

**SAMPLE DOCUMENTS: Discovery**

Interrogatories are written questions directed to the opposing party that the opposing party must answer in writing and under oath. Requests for Production of Documents are requests directed to the opposing party to produce particular documents or types of documents that are relevant to your case.

**Sample Interrogatories (Breach of Contract)**

STATE OF \_\_\_\_\_ COUNTY OF \_\_\_\_\_ CASE TYPE: Contract

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\_\_\_\_\_  
Plaintiff,

v.

**INTERROGATORIES**

\_\_\_\_\_  
Defendant.

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TO: \_\_\_\_\_

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Pursuant to Rules 26 and 34 of the \_\_\_\_\_ Rules of Civil Procedure, you are hereby requested to respond under oath to the following Interrogatories within thirty days from the date of service of these Interrogatories upon you:

1. State the name and address of each person whom you believe has knowledge of facts material to the issues raised in the Complaint, Answer and Counterclaim in the above-entitled action.

2. State the name and address of each person whom you may call as a witness to testify at the trial of the above-entitled action.

3. Identify all documents that you believe support the allegations contained in the Complaint, Answer and Counterclaim.

4. Identify all documents that you intend or expect to introduce at the trial of this matter.

5. Describe in detail all facts supporting the claims contained in the Complaint, Answer and Counterclaim.

6. Identify all individuals who assisted in the preparation of the answers to these Interrogatories.

7. Identify all individuals who assisted in the preparation of your responses to \_\_\_\_\_'s Requests for the Production of Documents.

8. Identify all documents that you reviewed and/or relied upon to assist you in preparing the answers to these Interrogatories.

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

**Sample Request for Production of Documents (Breach of Contract)**

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

CASE TYPE:  
Contract

\_\_\_\_\_

\_\_\_\_\_  
Plaintiff,

v.

**REQUESTS FOR  
PRODUCTION OF  
DOCUMENTS**

\_\_\_\_\_  
Defendant.

\_\_\_\_\_

TO: \_\_\_\_\_

\_\_\_\_\_

Pursuant to Rules 26 and 34 of the \_\_\_\_\_ Rules of Civil Procedure, \_\_\_\_\_  
requests that within thirty days from the date of service of these Requests for Production  
of Documents, you produce for inspection and copying at

\_\_\_\_\_

\_\_\_\_\_, the following documents:

1. All documents pertaining to or arising out of the relationship between Plaintiff and Defendant.
2. All documents containing facts or information about any of the allegations and claims contained in the Complaint, Answer and Counterclaim.
3. Every document that you intend to introduce at the trial of this matter.

4. Every document containing statements made by parties or nonparties concerning this lawsuit or its subject matter.

5. Every document identified in your Answers to \_\_\_\_\_'s Interrogatories.

Dated:

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