Attached please find discovery requests I have received from the opposing party’s attorney. We have 30 days from the date of this letter to answer them.

For the requests to admit you simply need to indicate whether to “admit” or “deny” them. If you are not sure, do not answer and we will discuss a response when we meet. For more information on responding you might read, “[Should one explain one’s request to admit responses?”](https://www.gregoryforman.com/blog/2014/04/should-one-explain-ones-request-to-admit-responses/)

For the interrogatories, I want you to prepare the first draft of the written answers. [Answers need to be accurate, non-evasive, complete, *and minimal*](https://www.gregoryforman.com/blog/2020/10/interrogatory-answers-need-to-be-accurate-complete-and-minimal/)*.*  Please use the third person (“The Plaintiff” or “The Defendant”) rather than the first person (“I”) in answering these questions. The reason these answers need to be third person, and not first person, is that I sign the responses. Please type your answers neatly and succinctly. If there is a question you have concerns or problems with, please call me to discuss. Once you have finished answering these questions, please e‑mail them to me. If you can mail the answers as a Word Perfect or Word attachment, please do so. Otherwise, please provide me your answers in the body of the e‑mail. I will review the responses and get back to you.

For the requests to produce, you will need to provide a listing in the response to requests for production. That response will have a listing for each request of what is being provided and what requested documents might be available from third parties and the name, address, and contact information for that third party. For documents that are responsive to more than one request, list them in the first such request and then note in subsequent relevant requests that they are included in a prior request—list the request number in which they are being provided.

For documents that are responsive but you are not providing, please indicate where they can be located including the name, address and phone number where the documents can be located. Do not indicate that they can be located from the opposing party unless the opposing party is the only person who has these documents. If there are no responsive documents for a particular request, simply write “none.” For documents you want to use at trial that are not in your possession, obtain them and include them in your response.

You will also need to gather up all responsive documents that are in your possession or any document you might want to use at trial even if it is not in your possession. You are not obligated to create documents that do not exists. You are not obligated to obtain documents that will cost you money to obtain (such as medical records or your driving record) unless you already have them.

What a document is available electronically it should be obtained electronically (I dont need hard copies of such documents). For requested items that can be downloaded from online please download them, give them obvious names (“Bank of America savings account statement 10‑2017”), and bring the electronic copies with you to our meeting or send them via a file sharing service such as [dropbox](https://www.dropbox.com/home). Basically any document can be preserved as an electronic file should be produced as an electronic file. Organize the electronic documents in files in folders that correlate to the applicable request (such as “RTP 1,” “RTP 2,” “RTP 3” etc.).

Once you have gathered up the documents, please have copies made of any document that cannot be downloaded online on 8 by 11 ½” paper, unstapled and bring them to me. Ideally you can scan and email me these documents (give them identifying names if you do this). You will save some fees if you can bring me the documents in this manner rather than bringing me originals to copy. Scanning and emailing is even better so long as the files have names that clearly identify the documents.

For more information on responding to requests for production, you might read “[Best practices in responding to requests for production](https://www.gregoryforman.com/blog/2017/02/best-practices-in-responding-to-requests-for-production/).”

There may be some discovery requests you find objectionable due to being overly broad, unduly burdensome or harassing. I still want you to provide me draft responses and we can discuss objecting to the discovery when we meet.

Once you have gathered up the documents and e‑mailed me the interrogatory answers, please call me to set up an appointment to do a final preparation of the discovery responses. I generally like to have that appointment within three weeks of this letter. If we fail to answer the questions within 30 days of service the court can make you pay the other party’s attorney’s fees for filing what is called a “motion to compel.” If we fail to respond to the requests for admissions within 30 days of service they can be deemed admitted.

For further information on how to response to discovery you might read “[The only two goals of responding to discovery](https://www.gregoryforman.com/blog/2018/03/the-only-two-goals-of-responding-to-discovery/).”