
VS

AND _____

: _____ JUDICIAL DISTRICT COURT

: PARISH OF _____, LOUISIANA

: DOCKET NO. _____

ANSWER TO SECOND REQUEST FOR PRODUCTION OF DOCUMENTS

NOW INTO COURT, through undersigned counsel, comes _____, Plaintiff,
and for answer to the Defendants= Second Request for Production of Documents, says:

1.

REQUEST FOR PRODUCTION NO. 23:

Plaintiff=s state and federal income tax returns for 20____, with attachments such as W-2
and Form 1099.

See attached.

2.

REQUEST FOR PRODUCTION NO. 24:

Please produce any and all of your credit reports, or documents reflecting your credit
reports, or documents reflecting your credit history or experience, obtained by you from _____
____ 20____, through the present.

See attached.

3.

REQUEST FOR PRODUCTION NO. 25:

Please produce a copy of any and all doctor=s notes you tendered to _____
to justify your absence from work at any time in 20____ and 20____.

None.

4.

REQUEST FOR PRODUCTION NO. 26:

Please produce any witness statements taken by you in connection with this action.

None.

5.

REQUEST FOR PRODUCTION NO. 27:

Answering Request For Production Of Documents

Edmund Robert Daniell



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