

New!

Hit Them Hard in the First Discovery Round

Litigation favors the quick and forceful attacker, yet limited time prevents many attorneys from striking aggressively at the outset

Staying on the offensive is a proven technique for achieving a strong settlement position.

When you force your opponents to spend their limited time reacting to your moves, you keep them from advancing their cases. You buy yourself time to make your next moves, push your case forward, and stay on the attack.

To attack aggressively at the outset of discovery, begin with the pattern documents found in Rogge Dunn's new *Triple-Threat Discovery Forms*. Focusing on employment, business, insurance, and personal injury cases, this collection creatively weaves together interrogatories, requests for admissions, and requests for production into a powerful first-strike discovery document. For example, you receive:

Triple-Threat to...

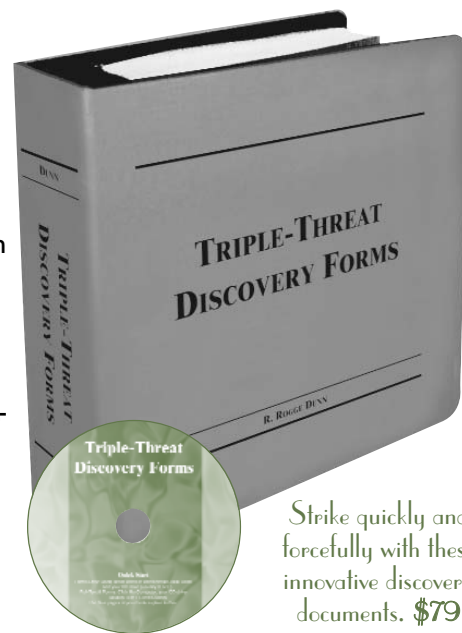
Defendant-Employer
Defendant in Sex Discrimination
Defendant in Workers' Compensation
Retaliation
Plaintiff in Sexual Harassment and Firing
Plaintiff in Race and Age Discrimination
Firing
Defendant-Manufacturer in Products Case
Defendant Insurance Carrier Denying Coverage
Defendant Tenant in Slip and Fall
Personal Injury Plaintiff
Plaintiff Claiming Negligent Inspection

Deposition Outlines for...

Defendant in Trade Secrets Case
Defendant in Employment Case
Defendant in Sexual Harassment Case
Plaintiff in Employment Case
Plaintiff in False Imprisonment
Defendant in Products Liability
Defendant in Defective Alarm/Security
Fire Expert
Liability Expert

Bonus Discovery Forms

Memo Detailing Procedures for Investigation of Discrimination/Harassment
Notice Letter to Preserve Evidence in Employment Case



Strike quickly and forcefully with these innovative discovery documents. \$79

Plaintiff's Deposition Duces Tecum in Employment Case
Letter to Corporate Client About Ways to Maintain Attorney-Client Privilege During Investigation
Response and Objections to Request for Production of Documents
Deposition Preparation of our Expert
Motion to Quash Deposition Subpoena Duces Tecum

4 Ways Pre-Drafted Discovery Documents Can Help

- 1. Reduce drafting time.** Whether you copy and paste selected questions from the free companion CD, dictate from the book, or customize whole forms, using pre-drafted questions and requests can save you hours.
- 2. Elicit more complete answers.** The comprehensive definitions and clear, direct phrasing of the questions and requests will reduce the number of objections and non-responsive answers you receive.
- 3. Avoid omissions.** The extensive documents in *Triple-Threat Discovery Forms* will bring to mind fertile topics for exploration, and the detailed pattern questions and requests will highlight the best areas of inquiry.
- 4. Produce quality work.** By starting with questions and requests that have already been used and revised several times, your first draft will read like a polished final copy.

See inside for complete list of forms, author bio, and sample pages...

59 Bonus Discovery Forms

Triple-Threat Discovery Forms also contains deposition outlines, model letters, pattern interview questions, intake questionnaires, and other discovery aids. For example:

Depositions

- 11 deposition outlines
- Pointers for clients
- Preparation of experts
- Preparation of witnesses

Letters

- Letter to corporate client re ways to maintain attorney/client privilege during client's investigation
- Doctor's protection
- Requesting doctor reduce lien
- 3 notices to preserve evidence

Plus

- 2 protective orders
- 3 pattern interviews
- 2 intake questionnaires
- Interview of potential expert witness
- Memo to paralegal re items needed for hearings and depositions
- Agreement regarding production of documents for settlement purposes only
- And many more

About the Author

R. Rogge Dunn is a trial lawyer who loves trying cases. He has litigated complex business, employment, personal injury, and insurance disputes throughout the country, and has tried cases to a jury verdict in four states.

Although approximately two-thirds of his practice involves representing corporate defendants, Mr. Dunn has won more than \$175 million in settlements and verdicts for his plaintiff clients, including million dollar verdicts in Texas and Louisiana.

Two of Mr. Dunn's closing arguments were recorded for the Million Dollar Arguments series. He has been recognized by *D Magazine* as one of the best lawyers in Dallas. He regularly appears as a legal commentator for television and radio stations, and presents legal seminars four to five times a year.

Mr. Dunn taught at Southern Methodist University as an adjunct professor for 14 years, clerked for the Honorable Reynaldo Garza of the U.S. Fifth Circuit Court of Appeals, and served as a Note Editor of the *Texas Law Review*.

He is a partner at Clouse Dunn Hirsch in Dallas, and may be reached at rdunn@trialtested.com or 214-220-0077. If you simply wish to order his book, please contact the publisher at 800-440-4780 or www.jamespublishing.com.

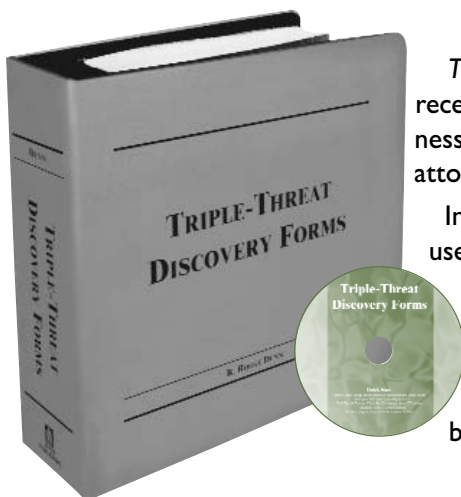


About the Book and CD

Triple-Threat Discovery Forms contains 750 letter-sized pages in a sturdy 3-ring binder. You receive 90 discovery forms, many over 30 pages long, for personal injury, employment, business, and insurance cases. All have been drafted by a sophisticated and successful veteran trial attorney with a wide-ranging practice. They have been tested by years of usage.

Included at no extra charge is an intuitive, full-text CD which requires no installation before use. It may be searched by key word, case name, or topic. You may also open and modify any of the CD's forms simply by using your favorite word processor; you need not work with the CD's search program.

\$79 buys the book and CD. The book is updated annually for \$59 with replacement pages and a new CD. Both the book and its update are sold on a 30-day trial basis, and may be returned if not to your liking. The update service may be cancelled at any time.



(800) 440-4780 or www.JamesPublishing.com

90 Forms

General Triple-Threat

Plaintiff's Standard Instructions and Discovery for Plaintiff's Product Liability Cases, Plaintiff's Triple Threat to Defendant-Manufacturer, Products Personal Injury Case, Plaintiff's First Interrogatories and Request for Production to Tenant in Slip and Fall, Defendant's Triple Threat to Plaintiff Claiming Negligent Inspection, Defendant's Triple Threat to Personal Injury Plaintiff, Defendant's Triple Threat to Personal Injury Plaintiff's Wife, Defendant's Triple Threat to Heirs in Wrongful Death Case Against Drug Manufacturer, Plaintiff's Triple Threat to Defendant Insurance Carrier Denying Coverage, Defendant's Triple Threat to Plaintiff in Bad Faith Case

Employment Triple-Threat

Plaintiff's Standard Triple-Threat Discovery to Defendant-Employer, Plaintiff's Second Request for Production to Age Discrimination Defendant, Plaintiff's Second Request for Admissions, Plaintiff's Second Interrogatories, Plaintiff's Third Request for Production to Defendant in Age

Discrimination, Plaintiff's First Triple Threat to Defendant in Age Discrimination, Plaintiff's First Triple Threat to Defendant in Sex Discrimination

Plaintiff's Triple Threat to Defendant-Employer in Worker's Compensation Retaliation, Plaintiff's Triple Threat to Defendant-Employer in Sexual Harassment, Plaintiff's First Request for Production to Defendant-City in Whistleblower Case, Plaintiff's Triple Threat to Defendant-Company Stealing Trade Secrets, Plaintiff's Triple Threat to Defendant Former Employee Stealing Trade Secrets

Defendant's Standard Instructions and Discovery, Defendant's Standard Triple Threat Discovery in Employment Cases, Defendant's Triple Threat to Plaintiff in Race and Age Discrimination Firing, Defendant's Triple Threat to Plaintiff in Sexual Harassment and Firing, Defendant's Triple Threat to Plaintiff in Chapter 451, Defendant's Triple Threat to Plaintiff in Worker's Compensation Case

Construction Triple-Threat

Plaintiff's Triple-Threat Discovery to Construction Services Provider, Plaintiff's Triple Threat to Employer of Construction Services Provider, Defendant's Second Set of Triple Threat Discovery to Defendant Service Provider

General Discovery

Interview of Potential Expert Witness, Memo to Paralegal About Items Needed for Hearings and Depositions, Letter to Deponent About Review and Signature of Deponent, Eason Letter to Client About Answering Discovery, Letter to Cor-

FORM 550: LETTER TO CORPORATE CLIENT ABOUT WAYS TO MAINTAIN ATTORNEY-CLIENT PRIVILEGE DURING CLIENT'S INVESTIGATION

Date: _____

(Name) _____

(Address) _____

Re: _____

Our File No. _____

Dear _____:

As we discussed yesterday, I want to help insure that our communications and the documentation relating to the _____ are organized in such a way that we are able to preserve work product and attorney-client confidentiality and privileges when this claim ultimately comes to suit. The intent of this letter is to provide you with a brief summary of the anticipation of litigation privilege and the analysis that a court will likely undertake in the event that the plaintiffs attempt to obtain copies of documentation contained in your working files as they relate to the sale of _____.

In order to protect the confidentiality of work product completed prior to the filing of suit, we must be able to establish that the work product was prepared and assembled in anticipation of litigation or trial.¹ In order to make this determination, a court will apply a two-prong test which is as follows:

1. OBJECTIVE TEST

First the court must determine whether a reasonable person, based on the circumstances at the time of the investigation, would have anticipated litigation. "Eminence" of litigation is not a factor; the objective prong is satisfied when a reasonable person would conclude from the severity of the accident and other circumstances surrounding it that there is a substantial chance that litigation will ensue.²

2. SUBJECTIVE TEST

Second, the court must make a subjective determination whether the party resisting discovery believed in good faith there was a substantial chance that litigation would follow and conducted the investigation for the purpose of preparing for litigation. This part of the test looks to the defendant's reaction to circumstances surrounding the occurrence.³

The circumstances surrounding the anticipated sale of _____ and the pending claim made by _____ creates a unique situation which could pose problems in protecting work product which is related to our preparation for the expected lawsuit filed on behalf of _____ and possibly others as opposed to the work which is being conducted in connection with the sale of _____. In essence, there is a dual track of decision making which is ongoing currently. However, both tracks will necessarily utilize some of the same information concerning the _____. It is for this reason that we have suggest-

¹See *Humphreys v. Caldwell*, 888 S.W.2d 469, 471 (Tex. 1994).

²See *Hart Tank Co. v. Brentner*, 851 S.W.2d 193, 203-04 (Tex. 1993).

³*Hart Tank*, 851 S.W.2d at 204.

5-10

GENERAL TRIPLE-THREAT FORM 120: PLAINTIFF'S TRIPLE-THREAT TO DEFENDANT-MANUFACTURER, PRODUCTS PERSONAL INJURY CASE

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS, FIRST SET OF INTERROGATORIES AND FIRST REQUEST FOR PRODUCTION OF DOCUMENTS PROPOSED TO _____

TO: Defendant _____, by and through its counsel of record, _____

Pursuant to the Federal (Your state) Rules of Civil Procedure, Plaintiff, _____ (hereafter "Plaintiff"), submits to you the following Requests for Admissions, Interrogatories and Request for Production of Documents to be answered separately as set forth in the instructions, and with the Interrogatories to be answered under oath.

INSTRUCTIONS

A. Requests for Admissions
You must deliver a written response to said Requests for Admissions to opposing attorney within the time prescribed by the Federal (Your state) Rules of Civil Procedure.

B. Interrogatories
Answer the attached Interrogatories separately and accurately in writing and under oath. You must deliver an original, sworn and executed response to said Interrogatories to opposing attorney within the time prescribed by the Federal (Your state) Rules of Civil Procedure or within such further time as the Court may allow on motion and notice. If the answer to any interrogatory may be derived or ascertained from your business records, and the burden of deriving the answer would be substantially the same for Plaintiff and you, you may specify the records from which the answer may be obtained. However, that specification must be in sufficient detail to allow opposing attorney to locate and identify the answers as easily as you can, and must include a reasonable opportunity to examine, audit or inspect such records and make copies, compilation, abstracts or summaries.

C. Production Request
Your written responses to this Request for Production shall state, with respect to you are reminded that your written responses to this Request for Production of documents to be permitted as requested, except to the extent that you make objections in writing to particular items or categories. Your written responses and/or objections, if any, shall be served on the opposing attorney within the time prescribed by the Federal (Your state) Rules of Civil Procedure. You are requested to attach copies of all items that are subject to this Request for Production of documents to your written responses to this Request for Production, or to make such items available for inspection and copying in your offices or your attorney's offices at the expiration of the time noted above, if you contend that you may partially or entirely withhold a requested document because of a rule, privilege, immunity, or other reason, for each document partially or entirely withheld provide the following infor-

1-9

Client letters.
You receive letters covering deposition preparation, evidence preservation, doctor protection, and attorney-client privilege.

Over 30 pages each.
The triple-threat forms are sizable documents filled with hard-hitting requests and challenging questions. They provide your opponent little wriggle room.

EMPLOYMENT TRIPLE-THREAT FORM 2:10

FORM 2:10: PLAINTIFF'S STANDARD TRIPLE-THREAT DISCOVERY TO DEFENDANT-EMPLOYER [DIS.575]

(Style of Case)

PLAINTIFF'S FIRST REQUESTS FOR ADMISSIONS, FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO DEFENDANT

TO: Defendant, _____, by and through its attorney of record/registered agent for service of process _____

[INSERT STANDARD INSTRUCTIONS & DEFINITIONS FOR A PLAINTIFF: DIS.581]

REQUESTS FOR ADMISSIONS

ADMISSION NO. 1: Admit that _____ is an individual covered by Title VII/Age Discrimination in Employment Act/Section 1983/[insert applicable statute].
RESPONSE: _____

ADMISSION NO. 2: Admit that you employ more than 500 employees.
RESPONSE: _____

ADMISSION NO. 3: Admit that at the time _____ became general manager of _____ that he was _____ years of age/a member of a protected class under Title VII.
RESPONSE: _____

ADMISSION NO. 4: Admit that when _____ interviewed Plaintiff, _____ asked Plaintiff _____.
RESPONSE: _____

ADMISSION NO. 5: Admit that at the time that Plaintiff's employment relationship with you ended, that Plaintiff had been employed by you for more than _____ years.
RESPONSE: _____

ADMISSION NO. 6: Admit that _____ demoted Plaintiff from _____ to _____ and that _____ replaced Plaintiff as _____ of _____.
RESPONSE: _____

ADMISSION NO. 7: Admit that Plaintiff was demoted from _____ to _____ because of cash flow problems of _____.
RESPONSE: _____

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Employment discovery.

18 triple-threat discovery forms are devoted to employment litigation, including sex harassment and discrimination, workers' compensation retaliation, race and age discrimination, trade secrets theft, and wrongful discharge.

EMPLOYMENT DISCOVERY FORM 7:90

FORM 7:90: PLAINTIFF'S STANDARD DEPOSITION DUCES TECUM TO DEFENDANT IN EMPLOYMENT CASE [P-DIS.362]

EXHIBIT "A"

DOCUMENTS TO BE BROUGHT TO THE DEPOSITION

DEFINITION:
This request does not seek documents generated by your attorneys unless said documents are to be introduced as evidence at trial.

You are hereby requested to bring to the deposition the following documents and tangible things in your possession, custody, or control or in the custody, possession or control of your attorneys, officers, directors, employees, accountants, agents, servants, subsidiaries, physicians, affiliates, and other representatives:

- All documents requested in Plaintiff's First Request for Production of Documents to you, which is incorporated herein for all purposes as if set forth verbatim.
- All written or recorded statements of any person made by you regarding Plaintiff's complaint or that were taken prior to the time you received Plaintiff's attorney's demand letter.
- Please produce all documents which evidence, refer to, or relate to your efforts to comply with laws, or guidelines.
- Please produce all petitions and counterclaims filed in the last _____ years to the present alleging planning of _____ of _____ discrimination.
- Please produce all brochures, pamphlets, codes of conduct, instructions, training information, policies or procedures that you distributed to your employees, officers, directors, agents, servants, representatives, persons, or entities in the last _____ years regarding your policy regarding _____ discrimination, or the treatment of (insert protected class member) employees.
- Please produce your complete policy manual, code of conduct, policy statement, employee handbook or any other publication in effect during Plaintiff's employment tenure with you concerning any disciplinary practices.
- Please produce Plaintiff's entire personnel file.
- Please produce _____'s entire personnel file.
- Please produce names of all similarly situated employees' entire personnel file.
- Please produce all memos, charges, letters, complaints, grievances or similar documents generated by any of your employees concerning _____'s complaints that _____ discriminated against him/her that were created prior to the date this lawsuit was filed.
- Please produce all memos, charges, letters, complaints, grievances or similar documents generated by any of your employees indicating that Plaintiff discriminated against anyone that were created prior to the date this lawsuit was filed.
- Please produce all minutes, interoffice correspondence, complaints, memos, warnings, studies or other similar documents related in any way to any discussion to discipline, put on probation, or terminate.

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Supporting documents.

A full range of deposition forms is included: preparation of experts and witnesses, internal memos, objections, protective orders, and these case-specific lists of documents requested.

Response and Objections to Request for Production of Documents, Letter Transmitting Discovery Responses, Letter to Client About Verification of Client's Interrogatory Answers, Rule 26 Letter, Protective and Confidentiality Order for Lawsuit, Protective and Confidentiality Order for Production of Documents, Motion to Quash Deposition Duces Tecum, Letter Transmitting Sworn Statement to Witness for Signature

porate Client About Ways to Maintain Attorney-Client Privilege During Client's Investigation, Agreement to Produce Documents for Settlement Purposes Only, Non-waiver Agreement for Opposing Counsel to Examine Documents to Determine if Voluntary Production, Rule 11 Agreement for Production of Documents Waiving Right to Future Documents

Release of Medical Records, Release of Payroll Records, Release for Veteran's Administration, Victim's Letter Request to District Attorney for Records, Parent's Authorization for Child's Medical Records, Plaintiff Client's Authorization for Release of Specific Medical Records, Letter to Plaintiff Client About Limited Authorization, Release of Transcript and Other Educational Records, Affidavit Proving Up Medical Records

Deposition Outline for Corporate Representative, Deposition Outline for Custodian of Records in Federal Court, Outline of Deposition Pointers for Client, Deposition Instructions, Deposition Preparation of our Expert, Direct Questions to be Propounded to a Custodian of Records in Federal Court, Agreement for Service of Pleadings, Discovery and Documents by Fax

Personal Injury Discovery

Case Intake Questionnaire for Mold Cases, Notice Letter to Preserve Evidence in Personal Injury Case, Doctor's Protection Letter, Letter Requesting Doctor Reduce Lien, Oral and Video Deposition Duces Tecum Instructions and Definitions for All Employment Cases, Defendant's Deposition Duces Tecum to Custodian of Medical Records

Deposition Outline for Liability Expert, Deposition Outline for Fire Expert, Depo Outline to Depose Defendants in Products Liability/Services Case, Deposition Outline Depose Defendants in Defective Alarm/Security Case, Sworn Statement About Accuracy of Photos

Insurance Discovery

Deposition Duces Tecum to Corporate Representative Most Knowledge About Denial of Insurance Coverage

Employment Discovery

Employment Intake Questionnaire, Memo Detailing Procedures for Investigation of Discrimination/Harassment, Pattern Interview of Employee Complaining of Discrimination/ Harassment, Pattern Interview of Employee Accused, Pattern Interview of Possible Witnesses

Notice Letter to Preserve Evidence in a Commercial/ Employment Case, Notice Letter to Preserve Evidence in Employment Case

Defendant's Standard Deposition Duces Tecum to Plaintiff in Employment Case, Plaintiff's Standard Deposition Duces Tecum to Defendant in Employment Case, to Injured Plaintiff, to Defendant City, to Whistleblower, to Corporate Representative Most Knowledge About Theft of Trade Secrets

Deposition Outline to Depose Defendant in Trade Secrets Case, in Employment Case, in Sexual Harassment Case, Deposition Outline to Depose Plaintiff in Employment Case, in False Imprisonment

Deposition Preparation of Defendant Employers' Witnesses in Wrongful Discharge Case, FOIA Request to EEOC, Affidavit Resisting Discovery: Burdensomeness to Produce Personnel Files, Agreed Motion for Issuance of Letter Rogatory, Sworn Statement About Wrongful Discharge, Sworn Statement About Non-Managerial Employee

FORM 5-190 DEPOSITION OUTLINE FOR CORPORATE REPRESENTATIVE [R-DIS.320]

*Court Reporter: Indexed

DEPOSITION OUTLINE - CORPORATE REPRESENTATIVE

AGREEMENT ON DOCUMENTS

DOCUMENTS TO DEPOSITION

- Investigation of Claim
- Statements

INTRODUCTION

Swear in witness

State name

My name/ Zip Code & Location

Ever had deposition taken

Informal setting, typed booklet form

Chance to visit with your lawyer

Under oath — judge and jury

Impachment/perjury penalties

If don't understand — agree to ask to clarify/rewrite

I want everything you know or have heard

Do you understand the term hearsay

Want what you've heard or know from third party

Agree to tell me everything including hearsay

FULL AND COMPLETE

Seeking truth

Whole story

Medications, drugs, illness

5-28

Includes deposition outlines. Speed your deposition preparation and help avoid omissions with these extensive lists of fruitful areas to explore.

GENERAL DISCOVERY FORM 5-260

FORM 5-260: RESPONSE AND OBJECTIONS TO REQUEST FOR PRODUCTION OF DOCUMENTS [R-DIS.401]

_____'S RESPONSES AND OBJECTIONS TO _____'S REQUEST FOR PRODUCTION

TO _____ by and through its attorney of record, _____ COME(S) NOW _____ ("Plaintiff"/"Plaintiffs") ("Defendant"/"Defendants") and file(s) these Responses and Objections to _____(s)'s Request for Production as follows:

DEFINITIONS

- "Respondent(s)" shall mean _____.
- "Respondent(s)' attorney" shall mean _____.
- "Rule or Rules" shall mean the (Your state)'s Federal Rules of Civil Procedure.

GENERAL OBJECTIONS TO EACH AND EVERY REQUEST FOR PRODUCTION

- Plaintiff(s)/Defendant(s) object(s) to responding to any request for production covered by the attorney work product privilege.
- Plaintiff(s)/Defendant(s) object(s) to responding to any request for production concerning information or documents prepared by them in anticipation of the litigation, including Plaintiff(s)/Defendant(s)'s investigation file. Plaintiff(s)/Defendant(s) will produce to their investigation file that existed prior to _____ the date this case was assigned to _____.
- Plaintiff(s)/Defendant(s) object(s) to any request for production concerning information covered by the attorney/client communication privilege.
- Plaintiff(s)/Defendant(s) object(s) to any request for production concerning any request for production covered by the consulting expert exception.
- Plaintiff(s)/Defendant(s) object(s) to any request for production covered by the party communication privilege.

AVAILABLE FOR IN CAMERA INSPECTION

As noted more specifically herein, Plaintiff(s)/Defendant(s)' object(s) to producing various documents requested herein because they are privileged. Plaintiff(s)/Defendant(s) is/are prepared to produce any documents in their attorney's possession for an in camera court inspection should the Court give notice prior to a hearing that it requests same.

SPECIFIC OBJECTIONS AND RESPONSES TO DOCUMENTS REQUESTED

PHOTOGRAPHS

- RESPONSE:** All such photographs or videos in Plaintiff(s)/Defendant(s)'s or Plaintiff(s)/Defendant(s)' attorney's possession will be made available for inspection and photocopying in Plaintiff(s)/Defendant(s)'s office upon reasonable notice to Plaintiff(s)/Defendant(s)'s

5-57

Responsive documents. Objections are included in these helpful models that blend cooperation and roadblocks.

GENERAL TRIPLE-THREAT FORM 1-50

FORM 1-50: DEFENDANT'S TRIPLE-THREAT TO PERSONAL INJURY PLAINTIFF [R-DIS.501]

DEFENDANT'S FIRST REQUESTS FOR ADMISSIONS, FIRST SET OF INTERROGATORIES AND FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS PROPOUNDED TO PLAINTIFF

TO Plaintiff,

Pursuant to the (Your state) Rules of Civil Procedure, Defendant _____ (hereafter "Defendant") submits to you the following discovery.

INSTRUCTIONS

A. **Requests for Admissions**
"You" must deliver a written response to the attached Requests for Admissions to "opposing attorney" within thirty (30) days after service of same.

B. **Interrogatories**
Answer the attached Interrogatories separately and accurately in writing and under oath. "You" must deliver an original, sworn and executed response to said Interrogatories to "opposing attorney" within thirty (30) days after service of same.

C. **Production Request**
"You" are reminded that "your" written response to this Request for Production shall state, with respect to each category of items, that inspection and other requested action will be permitted as requested, except to the extent that "you" make objections in writing to particular items or categories. "Your" written responses and/or objections, if any, shall be served on the "opposing attorney" within thirty (30) days. "You" are requested to make copies of all documents and mail them to "opposing attorney" as a charge of no more than \$20 per copy. In the alternative, "you" are requested to make all documents or items subject to this Request for Production, available for inspection and copying in "your" offices or "your" attorney's offices within thirty (30) days. If "you" contend that "you" may partially or entirely withhold a requested "document" because of a rule, privilege, immunity, or other reason, for each document partial-ly or entirely withheld, provide the following information: identify the document; identify each person to whom any part of the contents of the documents has been communicated; and state the factual basis on which "you" claim the privilege or immunity.

This request does not seek correspondence between "you" and "your" attorneys after you sent a demand letter to "Defendant."

REQUEST FOR SUPPLEMENTATION

This discovery request is continuing. In the event that any information or material comes to "your" attention, possession, custody or control, or the attention, possession, custody or control of "your" employees, affiliates, subsidiaries, accountants, partners, officers, directors, or attorneys subsequent to production "you" are required to furnish said additional information, answers, or material to the "opposing" attorney as soon as possible.

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Defense documents included. Defendant's triple-threat and supporting discovery forms are provided for employment, insurance, business, and personal injury.

Strike Quickly and Forcefully

Yes, send me one copy of Rogge Dunn's **Triple-Threat Discovery Forms** and its CD with an invoice for \$79 plus tax and shipping. If not satisfied, I may return the book and CD within 30 days. Send the annual supplements on the same 30-day review basis. I may cancel the update service at any time.

TTF1

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“ Charge \$79 to my credit card: “ Visa “ Mastercard “ AMEX

Invoice option (I do not wish to take advantage of the free shipping offer)

“ Bill firm \$85.98 (shipping included)

“ Bill me the same

Card #: _____ Exp. Date: _____

Please complete all blanks, providing a street address for your office.

Printed Name: _____

Firm Name: _____

Office Address: _____ (not residence) Suite: _____

City, State, Zip: _____

Telephone: (____) _____ Fax: (____) _____

Bar #: _____ E-mail: _____

Signature: _____ (Required)

Knock Opposing Counsel Off Balance

Discovery provides the best opportunities for throwing punches that force opposing counsel to react rather than attack.

Rogge Dunn's *Triple Threat Discovery Forms* provides you the power to dominate the early discovery rounds. Combining interrogatories, requests for admissions, and requests for production into one strategically-interwoven document, these powerful discovery documents will hit your opponents hard. You receive triple-threat discovery forms for these types of cases:

- Slip and fall
- Product liability
- Wrongful death
- Insurance coverage
- Bad faith
- Construction services

- Sexual harassment
- Sexual discrimination
- Stealing trade secrets
- Workers' compensation retaliation
- Age discrimination
- Whistleblower



750 pages of powerful discovery forms in print and on CD for only \$79.

Details on front page