

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

TO _____

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

As used in this request for production of documents, 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 _____, or counsel for _____, or any consultants or experts retained by _____, or counsel for _____.

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

1. Copies of any statements made by Plaintiff, Defendant, and any witness.
2. Copies of any photographs, videos, diagrams, and/or diaries taken or made regarding this case.

3. Copies of each and every report made by Plaintiff or Defendant to anyone regarding the facts of the accident and/or the events leading up to it.

4. Copies of all repair estimates and bills relating to and substantiating the extent and nature of damage(s) to the vehicle(s) involved in the accident, which damage(s) occurred as a result of the accident.

5. Copies of the declaration sheet of all applicable policies of insurance:

_____.

6. All documents substantiating the ownership of the vehicle(s) involved in the accident, if any.

7. If wage loss and/or income loss claim is being made, copies of federal or state tax returns from the Plaintiff for the two calendar years before the year of the accident.

The documents requested above are to be made available for inspection and copying at the offices of _____

within (30) days after receipt of this Request.

DATED: _____, Hawai'i, _____.

Attorney(s) for _____