

NORTH CAROLINA  
\_\_\_\_\_ COUNTY

IN THE GENERAL COURT OF JUSTICE  
DISTRICT COURT DIVISION  
FILE NO. \_\_\_\_\_

\_\_\_\_\_, )  
Plaintiff, )  
v. )  
\_\_\_\_\_, )  
Defendant. )

**\_\_\_\_\_’S FIRST  
REQUEST FOR PRODUCTION  
OF DOCUMENTS**

TO:

Pursuant to Rule 34 NCRCP, the defendant hereby serves upon you the following Requests for Production of Documents. The plaintiff is requested to produce the requested documents or tangible things at the office of \_\_\_\_\_, \_\_\_\_\_ North Carolina, on or before a date thirty (30) days after service of these Requests.

**DOCUMENTS TO PRODUCE**

- 1. Documentation of your earnings and any other sources of income for the past three (3) years, including W-2 forms, 1099 forms, loans, gifts, paystubs, cancelled checks, cash receipts, etc.

RESPONSE:

- 2. Copies of all monthly, quarterly and/or annual bank account statements, cancelled checks and checkbook registers for all accounts (checking, savings, money market, certificate of deposit and any other accounts) (whether individually or jointly held or accounts on which you are authorized to withdraw funds) from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

- 3. Copies of all monthly, quarterly and/or annual investment account statements (whether in your individual name or jointly held or from which you are authorized to withdraw funds) from January \_\_\_\_\_ to the present.

RESPONSE:

4. Copies of all safety deposit box inventories from January \_\_\_\_\_ to the present.

RESPONSE:

5. Copies of all stock certificates and bonds in your individual name or jointly held from January \_\_\_\_\_ to the present, including stock(s) or bonds sold or transferred during the requested period of time.

RESPONSE:

6. Documentation of any other investments in which you have had any interest from January \_\_\_\_\_ to the present, including investments you have sold or transferred during the requested period of time.

RESPONSE:

7. Copies of any financial statements and/or credit applications prepared by you or on your behalf from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

8. Copies of notes, judgments, liens, court orders and any other documentation of all indebtedness owed by you or for which you may be liable, showing amounts owed on date of separation and currently, security for the indebtedness and guarantors for the indebtedness.

RESPONSE:

9. Copies of all pleadings, discovery and correspondence for any lawsuits (other than this action) in which you or any business in which you have had an interest were involved during the past five (5) years to the present.

RESPONSE:

10. Documentation showing all indebtedness you have fully satisfied or paid in full from January \_\_\_\_\_ to the present.

RESPONSE:

11. Copies of titles of all vehicles owned by you on the date of separation (BUSINESS AND PERSONAL).

RESPONSE:

12. Financial Affidavit itemizing your current household expenses.

RESPONSE:

13. Copies of property tax listings from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

14. Copies of property tax payment notices/statements for January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

15. Copies of any and all monthly ledgers, journal entries, statements, compilations or any other documents itemizing the income and expenditures for rental properties from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

16. Documentation showing the names, addresses and telephone numbers of all tenants leasing rental property from you or any business in which you have had an interest from \_\_\_\_\_ to the present.

RESPONSE:

17. Copies of notes, accounts receivable or other written evidence of indebtedness owed to you or to any business in which you have had an interest from \_\_\_\_\_ to the present.

RESPONSE:

18. Documentation of all travel expenses/vacations taken from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL), including copies of all hotel or motel receipts, convention or seminar registrations and any other documentation identifying the motels or hotels and dates stayed from January \_\_\_\_\_ to the present.

RESPONSE:

19. Complete copies of any and all credit card statements for business and/or personal use from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL). Please include all annual statements summarizing and categorizing all of the charges for the year.

RESPONSE:

20. Copies of any and all insurance policies insuring any real estate owned by you, either separately or jointly, or by any business entity in which you have an ownership interest including all riders and other attachments to the policies from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

21. Any and all reports and appraisals prepared for the purpose of establishing the value of any property in which you or any business entity in which you are involved has any interest (BUSINESS AND PERSONAL). Include the requested information for any property sold or transferred within the past three (3) years.

RESPONSE:

22. Copies of partnership agreements, employment contracts and any other documents regarding business ventures executed by you (BUSINESS AND PERSONAL), which are in effect as of the date of separation and currently, as well as those agreements, contracts, etc., which expired or terminated within the three (3) years prior to the date of separation.

RESPONSE:

23. All written records of stock transfers from January \_\_\_\_\_ to the present (*i.e.*, buying, selling, exchanging, gifting, etc.) involving stock in any corporation in which you have or have had an interest.

RESPONSE:

24. If you have been entitled to any interest or stock option, vested or non-vested, within the past three (3) years and have assigned, sold, transferred or conveyed any interest in that right to receive monies, income, property or compensation, itemize the date of sale, the person, corporation or entity to whom such was sold or assigned, together with a copy of any and all contracts, closing documents or other indicia of such sale or conveyance.

RESPONSE:

25. The stock books of any corporation in which you have had an interest from January \_\_\_\_\_ to the present.

RESPONSE:

26. Copies of the Minutes of Board of Directors and Shareholder meetings for any corporation in which you have had an interest from January \_\_\_\_\_ to the present.

RESPONSE:

27. A complete copy, including all schedules and attachments, of any partnership tax returns, corporate tax returns and K-1's for any business in which you have had any interest from \_\_\_\_\_ to the present.

RESPONSE:

28. A complete copy, including all schedules and attachments of all personal income tax returns (FEDERAL AND STATE) from \_\_\_\_\_ to the present.

RESPONSE:

29. Monthly bookkeeping statements, profit and loss statements, balance sheets and income statements from January \_\_\_\_\_ to the present (BUSINESS AND PERSONAL).

RESPONSE:

30. Copies of all deeds and deeds of trust in your name (BUSINESS AND PERSONAL) or being held by a third party for you from \_\_\_\_\_ to the present.

RESPONSE:

31. Please attach a copy of each offer to buy, offer to sell, option to buy, option to sell, contract, letter or memo which you or any business, partnership, corporation or individual acting on your behalf has made or received during the preceding five (5) years prior to responding to these requests regarding either real or personal property.

RESPONSE:

32. Copies of all life insurance policies owned by you, your spouse or your business, including a statement from each company regarding the beneficiary and the amount of the cash value from January \_\_\_\_\_ to the present and whether or not the beneficiary changed and/or funds were withdrawn during this time period.

RESPONSE:

33. If you have cancelled any life insurance policy or have withdrawn cash from any policy within the past three (3) years, produce documentation from the insurance company verifying the date of the cancellation or withdrawal and any funds paid to you as a result of the cancellation or withdrawal.

RESPONSE:

34. Any and all lease or rental agreements on real property, equipment or any other personal property (BUSINESS AND PERSONAL) from \_\_\_\_\_ to the present.

RESPONSE:

35. Copies of monthly, quarterly and/or annual statements showing the account balances, all activity and value of ALL pension, retirement accounts, employee fringe benefit accounts from January \_\_\_\_\_ to the present, including all defined benefit plans, defined contribution plans, IRAs, savings plans, profit sharing plans, 401(k) plans, ESOPs, etc.

RESPONSE:

36. Documentation showing all churches, political campaigns or any other organizations to which you have made contributions from January \_\_\_\_\_ to the present.

RESPONSE:

37. Documentation of all gifts given to third parties other than the defendant from January \_\_\_\_\_ to the present.

RESPONSE:

38. Documentation of any and all real property owned by you from \_\_\_\_\_ to the present (individually or jointly) or owned by any entity in which you had an interest, including copies of all deeds and closing statements or other documentation showing the date of purchase and the purchase price.

RESPONSE:

39. Documentation of any and all real property sold or transferred by you or by any entity in which you had an interest, including a copy of the closing statements from \_\_\_\_\_ to the present.

RESPONSE:

40. A copy of your Equitable Distribution Affidavit itemizing all marital property, divisible property, separate property and liabilities.

RESPONSE:

41. Documentation you contend supports your claim that any assets are your separate property.

RESPONSE:

42. For all expert witnesses you plan to have testify, provide a copy of his/her report. Please supplement your response each time an expert is retained or a subsequent report is received.

RESPONSE:

43. Unless provided in response to a previous request, provide documentation showing any property you have; asset, income or other things of value you have transferred, sold, assigned, conveyed, discounted or waived the right to receive from \_\_\_\_\_ to the present.

RESPONSE:

44. Documentation showing all land base and/or mobile phones and pagers in your name or regularly used by you from \_\_\_\_\_ to the present. Include documents showing all land base and/or mobile telephone numbers and the name of the service provider.

RESPONSE:

45. Copies of all telephone bills and statements from January \_\_\_\_\_ to the present, including mobile phones and land base phones (BUSINESS AND PERSONAL).

RESPONSE:

46. Copies of any and all documents, audio tapes, video tapes, private investigative reports, DVDs, recordings and any other evidence you contend supports your allegations, claims and/or defenses in this lawsuit.

RESPONSE:

47. Copies of all cards, letters or other writings received from third parties or given to third parties, other than your spouse, from January \_\_\_\_\_ to the present.

RESPONSE:

48. Documentation showing all Internet addresses and providers used by you from \_\_\_\_\_ to the present.

RESPONSE:

49. Copies of all email communications in your possession or control which were either sent or received by the opposing party.

RESPONSE:

This the \_\_\_\_ day of \_\_\_\_\_, 20\_\_.

BY:

\_\_\_\_\_  
\_\_\_\_\_  
Attorney for \_\_\_\_\_  
NC State Bar No. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_, NC \_\_\_\_\_

Telephone No.: \_\_\_ - \_\_\_ - \_\_\_\_

Fax No.: \_\_\_ - \_\_\_ - \_\_\_\_

ADDITIONAL REQUESTS FOR BUSINESS VALUATIONS

1. Yearend audited, reviewed or compiled financial statements prepared by you, an independent CPA or accountant, or lending institution for the past six years (BUSINESS AND PERSONAL).
2. Personal state and federal income tax returns of the owners, forms 1040, for the past six years.
3. State and federal business income tax returns, completed with all schedules and attachments, for the past six years.
4. State and federal gift tax returns, complete with all schedules and attachments, for the past six years.
5. IRS or other governmental agency examination reports and work papers, including all adjustments made regarding the business, for the same six years.
6. List of officers/owners and their compensation for the past six years.
7. Analysis of changes in ownership of the business during the past six years.
8. Copies of all profit and loss statements, financial statements, income statements and any other documents showing assets, profits and liabilities in the past six years.
9. General ledgers (DO NOT COPY, just have available) for the past six years.
10. Year-end adjusting entries made by CPA or tax preparer for the past six years.
11. Detail depreciation schedules, book and tax, for the year-end for the past six years. Be sure it gives description, date acquired, original cost, prior years' depreciation and method used.
12. County ad valorem tax listings and bills for all real and personal property of the company for the past six years.
13. Accounts receivable aging report as of DOS and the most recent year-end.
14. All loan agreements, notes, security agreements, deeds of trust and any other documents evidencing any indebtedness from \_\_\_\_\_ to the present.
15. Any and all leases existing from \_\_\_\_\_ to the present.



16. Any buy/sell, non-compete or stock redemption contracts, or any other contracts between stockholders/owners or officers of the company.
17. Minute book (DO NOT COPY) (if a corporation) containing all minutes for the last 10 years.
18. Copy of year-end inventory count sheets as of DOS and most recent year-end.
19. All insurance policies (life, property and casualty, liability, disability, etc.) in force as of DOS and at most recent year-end. If any are whole life policies, please provide statements showing cash values from \_\_\_\_\_ to the present.
20. Any appraisals of buildings, equipment or vehicles that have been performed in the past six years.
21. A complete copy of any and all business appraisals, including all schedules, attachments, work sheets, notes, analysis, supporting information, etc.
22. Aged accounts payable listing as of DOS and at most recent year-end.
23. Information on any pending or contingent asset or liability (threatened or actual lawsuits, environmental or governmental problems or claims, insurance claims, etc.).
24. Approximate size and age of each real estate facility. Copies of all deeds, leases and any other agreements related to all company-owned or company-used real estate.
25. Any employee benefit or retirement plan documents. Copy of personnel or policy manual of company and deferred compensation contracts (all as of DOS and most recent year-end.)
26. For retirement or pension plans, copy of form 5500, Annual Returns filed and participants statements for past six years.
27. Any information concerning prior sales or offers to buy interests in the company or options to purchase.
28. Any agreements or contracts with major suppliers or customers.
29. Any warranty or guarantee agreements.
30. Any other significant contract or agreement concerning the company.
31. Copy of articles of incorporation and bylaws, if incorporated and operating agreements.
32. Stock record book, showing stock certificates issued to owners of the corporation and any transfers.

33. List of any related companies, showing ownership and any changes in ownership.
34. Copy of any personal financial statements prepared for the parties in the past six years.
35. A description of any related party transactions of the business (sales to/from owner, leases with owner, loans to owner, etc.) in the past six years.
36. List of key personnel showing date of hire, annual compensation, job description and fringe benefits.
37. Organizational chart of company.
38. List of any supplier or customer who comprises 5 percent or more of annual purchases or sales, showing dollar amounts, for the past six years.
39. Any budgets, forecasts or projections that have been done in the past six years.
40. Any industry or trade surveys, market data, financial data, etc.
41. Any marketing or advertising literature you may have — catalogs, brochures, ads, etc.
42. Any and all trust documents showing all trusts into which you, or anyone on your behalf, has transferred any asset in the past 10 years, including but not limited to all documents showing a transfer of all or part of \_\_\_\_\_ and/or its subsidiaries into a trust. The documents produced should include a copy of all original and amended trust documents showing all of the parties to the trust, when the trust was established, all items and assets of the trust and whether or not the trust is revocable or irrevocable, a description of the shares transferred (voting or non-voting), etc.
43. Account statements, cancelled checks and check registers from \_\_\_\_\_ to the present for all bank accounts, including but not limited to checking, savings, money market, certificates of deposit, etc.
44. Monthly, quarterly and annual statements for all investment accounts from \_\_\_\_\_ to the present.
45. Documentation of all funds (salary, loans, bonuses, commissions, etc.) paid to the plaintiff/defendant for the past six years. Include the date, the amount and a description of the type of payment.
46. Documentation of all expenses paid for or on behalf of the defendant, including but not limited to medical insurance, dental insurance, life insurance, transportation, housing, vacations, travel, etc.
47. A copy of your last will and testament.

