

NORTH CAROLINA
_____ COUNTY

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
File No. ____-CVD-____

_____,
Plaintiff,
v.
_____,
Defendant.

**FIRST REQUEST
FOR PRODUCTION
OF DOCUMENTS**

TO: _____
Attorney for Plaintiff/Defendant
Address

PLAINTIFF/DEFENDANT HEREBY REQUESTS pursuant to Rules 26 and 34 of the North Carolina Rules of Civil Procedure that you produce the following records and objects:

1. Copies of your federal and state income tax returns with copies of all W-2, K1 and 1099 forms for the last four (4) years, together with a statement from all employers since January 1, 20__ year to date of gross and net earnings from January 1, 20__, to date, setting forth all deductions from your gross pay each pay period.

RESPONSE:

2. Copies of any and all financial statements prepared by or for you and/or your spouse individually during the last four (4) years.

RESPONSE:

3. All titles to personal property owned by you individually or with others, including your spouse, within the six (6) months prior to the date of separation.

RESPONSE:

4. Deeds to real estate titled to you individually or with others, including your spouse, within the six (6) months prior to the date of separation.

RESPONSE:

5. Documents from all financial institutions reflecting account balances as of the date of separation as well as monthly statements for the period commencing three (3) years before and for each month after the date of separation for accounts in your name

individually or with others, including your spouse. This is intended to include bank accounts, money market accounts, IRA's, stocks, bonds and any other investments.

RESPONSE:

6. Lease Agreements for real estate and personal property in effect on the date of separation in your name individually or with others, including your spouse.

RESPONSE:

7. Stock certificates (including closely held corporations) and/or bonds (including savings bonds) in your name or your spouse's name as of the date of separation.

RESPONSE:

8. Life insurance policies owned by you within six (6) months of the date of separation without regard to the life insured; plus, documentation of the gross cash surrender of each policy as of the date of separation.

RESPONSE:

9. Life insurance policies owned by your spouse within six (6) months of the date of separation without regard to the life insured; plus, documentation of the gross cash surrender value of each policy as of the date of separation.

RESPONSE:

10. Documentation of all burial plots owned by you and/or your spouse as of the date of separation.

RESPONSE:

11. Documentation of all investments owned by you individually or with others, including your spouse, within the six (6) months prior to the date of separation, not provided pursuant to any of the above requests.

RESPONSE:

12. Documentation of all employment benefits, whether vested or non-vested as of the date of separation or to the closest date thereto, which resulted from your employment during the marriage to your spouse, including, but not limited to: employee handbooks, retirement plans, stock option plans, ESOP, savings plans or 401(k) plans.

RESPONSE:

13. Documents reflecting work performed prior to separation which was compensated after separation, including, but not limited to, commissions, bonuses, incentives, stock options or other compensation.

RESPONSE:

14. Employer-issued benefit statements closest to the date of separation reflecting benefits to which you were entitled or vested.

RESPONSE:

15. Employment contract and/or consulting contracts to which you were a party as of the date of separation.

RESPONSE:

16. Pre-Marital Agreements, Separation Agreements or Post-Marital Property Agreements with your spouse.

RESPONSE:

17. All appraisal reports for any marital or separate property made within the past two (2) years.

RESPONSE:

18. Reports from all expert witnesses you plan to call as witnesses.

RESPONSE:

19. Reports from any investigator you plan to call as a witness.

RESPONSE:

20. All credit card statements for credit cards used by you or your spouse for the three (3) years prior to the date of separation through the present.

RESPONSE:

21. All canceled checks on accounts in your name individually or with others, including your spouse, for the three (3) years prior to the date of separation through the present.

RESPONSE:

Plaintiff/Defendant requests that you produce the above records at the office of _____, attorney for Plaintiff/Defendant, for inspection and copying on the 30th day following service of this First Request for Production of Documents upon you or, in the alternative, that you mail to or deliver to _____'s attorney on or before the 30th day following service of the Requests for Production of Documents, the original of all such documents with any originals so mailed to be retained by _____'s attorney for 10 days and returned to _____.

THIS the _____ day of _____, 20__.

Attorney for Plaintiff/Defendant
Address
Telephone Number