

Please take further notice that you may forward photostatic or electronic copies of said documents in lieu of said inspection prior to the above-mentioned date.

I. INSTRUCTIONS

DEFINITIONS

The word “document” means any written, printed, typed, computerized, programmed, Internet-based, or graphic matter of any kind or nature, however produced or reproduced, and all mechanical and electronic sound recordings or transcripts thereof, however produced or reproduced, including, but not limited to memoranda, correspondence, reports, notes of telephone conversations and conferences, studies, analyses, bulletins, instructions, inter- and intra-office communications, charts, graphs, photographs, and all forms and means of data compilations and recordings.

II. DOCUMENTS

Documents to be provided are:

1. Any and all documentation regarding your Facebook account from _____ through the date of production. Said requests include communication made by other people on your personal site or pages including, but not limited to:
 - a. Comments
 - b. Posts
 - c. Private messages
 - d. Chat sessions
 - e. Images
 - f. Videos
 - g. Links
 - h. Facebook groups
 - i. Facebook pages
 - j. Your Facebook archive, which can be obtained here:
<https://www.facebook.com/help/131112897028467>

2. Any and all documentation of your entire Twitter history from _____ through the date of production, including, but not limited to:
 - a. Tweets sent
 - b. Mentions
 - c. Direct messages
 - d. A list of followers
 - e. A list of those you follow
 - f. Your Twitter archive, which can be obtained here:
<https://support.twitter.com/articles/20170160-downloading-your-twitter-archive>

3. Any and all documentation regarding your Google Plus account from _____ through the date of production, including, but not limited to:
 - a. +1s
 - b. Contacts and circles
 - c. Picasa web albums
 - d. Your profile
 - e. Your stream
 - f. Your official Google Plus archive, which can be obtained with these instructions: <http://googleplus.wonderhowto.com/how-to/download-your-data-with-google-takeout-0128930/>

4. Any and all documentation regarding your LinkedIn profile from _____ through the date of production, including, but not limited to:
 - a. Your connections
 - b. Your bio
 - c. Your activity stream
 - d. Your LinkedIn messages
 - e. Your LinkedIn invitations to connect

5. Any and all documentation, pictures, images, videos or other digital media contained in an online storage account from _____ through the date of production, including, but not limited to:
 - a. Picasa
 - b. Shutterfly
 - c. Picasa web albums
 - d. Flickr
 - e. Instagram
 - f. Pinterest
 - g. YouTube
 - h. Any other web service that handles storage of digital images

6. Any and all printouts, documentation or computer files evidencing electronic mails (emails) between Defendant and any third party, whether sent or received, from _____ through the date of production.

7. Any and all documentation from _____ through the date of production, to the present with regard to any cell phone, blackberry or other mobile communication device, including an itemization of any incoming and outgoing calls, text messages, emails or picture files, as well as an indication of the sender and/or recipient.

8. Any and all printouts, documentation, archives, or computer files evidencing the use of any “instant messenger service” between Defendant and any third party, whether sent or received, from _____ through the date of production. An “instant messenger service” is defined as an online provider permitting parties to communicate by sending messages through the provider. Examples include, but are not limited to:
 - a. Skype
 - b. iMessage
 - c. Yammer
 - d. Microsoft Lync IM
 - e. Third-party telephone apps (such as Tango, Viber, Words with Friends, etc.)
 - f. Yahoo™ Instant Messenger
 - g. MSN™ Messenger
 - h. AOL™ Instant Messenger
 - i. Windows Messenger Service
9. Any and all electronic recording devices and all tapes or digital storage associated with such device which Defendant has used, or has authorized the use of, from _____ through the date of production.
10. Any and all computer files from any business or personal financial management computer program which you have used, such as Quicken, Microsoft Money or TurboTax, from _____ through the date of production.
11. Any and all computer files which contain electronic copies for monthly statements and canceled checks for all checking accounts, savings accounts, or money market accounts from any such account you may have with any bank or other financial institution or for any accounts in which Defendant may have had an interest or signature authority, whether personal, corporate, business or trust account, from _____ to the present.

III. INTERROGATORIES

1. State with particularity any and all electronic mail addresses through which you have sent or received email from _____ to the present. For each account, additionally state the following:
 - a. The length of time during which you used such account;
 - b. All other persons you authorized to access such account;
 - c. Whether you have deleted emails to/from third parties since the institution of this action; and
 - d. Which files, images or attachments you have deleted since _____ that pertain to this action.

2. State with particularity any and all Instant Messenger Services to which you have subscribed since _____. For each such service, additionally state the following:
 - a. Any and all usernames utilized by you;
 - b. Whether you retained a log of all messages sent and received;
 - c. When, if at any time, you deleted such log; and
 - d. All other persons with access to your username and password for such service.

3. State with particularity whether you have subscribed to any online dating or matchmaking services since _____. Examples of such services include, but are not limited to, match.com, eharmony.com, adultfriendfinder.com or itsjustlunch.com. For any such service to which you have subscribed, additionally state the following:
 - a. Your login or username;
 - b. The date on which you first subscribed to such service;
 - c. The total fees paid by you or on your behalf for subscribing to such service;
 - d. The username(s) of the persons who sent correspondence to you through such service; and
 - e. The username(s) of the persons to whom you sent correspondence through such service.