

STATE OF NORTH DAKOTA

IN DISTRICT COURT

COUNTY OF _____

_____ JUDICIAL DISTRICT

_____,)
)
 Plaintiff,)
)
 vs.)
)
 _____,)
)
 Defendant.)

Civil No. _____

REQUEST FOR PRODUCTION OF DOCUMENTS TO _____

TO: _____, _____, ABOVE-NAMED, BY AND THROUGH (HIS) (HER) ATTORNEY, _____, _____.

YOU ARE HEREBY REQUESTED, pursuant to Rule 34 of the North Dakota Rules of Civil Procedure, to produce at the offices of _____, _____, North Dakota, and there permit plaintiff to inspect, copy, test, sample, measure, and photograph the following items, or, in lieu thereof, that the defendant furnish to plaintiff copies of the following within (thirty) (forty-five) (30) (45) days of this request.

1. Complete copies of all personal federal and state income tax returns signed by you, including all schedules and forms attached thereto, for tax years _____ to the present.
2. All documents which will be used to prepare your tax returns for the current year.
3. All documents that reflect any income received by you from _____ to the present including, but not limited to:
 - a. IRS Forms W-2, 1099, and K-1;
 - b. paycheck stubs;
 - c. bonus check stubs;
 - d. income receipts or vouchers;
 - e. expense reimbursement records;
 - f. dividend or interest statements;
 - g. rental income records;
 - h. copies of checks or check stubs; and

- i. deposit records.
4. All documents that detail or reflect any interest that you have had since _____ in any vested and unvested employment benefits including, but not limited to:
 - a. bonus or incentive plans;
 - b. benefit booklets;
 - c. medical, dental, disability, health, and life insurance coverage;
 - d. stock option plans;
 - e. deferred compensation plans;
 - f. profit sharing plans or statements of account;
 - g. any other retirement plans or statements of account; and
 - h. summary plan descriptions.
 5. All financial statements prepared from _____ to the present by you or on your behalf.
 6. All personal checking account records for any joint or separate account used by you, or in which you have or have had any interest, from _____ to the present, specifically including:
 - a. account statements;
 - b. canceled checks;
 - c. check registers; and
 - d. deposit tickets.
 7. All statements from _____ to the present for each bank account, savings account, money market account, liquid asset account, credit union account, insurance account, brokerage firm account, and depository in which you have or have had any interest.
 8. All documents relating to any joint and/or separate interest you have or have had in and to any stock, bonds, debentures, Treasury Bills, notes, or other investments from _____ to the present.
 9. All documents relating to any real property in which you have or have had any interest since _____, jointly or individually, specifically including:
 - a. purchase agreements;
 - b. closing documents;
 - c. warranty deeds;
 - d. mortgage applications;
 - e. mortgage statements;
 - f. appraisals; and
 - g. market analyses.

10. All documents relating to insurance assets in which you have or have had any interest since _____, jointly or individually, specifically including:
 - a. copies of each policy;
 - b. loan statement;
 - c. premium statement; and
 - d. statements of actual or projected cash value.
11. All documents pertaining to motor vehicles, boats, or other recreational vehicles in which you have any interest.
12. All documents relating to any contingent assets or expectancies, such as annuities, trusts, wills, probate and estate records and evidence of distributions.
13. All documents, records, notes and files, not already provided in response to any of the foregoing requests, relating to any assets worth more than _____ that you have owned from _____ to the present.
14. All documents from _____ to the present evidencing any debts that you have incurred, jointly or individually, specifically including:
 - a. promissory notes;
 - b. invoices;
 - c. bills;
 - d. credit card statements; and
 - e. other account statements.
15. All documents, records, notes, and files that establish, support, trace, and/or prove your claims of non-marital contributions or entitlements.
16. All pleadings relating to any litigation or Court proceedings in which you are involved, other than this proceeding.
17. Copies of all expert reports and any documents, records, notes, and files that served as a basis for the expert's opinion.
18. Copies of all exhibits that you intend to offer at trial.
19. If any of the requested information is electronically stored in a computer, on a computer disk, or by any other means of electronic data compilation or storage, provide the printed copies of the stored data, and computer-readable copies on disks.
20. All resumes, transcripts, diplomas, certificates, or other evidence of your

academic accomplishments and employability, including evidence of any job offers or efforts to obtain employment.

21. All documents or records that evidence your inability to obtain or maintain employment, including but not limited to medical records, school records, and assessments.
22. All records or reports relating to any medical or mental health care or treatment or other counseling that you or the minor child(ren) have received since _____.

BUSINESS ASSET OPTIONS

23. Complete copies of all Federal and State Income Tax Returns, including all schedules and forms attached thereto, for tax years _____ to the present for each and every business or enterprise in which you have or have had an ownership interest since _____.
24. All financial and cash flow statements prepared from _____ to the present for or on behalf of each and every business or enterprise in which you have or have had an ownership interest since _____.
25. All business checking and depository account records from _____ to the present, specifically including account statements, canceled checks, and check registers for any joint or separate account used by you or in which you have or have had any interest since _____.
26. Payroll records from _____ to the present, for all business enterprises in which you have or have had any ownership interest since _____.
27. A copy of the Articles of Incorporation of any corporation in which you have or have had an ownership interest since _____.
28. Copies of corporate minutes from _____ to the present for any corporation in which you have or have had an ownership interest since _____.
29. All copies of shareholder agreements for any business in which you have or have had an ownership interest.
30. A list of equipment owned by any business in which you have or have had an ownership interest.
31. A complete list of all assets and liabilities of any business in which you have or have had an ownership interest.
32. All documents evidencing accounts receivable from _____ to the present for

any business in which you have or have had an ownership interest.

- 33. All documents evidencing accounts payable from _____ to the present for any business in which you have or have had an ownership interest.
- 34. A copy of all budgets and projections prepared from _____ to the present for any business in which you have or have had any ownership interest.

Said inspection and copying shall take place on _____, at the offices of _____, _____, North Dakota, or at such other time and place as the parties may mutually agree.

Dated this ____ day of _____, _____.

By _____

Address

Telephone:

ND License No.:

ATTORNEYS FOR _____