COMMONWEALTH OF MASSACHUSETTS

«county», ss. SUPERIOR COURT

 DOCKET NO. «docket»

«plaintiff» )

 Plaintiff, )

 )

VS. )

 )

«defendant» )

 Defendant. )

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**PLAINTIFF, «plaintiff»’S FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS FOR THE DEFENDANT, «defendant»**

 The Plaintiff, «plaintiff», pursuant to Rule 34 of the Massachusetts Rules of Civil Procedure, requests that the Defendant, «defendant», produce and permit the plaintiff to inspect, copy and photograph all non-privileged documents and things in the defendant’s possession, custody or control, which embody, refer to or relate to the following subjects.

**DEFINITIONS**

For purposes of these Requests the uniform definitions set forth in Superior Court Standing Order 1-09 shall apply, and in addition, the following definitions shall apply, unless otherwise specified:

1. “You”, “your”, and “Defendant” shall refer to the named Defendant, «defendant»;
2. “Plaintiff” will refer to the named Plaintiff, «plaintiff», their agents, servants, employees, and trustees.

**REQUESTS**

REQUEST NO. 1

REQUEST NO. 2

REQUEST NO. 3

REQUEST NO. 4

REQUEST NO. 5

REQUEST NO. 6

REQUEST NO. 7

REQUEST NO. 8

REQUEST NO. 9

REQUEST NO. 10

REQUEST NO. 11

REQUEST NO. 12

REQUEST NO. 13

REQUEST NO. 14

REQUEST NO. 15

REQUEST NO. 16

REQUEST NO. 17

REQUEST NO. 18

REQUEST NO. 19

REQUEST NO. 20

REQUEST NO. 21

REQUEST NO. 22

 Respectfully submitted,

 The Plaintiff,

 «plaintiff»

 By its attorneys,

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Date: December 19, 2017