said objections, Responding Party answers as follows:

-See documents attached as **Response No. 2.**

Dated: \_\_\_\_\_

Respectfully submitted  
John Doe,  
By His Attorney,

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

#### VERIFICATION

I, JOHN DOE, hereby declare under the pains and penalties of perjury that the foregoing responses to demand for documents is true and accurate.

Dated: \_\_\_\_\_

\_\_\_\_\_  
JOHN DOE