**IN THE IOWA DISTRICT COURT FOR POLK COUNTY**

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| IN RE THE MARRIAGE OF JOHN DOE AND JANE DOE | |
| Upon the Petition of  JOHN DOE,  Petitioner,  And Concerning,  JANE DOE,  Respondent. | CASE NO. \*\*\*\*\*\*\*\*  **REQUEST FOR PRODUCTION**  **OF DOCUMENTS** |

You are requested to file within thirty (30) days a written response to this Request and to produce those documents for inspection and copying within thirty (30) days of service of this Request at the Law Offices of Mark R. Hinshaw, 1200 Valley West Drive, Suite 208, West Des Moines, IA 50266

1. Your response shall state with respect to each item or category, that inspection-related activities will be permitted as requested, unless the request is refused, in which event the reasons for refusal shall be stated. If the refusal relates to a part of an item or category, that part shall be specified.
2. In accordance with the Iowa Rules, the documents shall be produced as they are maintained in the usual course of business or you shall organize and label them to correspond with the categories in the request.
3. These requests shall encompass all items within your possession, custody or control.
4. These requests are continuing in character so as to require you to promptly amend or supplement your response if you obtain further material information.
5. If in responding to these requests you encounter any ambiguity in construing any request, instruction or definition, set forth the matter deemed ambiguous and the construction used in responding.
6. If you are declining to produce any material requested on the basis of the attorney-client privilege, the work product doctrine, or any other claim of protection or privilege, you must provide the information required by Iowa R. Civ. P. 1.503(5).

**DEFINITIONS**

As used in these requests, the following terms are to be interpreted in accordance with these definitions.

1. The term **“person”** includes any individual, joint stock company, unincorporated association or society, municipal or other corporation, state, which agencies or political subdivisions, and court, or any other governmental entity.
2. The terms **“you”** and **“your”** include the persons to whom these requests are addressed, and all that person’s agents, representatives or attorneys.
3. In accordance with the Iowa Rules, the terms, **“document”** or **“documents”** includes all writings, drawings, graphs, charts, photographs, recordings, and any other data computations from which information can be obtained, translated, if necessary by (you), through detection devices, into reasonably usable form.
4. The term **“occurrence”** means the incident complained of in the Plaintiff’s complaint.

DOCUMENT REQUEST

REQUEST FOR PRODUCTION NO. 1: A current copy of your Earnings and Benefit Estimate Statement from the Social Security Administration. If you do not have a copy, you may request a copy online at <http://www.ssa.gov/mystatement/> or by calling 1-800-772-1213.

REQUEST FOR PRODUCTION NO. 2: All monthly canceled checks and bank statements for any individual or joint personal checking or savings accounts or money market accounts of every kind or nature whatsoever in which you have deposited or withdrawn funds or incurred debts or credits, including Certificates of Deposit, for the last three (3) years up to the date of responding to this Request and all subsequent documents as requested above that come into existence up to the date of trial.

REQUEST FOR PRODUCTION NO. 3: All documents showing or tending to prove or pertaining to your employment, including without limitation wages, salaries, bonuses, stock options, commissions, earnings, income, employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind, credit union accounts, pension plans, stock funds, and other benefits or deductions of any kind which are, were previously, or which may be in the future paid, available, accepted, rejected, credited, offered or withheld of any purposed by any individual, agency, department, company or otherwise, or to which you are, were or may become entitled in the future.

REQUEST FOR PRODUCTION NO. 4: Last three (3) years of your individual and/or joint federal and state income tax returns as well as the last three (3) years of federal and state income tax returns for any other proprietorship corporation (except publicly held and traded corporations), professional corporations, partnership, unincorporated association, trust, joint venture, or other entity in which you hold or have held a legal or equitable interest.

REQUEST FOR PRODUCTION NO. 5: All monthly credit card statements for any credit card of every kind in which you have incurred debts or credits for the last three (3) years up to the date of responding to this Request and all subsequent documents as requested above that come into existence up to the date of trial.

REQUEST FOR PRODUCTION NO. 6: Bank account statements from the date of marriage to present on any and all checking and savings accounts in which you claim(ed) any ownership or upon which you had/have signature privileges.

REQUEST FOR PRODUCTION NO. 7: All account statements and other documents pertaining to any Individual Retirement Accounts (IRA), 401(K) accounts, Life Insurance Policies, Brokerage Accounts or Pensions held in your and/or your spouse’s name.

REQUEST FOR PRODUCTION NO. 8: All stocks, bonds, certificates of deposit, and any and all other types and kinds of securities in which you claim or have claimed any ownership interest or in which you have the right to possession or to sell, assign, or cash in.

REQUEST FOR PRODUCTION NO. 9: All insurance policies including but not limited to life, automobile, home, business, hospital, including basic, umbrella, individual, and/or group.

REQUEST FOR PRODUCTION NO. 10: All annuity and endowment contracts.

REQUEST FOR PRODUCTION NO. 11: Contracts to purchase any type of property from the date of marriage to present in which you claim any interest or held the rights to receive an assignment of any interest.

REQUEST FOR PRODUCTION NO. 12: Records of dividends, interest, or other distributions received or that you may be entitled to receive from the date of marriage to present.

REQUEST FOR PRODUCTION NO. 13: All certificates, papers, bills of sale, sales slips, canceled checks, receipts, and any and all other types of documents that evidence the purchase or ownership of any personal property from the date of marriage to present in which you claim a property interest

REQUEST FOR PRODUCTION NO. 14: As to any partnerships in which you are either a general or limited partner, please furnish the following:

1. Partnership agreement;
2. Any buy-sell agreements between the partners; and
3. Income tax returns and financial statements of the partnership and employment contracts, deferred compensation agreements, insurance, retirement, profit sharing, purchase options, sale options, and severance pay agreements for your benefit from the date of marriage to present.

REQUEST FOR PRODUCTION NO. 15: As to any corporations in which you own stock or stock options where the stock is not publicly traded, produce the following:

1. Stock certificates, stock transfer records, and stock ownership documents in each such company;
2. Any buy-sell agreements involving the stock; and
3. Income tax returns and financial statements of the corporation and employment contracts, deferred compensation agreements, insurance, retirement, profit sharing, purchase options, sale options, and severance pay agreements for your benefit from the date of marriage to present.

REQUEST FOR PRODUCTION NO. 16: Copies of any and all trust instruments under which you are a beneficiary, distribute, trustor, or testator.

REQUEST FOR PRODUCTION NO. 17: Copies of any and all wills under which you are a beneficiary or testator.

REQUEST FOR PRODUCTION NO. 18: Copies of any and all insurance policies under which you are a beneficiary.

REQUEST FOR PRODUCTION NO. 19: Copies of inventory and appraisement of the properties in which you have an interest.

REQUEST FOR PRODUCTION NO. 20: Documents indicating when you may expect to receive distribution of the any estates or trusts.

REQUEST FOR PRODUCTION NO. 21: Documents indicating the amount of your expected interest in any trusts or estates.

REQUEST FOR PRODUCTION NO. 22: Federal and state tax returns of any and all types on any trusts and or estates in which you are a beneficiary or distribute.

REQUEST FOR PRODUCTION NO. 23: Documents indicating the benefits you received during this marriage from all trusts and estates.

REQUEST FOR PRODUCTION NO. 24: Documents indicating the benefits you received during this marriage from your parents or from their respective businesses. Specifically, any documents or cancelled checks evidencing tax free gifts received by your parents over the course of the marriage.

REQUEST FOR PRODUCTION NO. 25: All account statements and other documents pertaining to any individual or marital debts held in either your and/or your spouse’s name

REQUEST FOR PRODUCTION NO. 26: Please submit all statements and other documents from January 1, 2006, to the current date related to all charge accounts in your name or in which you have authority to use.

REQUEST FOR PRODUCTION NO. 27: All pleadings, orders, judgments and settlement documents concerning any administrative, civil and/or criminal litigation which you have been involved in.

REQUEST FOR PRODUCTION NO. 28: Certified, signed or otherwise authenticated copies of all written or recorded reports or statements by expert or other witnesses rendered by you, to your attorneys, or to those employed by or on behalf of you or your attorneys in relation to this case or the documents sought to be produced by this Request for Production.

REQUEST FOR PRODUCTION NO. 29: All documents or exhibits you intend to introduce or refer to at trial.

REQUEST FOR PRODUCTION NO. 30: All documents reviewed to prepare your Answers to Interrogatories in this case.

REQUEST FOR PRODUCTION NO. 31: Any and all notes letters, e-mails or other correspondence that you contend were exchanged between you, and the Petitioner or anyone that you believe was receiving the information on behalf of Petitioner and all other communications that you contend are, in any way relevant to any issue herein.

REQUEST FOR PRODUCTION NO. 32: Any and all statements obtained by you from any witness herein, whether said statement has been mechanically or stenographically recorded.

REQUEST FOR PRODUCTION NO. 33: Any document that you contend verifies, confirms or otherwise evidences any expense you claim to pay in your financial affidavit.

REQUEST FOR PRODUCTION NO. 34: Any still photograph that you contend depicts the likeness or image of either the Petitioner or Respondent, or any other person or thing which photography you contend to represent information which is relevant to any contested issue of fact herein.

REQUEST FOR PRODUCTION NO. 35: Please produce any and all evidence you have supporting your claim of any and all pre-marital assets you brought into the marriage or those you claim are not part of the marital estate.

REQUEST FOR PRODUCTION NO. 36: Please produce a complete listing of what you feel would be a fair and equitable division of the marital property.

REQUEST FOR PRODUCTION NO. 37: All documents showing or tending to prove or pertaining to your employment, including without limitation wages, salaries, bonuses, stock options, commissions, earnings, employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind, credit union account, pension plans, stock funds, and other benefits or deductions of any kind which are, were previously, or which may be in the future paid available, accepted, rejected, credited, offered or withheld for any purpose by any individual, agency, department, company or otherwise, or to which you are, were or may become entitled in the future.

REQUEST FOR PRODUCTION NO. 38: All journals, diaries, documentation, or other written communication that you have prepared that report the facts of any occurrences or opinions held by you or other information that has been prepared in anticipation of litigation or that has been presented to your attorney in preparation for trial.

REQUEST FOR PRODUCTION NO. 39: For each Facebook account maintained by you, please produce your account data for the period of January 1, 2005, to present. You may download your Facebook data by logging onto your Facebook account, selecting the Security Lock in the top right hand portion of your screen. Click on “See More Settings”. Then click on General. Then click on Download a copy of your Facebook data. Facebook will then archive your data and e-mail it to you in digital format for download.

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ATTORNEY FOR PETITIONER

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| **CERTIFICATE OF SERVICE** | | | | | | |
| The undersigned certifies that the foregoing instrument was served upon all parties to the above cause or to each of the attorneys of record herein at their respective addresses disclosed on the pleadings on October 18, 2018. | | | | | | |
| By |  | U.S. Mail | |  | FAX |  |
|  |  | Hand Delivered | |  | E-Mail |  |
|  |  | Certified Mail | |  | Other: |  |
| Signature: | | |  | | | |
|  | | |  | | | |

Original to:

Respondent and/or Respondent’s Attorney