

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

PLEASE TAKE NOTICE that pursuant to Rule 34 of the Hawai'i Rules of Civil Procedure, Defendant requests that Plaintiff 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 Plaintiff or counsel for Plaintiff, or any consultants or experts retained by Plaintiff or counsel for Plaintiff.

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 each and every report made by any plaintiff or any defendant to anyone regarding the facts of the incident and/or the events leading up to it.
4. The footwear worn by Plaintiff at the time of this incident.

DATED: \_\_\_\_\_, Hawai'i, \_\_\_\_\_.

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Attorney for Defendant