

IN THE _____

JANE DOE	:	
	:	
Plaintiff	:	CASE NO.:
	:	
v.	:	
	:	
WASHINGTON METROPOLITAN	:	
AREA TRANSIT AUTHORITY	:	
	:	
Defendant	:	

**PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT WASHINGTON METRAPOLITAN AREA TRANSIT AUTHORITY**

COMES NOW, Plaintiff, Jane Doe, pursuant to MD Rules, Rule 2-422 requests that the following documents and tangible things be made available for inspection and copying by Plaintiff’s counsel within thirty (30) days to (LOCATION OF DOCUMENT PRODUCTION) or at such time and place as may be agreed.

To the extend the Defendant wishes to assert any objections or privilege to the production, inspection or copying of any documents sought herein, the Defendant is required to state for each such documents; the name or title of the document, the date it was prepared, the author and all recipients of the document, the objection or privilege asserted, and the facts sufficient to permit the Court to rule upon the asserted objection or privilege should such a ruling be requested. If you contend that any documents, writings or statements are privileged, set forth in each instance the rule of law and the specific facts giving use to the privilege and whether any non-privileged information is contained in each said document or writing.

If all copies of a particular document or tangible thing have been destroyed the Defendant is required to state the reason for the destruction, the date of the destruction and the identity of the person or persons authorizing the destruction.

Without limiting Defendant's obligation to respond in a timely manner to this request and to produce documents hereunder, Defendant is required to supplement his response and production.

DEFINITIONS AND INSTRUCTIONS

The following definitions apply with respect to these Requests and to any further or future requests for documents submitted by Plaintiff to Defendant.

- A. Each of these Requests is deemed to be continuing in nature. In the event that any alter date or time you obtain any additional facts, obtain or make any assumptions, or reach any conclusions, opinions or contentions that are different from or in addition to those set forth in the response to the Requests, in accordance with the request, the Plaintiff demands Defendant to supplement the response to the Requests promptly and sufficiently to set forth fully such different names of persons, facts, assumptions, conclusions, opinions and contentions, all pursuant to Rule _____ of the MD Rules.
- B. As used herein, "you" or "Defendant" shall refer to WASHINGTON METRAPOLITAN AREA TRANSIT AUTHORITY, ("WMATA"), Defendant in the above-styled action, and all of its representatives, agents and attorneys.

- C. As used herein, “Plaintiff” shall refer to JANE DOE, Plaintiff in the above-styled action, and all of her representatives, agents and attorneys.
- D. As used herein, the words “Document” or “Documents” shall mean all those items including, without limitations: originals, copies, drafts and final versions of agreements, contracts, offers, proposals, correspondence, letters, telegrams, office communications, memoranda, reports, records, recordings, or transcripts thereof, facsimiles, schedules, tests, studies, labels, samples, notes, notebooks, diaries, appointment books, photographs, photocopies charts, descriptions, invoices, purchase orders, bills, acknowledgments, videotapes, publications, transcripts, computer inputs, outputs, reports, written notes and transcripts of telephone conversations, written notes of other conversations, and any other retrievable data in Defendant’s possession, custody or control, wherever located, including personal or working files of offices, agents, or employees of Defendant, however produced or reproduced.
- E. The words “identify” or “identity”, when used in reference to a person, means that you are being asked to state the person’s full name, last known address and telephone number, last known job title and business affiliation, and job title and business affiliation at the time of the accident alleged in the complaint. When used in reference to a document, the words “identify” or “identity” means that you are being asked to state the type of the document, its date and author and its present location and custodian. If any documents being identified is no longer within your possession or under your control, please state what happened to it.

F. The term “occurrence” means the incident and/or accident sued upon herein as described in Plaintiff’s Complaint.

REQUESTS

1. Any and all documents, statements, correspondence, or records of any description pertaining to the Plaintiff, or to the accident involving the Plaintiff.

RESPONSE:

2. Any and all documents, reports, memoranda, notes, recordings or statements of any kind by any person or entity which refer or relate to the accident involving the Plaintiff.

RESPONSE:

3. Any and all documents, forms, check-lists, maintenance logs created by any person or entity that refers or relates to the vehicle involved in accident, whether such material was created before or after the accident.

RESPONSE:

4. Any and all photographs, charts, pictures, images, video, diagrams, drawings, descriptions or other documents referring or relating to the vehicle involved in the accident with the Plaintiff.

RESPONSE:

5. Any and all vehicle manuals, operating manuals, or other instructions or guidelines referring or relating to the operation or use of the Metro Bus or any equipment located on or in the vehicle involved in the accident with Plaintiff.

RESPONSE:

6. Any and all manuals, handbooks, operating guidelines, policies, procedures, pamphlets, memos, or other documents relating to employees, safety or equipment operation in effect at the time of the accident.

RESPONSE:

7. Any and all maintenance logs or vehicle inspection lists created by Defendant in the two years prior to the accident involving Plaintiff.

RESPONSE:

8. Any and all documentations, including accident reports, internal or external investigations, or other notes pertaining to accidents involving any vehicle driven by driver (agent and/or employee) while in your employ, the same driver on the date of the occurrence.

RESPONSE:

9. Any and all documents memorializing any citations, warnings, or fines issued by any governmental or regulatory body to you or your drivers pertaining to driver operations, automobile regulations, safety, or legal compliance of a vehicle involved in the occurrence.

RESPONSE:

10. All documents detailing the chain of custody of the vehicle immediately after the accident on July 15, 2015.

RESPONSE:

11. All reports, notes, data, and other documents that comprise and investigation of the case or circumstances of the _____ accident, including technical investigations of the vehicle as relates to the accident.

RESPONSE:

12. Any and all documents or things which defendant expects to introduce at trial.

RESPONSE:

13. Any and all documents identified or relied upon in answers to Plaintiff's First Interrogatories.

RESPONSE:

14. If a blood alcohol test of any kind was performed on the Defendant's employee and/ agent, the driver of the metro bus during the 48 hours after the occurrence which is the subject of this litigation, please introduce a copy of the medical laboratory report which contains the results of each such test.

RESPONSE:

15. If a medical test for illegal drugs, including, but not limited of, cocaine, crack, marijuana and/or heroin, was performed on the defendant during the 48 hours after the occurrence which is the subject of this litigation, please produce a copy of the medical laboratory report which contains the results of each such test.

RESPONSE:

Attorney's Name, Bar#
Attorney for Plaintiff/Defendant
Address
Phone