

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS AND THINGS TO DEFENDANT

PLEASE TAKE NOTICE that pursuant to Rule 34 of the Hawai'i Rules of Civil Procedure, Plaintiff requests that Defendant produce and permit the inspection and/or copying of the documents and/or things specified below.

As used in this request for production of documents and things, the term "documents" includes statements, writings and recordings of every kind (mechanical, electronic, typed or written), including, but not limited to, letters, correspondence, maps, diagrams, photographs, motion pictures, memoranda, notes, reports and transcriptions in the possession of, subject to the control of, or within the knowledge of Defendant or counsel for Defendant, or any consultants or experts retained by Defendant or counsel for Defendant.

If you decline to produce any of the requested documents or things on the ground of privilege, please provide a descriptive list of each such document or thing and state the grounds for your refusal to produce each such document or thing.

DOCUMENTS OR THINGS TO BE PRODUCED

1. Copies of any statements made by Plaintiff, any defendant, and any witness.
2. Copies of any photographs, videotapes or motion pictures taken regarding this case.
3. Copies of any report of slip(s) and/or trip(s) and/or fall(s) in the area where this incident occurred for the five-year prior to the date of this incident and during the two-year period subsequent to the date of this incident, as referred to in Plaintiff's interrogatories to Defendant, Interrogatory No. 5.

4. Copies of any report and/or complaint made with regard to a condition of the floors and/or walking surfaces in the area where this incident occurred, as referred to in Plaintiff's interrogatories to Defendant, Interrogatory No. 6.

5. Copies of any documents describing or referring to the system or routine of inspecting and/or maintaining the floors and/or stairs and/or carpeting and/or walking surfaces of the area where this incident occurred in effect as of the date of this incident, as referred to in Plaintiff's interrogatories to Defendant, Interrogatory No. 7.

6. Copies of any agreement between the named defendant and any individual or entity hired to assist with the maintenance or care of the area where this incident occurred in effect as of the date of this incident, as referred to in Plaintiff's interrogatories to Defendant, Interrogatory No. 8.

7. Copies of any document referring to or describing any repairs, replacements, or alterations to the floor and/or walking area and/or floor covering of the area where this incident occurred which were performed after this incident.

8. Copies of any documents which refer to any inspection made of the area where this incident occurred on the date of this incident, prior to the time the incident occurred, as referred to in Plaintiff's interrogatories to Defendant, Interrogatory No. 10.

DATED: _____, Hawai'i, _____.

Attorney for Plaintiff