

**IN THE THIRD CIRCUIT COURT FOR DAVIDSON COUNTY, TENNESSEE  
AT NASHVILLE**

_____	)	
<b>Plaintiff,</b>	)	
	)	<b>DOCKET NO.</b>
<b>vs.</b>	)	
	)	
	)	
_____	)	
<b>Defendant.</b>	)	

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**\_\_\_\_\_ FIRST REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO \_\_\_\_\_**

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The following Requests for Production of Documents are propounded by the undersigned attorney on behalf of his/her client in accordance with the Tennessee Rules of Civil Procedure and the applicable rules of Court to be answered under oath in the time prescribed by law. These Request for Production of Documents are continuing in nature and require you to file supplementary answers if you obtain further or different information before trial.

**I. DEFINITIONS**

For the purposes of these Requests for Production of Documents, the following definitions shall apply:

1. "You," "Your," or "Yourself" refers to the \_\_\_\_\_, to which these Requests for Production of Documents are directed, each of his agents, officers, representatives, affiliates, employees, attorneys, predecessors in interest, or any person or persons acting for or on behalf of him.

2. "Person" means any natural individual in any capacity whatsoever, corporations, partnerships, or governments (or agencies thereof), quasi-public entities, proprietorships, and all other forms of legal entities.

3. "Plaintiff" and "Counter Defendant", shall refer individually and collectively to \_\_\_\_\_, each of his agents, officers, representatives, affiliates, employees, attorneys, predecessors in interest, or any person or persons acting for or on behalf of him.

4. "Defendant" and "Counter Plaintiff" shall refer to\_\_\_\_\_.

5. "Communication" shall mean any oral or written utterance, notation or statement of any nature whatsoever, however transmitted, including, but not limited to, correspondence, conversations, dialogues, discussions, interviews, e-mails, consultations, agreements and other understandings among or between two or more persons.

6. "Document" shall mean every writing or record of every type and description that is or has been in your possession, custody or control, or of which you have knowledge, including, but not limited to, videotapes, photographs, notes, letters, memoranda, books, magazines, notebooks, diaries, papers, agreements, contracts, invoices, analysis, transcripts, correspondence, telegrams, drafts, data processing discs or tapes, instructions, announcements, e-mails, and sound recordings and transcripts thereof. "Document" also means all copies which are not identical to the original, such as those bearing marginal comments, alterations, or other notations not present on the original document as originally written, typed, or otherwise prepared.

7. "Date" means the exact date, month, and year, if ascertainable, if not, the closest approximation that can be made thereto by means of relationship to other events, locations, or matters.

## **II. INSTRUCTIONS**

1. Each question is addressed to your personal knowledge, and requires you to furnish in your answer all information in your possession, custody or control, including all information in

the possession, custody or control of anyone acting in cooperation or in concert with you or on your behalf, including experts consulted or retained by you. Without limitation of the term “control” as used in the preceding sentence, a document is deemed to be in your control if you have the right to secure the document or a copy thereof from another person or entity having actual possession thereof.

2. In the event that any document required to be identified in response to any question was but is no longer in your possession, custody or control, specify:

- a. What disposition was made of the document, and why.
- b. The dates on which such disposition was made.
- c. The person or persons now in possession, custody or control of the document.
- d. The most accurate summary of the document’s contents available under the circumstances.

3. To the extent that a full and complete answer to any of the following Requests for Production of Documents would require a repetition of information given in response to any other of the following Requests for Production of Documents, a cross-reference to the specific response in which such information is fully set forth may be used in lieu of such repetition.

4. For each answer given to each question, separately identify each person responsible for providing the information for the answer, and for formulating the answer, and separately identify each document or other source relied on in formulating the answer.

5. Should you refuse to respond to any of these Requests, in whole or in part, please describe the nature of the information withheld and the basis for your refusal to provide the same, including a sufficiently detailed explanation of any claim of privilege or work product to permit the Court to adjudicate the validity of your claim.

6. If you cannot respond to any of these Requests, in whole or in part, after exercising due diligence to secure the information to do so, you should answer to the extent possible, specifying those items that you are unable to respond to and specifying the steps you have taken to obtain the information to respond to the same.

7. The singular form of a word, for example “document” or “person”, shall refer to the plural as well, and words in the masculine gender also include the feminine gender.

8. These Requests for Production of Documents shall be deemed continuing so as to require amendment to your answers in accordance with Rule 26 of the Tennessee Rules of Civil Procedure in the event new or additional information is acquired.

### **III. REQUESTS FOR PRODUCTION OF DOCUMENTS**

- 1. Please provide copies of all joint or single federal and state income tax returns filed by you personally, including all W-2's, Forms 1099, K-1's or other documents submitted with the return, and all other attachments, schedules, and worksheets used in the preparation of the return, for the two (2) years prior to the filing of the divorce complaint and any tax returns filed since the filing of the complaint to present.**
  
- 2. Please provide all W-2's, Forms 1099, K-1's, last five (5) pay stubs, documentation of cash advances on credit cards or lines of credit, loans to you, distributions, interest, dividends, payments on promissory notes held by you, rental income, income from investments, consulting fees, disability, retirement and all other evidence of income received by you, for all time periods for which income tax returns have not yet been filed, through the date of your answer.**

- 3. Please provide copies of all federal income tax returns of every corporation, limited liability company, partnership, limited partnership, joint venture or other business entity of any nature (excluding publicly held corporations) in which you own, or have owned an interest from the two (2) years prior to the filing of the divorce complaint to present and together with copies of all documents, attachments, schedules and worksheets used in preparation of and/or filed with each such tax return.**
  
- 4. Please provide a copy of your most recent statement from the Social Security Administration, showing your history of earned income. This may be obtained online at: <https://www.ssa.gov>**
  
- 5. Please provide copies of all written employment agreements between you and each employer you have had for the two (2) years prior to the filing of the divorce complaint to present.**
  
- 6. Please provide copies of all documents evidencing fringe benefits to which you are entitled from your current employer, including, but not limited to, medical, dental, vision, and/or life insurance, travel and expenses accounts, allowances, bonuses, stock option plans, and any and all other fringe benefits.**
  
- 7. Please provide documentation showing the amount of the monthly premium for your major medical or health insurance coverage, as well as the length of time for conversion of health and/or dental insurance from a group policy to an individual policy under the Federal COBRA Statute.**

- 8. Please provide documents from your medical, dental, vision, and hospitalization insurance provider reflecting the cost of COBRA premiums for your spouse, as well as the cost of the monthly premiums to insure your minor child(ren) after this divorce action (if applicable).**
  
- 9. Please provide copies of all bank statements, canceled checks, end-stub and check registers for all checking accounts, business or personal, including, but not limited to, those held in banks, credit unions, or other financial institutions maintained by you, or which you now have, or have had, signatory privileges, to which you have made deposits, from which you have made withdrawals from the two (2) years prior to the filing of the divorce complaint to present.**
  
- 10. Please provide copies of all savings statements for any savings accounts, business or personal, including, but not limited those held in banks, credit unions or other financial institutions account maintained by you, or which you now have, or have had, drawing privileges, to which you have made deposits, from which you have made withdrawals from the two (2) years prior to the filing of the divorce complaint to present.**
  
- 11. Please provide copies of all statements of account for any and all liquid asset accounts of any type, including, but not limited to, money market accounts, mutual fund accounts, annuities, ready asset accounts, cash management accounts, and brokerage accounts, maintained by you, or which you now have, or have had, drawing privileges,**

**to which you have made deposits, from which you have made withdrawals, for both personal and business purposes, from the two (2) years prior to the filing of the divorce complaint to present.**

- 12. Please provide monthly account statements, CSV files, or other transaction records for all personal pay applications and/or peer-to-peer money transfer applications or accounts that you have created and/or used from two (2) years prior to the date of filing this divorce complaint to the present (this includes but is not limited to Venmo, Pay Pal, Zelle, Cash App, etc.), including any such account that exists in your name, either jointly or individually. Please note that, for the purposes of this request, “used” means “sent and/or received money.”**
  
- 13. Please provide monthly account statements for all Crypto Currency Exchange accounts or non-fungible-tokens (“NFT”) that you have created and/or used from two (2) years prior to the filing of the complaint for divorce to the present (this includes but is not limited to Coin Base, Crypto.com, Cash App, BitMart, etc.), including any such account that exists in your name, either jointly or individually. Please note that, for the purposes of this request, “used” means “purchased, sold, or exchanged Crypto Currency or NFTs.”**
  
- 14. Please provide monthly account statements for any and all Sports Gambling accounts / sportsbooks that you have created and/or used for two years prior to the filing of the complaint for divorce through the present (this includes but is not limited to FanDuel, Caesar’s Sportsbook, Draft Kings Sportsbook, etc.), including any such account that**

exists in your name, either jointly or individually. Please note that, for the purposes of this request, “used” means “deposited and/or withdrawn money; and/or placed any bet.”

15. Please provide copies of all statements of account for any individual retirement accounts, pension accounts, or any deferred compensation plans, 401k plans, 403B plans or tax-sheltered accounts in which you have or have had any interest from the two (2) years prior to the filing of the divorce complaint to present.

16. For all retirement accounts including, but not limited to, individual retirement accounts, 401k plans, 403B plans, thrift savings plans, pension plans or employee stock option plans in existence on the date of this marriage, please provide a copy of any statement, document, or other evidence of the value of said asset or benefit at the time of this marriage.

17. Please provide copies of all personal and business certificates of deposit, money market certificates, treasury bills, savings bonds, or like monetary assets owned by you or in which you now have, or have had, an interest from the two (2) years prior to the filing of the divorce complaint to present.<sup>18.</sup> If not otherwise provided herein, for each and every SEP, KEOGH, 401(k), Roth IRA or other retirement account which you own and for each and every plan in which you participate, qualified under the Internal Revenue Code of 1986 as amended, or unqualified, please provide a copy of all plan documents including, any plan or trust, the last two (2) years' Form 5500's filed on behalf of the plan, the most recent annual statement that you have received, a copy of the Summary Plan Description, the plan account and/or statement of your

**accrued benefits as of the present date and documents evidencing the monthly amount you expect to receive at retirement, together with all beneficiary designations which you have made.**

**18. Please provide copies of all documents evidencing stock, bonds, or other securities registered in your name or in the joint names of the parties or in which you have or have had any interest from the two (2) years prior to the filing of the divorce complaint to present, as well as all documents evidencing any past, present, or future rights which you may have with your employer or otherwise to stock, vested and unvested, including stock awards, stock options, performance shares, restricted stock, and any similar instrument evidencing an interest with your current or any former employer or otherwise.**

**19. Please provide copies of all stock certificates, partnership agreements, and any other documents evidencing an ownership interest in any business enterprise whatsoever, including, but not limited to, corporations, limited liability companies, partnerships, limited partnerships, joint ventures or sole proprietorships from the two (2) years prior to the filing of the divorce complaint to present.**

**20. Please provide copies of all appraisals, reports, records or other documents evidencing the value of any corporation, limited liability company, partnership, limited**

**partnership, joint venture, sole proprietorship or other business entity of any nature whatsoever in which you have or have had an interest from the two (2) years prior to the filing of the divorce complaint to present.**

- 21. Please provide copies of all documents related to any debt (excluding credit cards) you have incurred or which was in existence from the two (2) years prior to the filing of the divorce complaint to present and copies of the latest statements showing the current balance owed as to each debt.**
  
- 22. Please provide copies of the monthly statements of account for all credit cards and charge accounts, business or personal, in your name jointly or individually, on which you now have, or have had, charge privileges from the two (2) years prior to the filing of the divorce complaint to the present.**
  
- 23. Please provide copies of all documents reflecting any loans made by you to other persons or entities during the marriage which were outstanding as of the filing of the divorce complaint.**
  
- 24. Please provide copies of all documents reflecting any loans made to you individually or to any business entity through which you were doing business from any other persons or entities during the marriage and which loans were outstanding at the time of the filing of the complaint for divorce.**

- 25. Please provide copies of all financial statements prepared by you or on your behalf and/or submitted to any third parties or institutions from the two (2) years prior to the filing of the divorce complaint to present.**
  
- 26. Please provide copies of all life insurance policies currently in force on your life and all beneficiary designation(s).**
  
- 27. Please provide copies of all documents evidencing the transfer, sale, conveyance, gift or other disposition of any and all assets having a value in excess of \$1,000.00 owned by you or in which you have, or have had, an interest from the two (2) years prior to the filing of the divorce complaint to the present.**
  
- 28. Please provide copies of all documents which reflect the purchase price of, cost of improvements to, debt associated with, liens attached to, security interests in, leases associated with, and the value of all real property in which you claim an interest.**
  
- 29. Please provide copies of all current leases for which you are liable.**
  
- 30. Please provide copies of documentation of payments of property taxes on all parcels of real estate titled in your name, whether individually or jointly with your spouse, from the two (2) years prior to the filing of the divorce complaint to present.**
  
- 31. Please provide copies of any will or trust agreement of which you are a beneficiary or an heir as well as any copies of any deeds, wills, trusts, or other documents, instruments, or other physical evidence which supports any claim of yours to have**

**received property by gift or inheritance from the two (2) years prior to the filing of the divorce complaint to present.**

**32. Please provide copies of all documents which reflect any asset with a value greater than \$1,000 owned by you at the time of the marriage, the disposition of such assets, including the sales price or consideration (or percentage thereof) paid to or received by you if disposed of, the current existence of such assets and the fair market value of any such assets.**

**33. Please provide a copy of any appraisal, report or summary of anticipated testimony from any expert you intend to introduce at trial stating all known facts and opinions held by said expert including the subject matter on which the expert is expected to testify, the substance of facts and opinions to which the expert is expected to testify and a summary of the grounds for each opinion.**

**34. For any real estate owned by you or in which you claim an interest at the time of this marriage, please provide a copy of the appraisal, tax assessor's appraisal, or any other documentation evidencing the fair market value of such property at or about the time of the marriage and any indebtedness thereon as well as a copy of any appraisals on said property from the two (2) years prior to the filing of the divorce complaint to present.**

**35. Please provide copies of all appraisals, statement of opinions, records and other documentation relied upon by you in determining the value of any personal property**

**in which you maintain an interest.**

**36. Please provide copies of all appraisals, valuations, records or other documentation relied upon by you in determining the value of any corporation, limited liability company, partnership, limited partnership, joint venture, sole proprietorship, or any other business entity of any kind in which you maintain an interest.**

**37. Please provide copies of all documents relating to the disposition of any asset with a value greater than \$1,000, business asset and/or enterprise, owned by you, or in which you had an interest within the last two years of the marriage to present.**

**38. Please provide copies of all documents which reflect any judgments in favor of you in any action by or against you at any time during the marriage.**

**39. Please provide copies of all complaints and petitions filed on your behalf or against you personally and/or on behalf of or against any business entity in which you have an interest, unresolved or settled, compromised or adjudicated within two (2) years prior to the filing of the divorce complaint to present.**

**40. Please provide copies of all audio or video recordings, including video recordings, audio recordings, digital records, and transcripts of recordings made by you or someone on your behalf of conversations between you and your spouse, or between your spouse and any other person during the marriage which you believe are germane to any issue in controversy in this pending action.**

- 41. Please provide copies of any notes, calendars and/or journals which pertain to you or your spouse and which you believe to have probative value to the issues in controversy in this pending action.**
  
- 42. Please provide copies of all photographs, cards, e-mails, texts or other physical evidence which you believe demonstrate any inappropriate conduct by your spouse, or on which you intend to rely as grounds for divorce in this cause, or as an affirmative defense to your own actions.**
  
- 43. Please provide copies of all documents relating to any interest which you have in any patent, copyright, invention or royalty.**
  
- 44. Please provide copies of all documents which show any right, interest or prospect of pecuniary advantage under any contract or interest in any lawsuit.**
  
- 45. Please provide all copies of any documentation relating to any surveillance upon your spouse, conducted during the marriage by any individual, whether gratuitously or by hire, including, but not limited to, reports, notes, findings, photographs, audio or video recordings, digital recordings and the like. .**
  
- 46. Please provide copies of any and all documents evidencing your membership in any country club, golf club, tennis club or swim club.**

- 47. Please provide copies of any and all documentation of frequent flyer miles, reward points, credit card points, or other such accumulated points in your name.**
- 48. Please provide a copy of your current resume or curriculum vitae.**
- 49. A copy of your most recent credit report, which can be obtained for free at [www.annualcreditreport.com](http://www.annualcreditreport.com).**
- 50. Please provide copies of all statements received from telephone service providers or cell phone bills and other telephone or cell phone records in connection with any and all telephones, cellular or otherwise, that you use, have used, or to which you have had access, whether titled in your name or otherwise, from the two (2) years prior to the filing of the divorce complaint to present, showing phone numbers for all incoming and outgoing calls, and the time, date and duration of each call.**
- 51. Produce all documents and electronically stored information reflecting, relating to, or generated through the use of Artificial Intelligence, including but not limited to ChatGPT or other generative AI platforms, that concern, reference, analyze, summarize, evaluate, draft, revise, or otherwise pertain to:**
- a. the facts, allegations, defenses, or issues in this action;**
  - b. any party to this action;**
  - c. communications regarding this action;**

**d. pleadings, discovery responses, affidavits, witness statements, timelines, summaries, legal theories, or damages analyses related to this action.**

**This Request includes, without limitation: AI prompts, inputs, or questions submitted; AI-generated outputs or responses; Saved or exported chat histories or conversation logs; Drafts or documents created or revised using AI; Metadata identifying dates, times, accounts, or platforms used. For purposes of this request, “Artificial Intelligence” or “AI” means any computer system, software, application, platform, or tool that uses machine learning, large language models, or generative algorithms to analyze data, generate text, provide recommendations, or assist in decision-making, including but not limited to ChatGPT, OpenAI tools, Google Bard/Gemini, Microsoft Copilot, Claude, or similar platforms. “AI Records” means all prompts, inputs, queries, instructions, conversations, responses, outputs, revisions, saved chats, chat histories, metadata, account logs, exports, downloads, drafts, summaries, or documents created, reviewed, modified, or generated using AI.**

**REQUESTS FOR PRODUCTION OF DOCUMENTS SHALL BE  
SUPPLEMENTED AT LEAST 45 DAYS PRIOR TO TRIAL.**

Respectfully submitted,

\_\_\_\_\_  
(Attorney’s Name)(BPR#)  
(Attorney’s Address)  
(Attorney’s Telephone Number)

*Attorney for* \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was mailed, first-class, U.S. Mail, postage prepaid on this the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_ to the following:

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(Name of Attorney)