

**IN THE SUPERIOR COURT OF _____ COUNTY
STATE OF GEORGIA**

))
_____,)
Plaintiff,)
v.)
_____) Civil Action File No. _____
Defendant)
)
)

**REQUEST FOR PRODUCTION OF DOCUMENTS AND
NOTICE TO PRODUCE**

TO: _____
Employer's Name

Employer's Address

NOW COMES _____, Plaintiff or
 Defendant herein, and files this, his/her Request for Production of Documents pursuant
to the provisions of O.C.G.A. § 9-11-34(c). You are requested to produce within 30 days
the documents set forth below for inspection and copying by Plaintiff at the following
location: _____

Pursuant to the provisions of O.C.G.A. § 24-10-26, you are also served with this Notice
to Produce. In accord with O.C.G.A. § 24-10-26, you are required to produce the
following documents at the time of the taking of any deposition, upon the hearing of any
interlocutory matter, motion, hearing on contempt, and upon any trial of this cause.

Definitions: Your employee, _____ [Name]
_____ [Social Security Number] is the Plaintiff/ Defendant in
this action. He/ She shall be referred to hereinafter as "Employee."

The documents and records which you are notified and requested to produce are as
follows:

1.

All employment contracts or agreements, memoranda or correspondence between
the Employee (SSN) _____ and _____.
[Employee's Social Security Number] [Employer's Name]

2.

All payroll records reflecting payments of salary, wages, bonuses and other compensation of any nature to the Employee from January 1, _____ [Year] to the date of this request.

3.

All documents, receipts and vouchers reflecting funds or other consideration provided to the Employee, directly or indirectly, for reimbursement, remuneration or otherwise as an expense account or reimbursed expenses from January 1, _____ [Year] to the date of this request.

4.

All records of benefits paid to or expenses paid in behalf of the Employee by _____ [Employer's Name], including but not limited to, retirement plans, company savings plans, incentive plans, buy/sell agreements or stock options from January 1, _____ [Year] to the date of this request.

5.

All monthly statements and records, receipts and year-end summaries for all charge card accounts in the name of the Defendant or which are paid for, in whole or in part, on his behalf, by _____ [Employer's Name] from January 1, _____ [Year] to the date of this request.

6.

All documents which reference the terms, conditions, benefits, or balances of any retirement plan, profit sharing plan, stock purchase plan, company savings plan or deferred compensation plan through _____ [Employer's Name], in which the Employee has participated from January 1, _____ [Year] to the date of this request.

7.

All documents which reference the terms, conditions or benefits of any life, disability or health insurance available to the Employee through _____
_____[Employer's Name], including but not limited to, plan descriptions, a list of enrolled dependents and the cost to Employee for coverage.

RESPECTFULLY SUBMITTED, this _____ day of _____, 20 _____.

 Plaintiff or Defendant *pro se*

Address: _____

Telephone Number(s): _____