

STATE OF NEW YORK

SUPREME COURT COUNTY OF [Insert County]

[Insert Caption]

Plaintiff

Index No: [Insert]

vs.

RJI No: [Insert]

Hon. [Insert]

Defendant

To: Defendant [Insert Name]

PLAINTIFF'S NOTICE TO PRODUCE

PLEASE TAKE NOTICE, that the undersigned demands that you produce, at [Insert Time] on [Insert Date], at the offices of [Name of Law Firm], [Address of Law Firm], for copying, testing or photographing by the plaintiff, or someone acting on the plaintiff's behalf, the following original documents or items that are in the possession, custody or control of said defendant:

INSTRUCTIONS

1. This Further Notice to Produce is intended to be continuing in nature. The answering party shall promptly file supplemental responses if it obtains additional responsive documents or information, or discovers that information produced is incomplete or incorrect.
2. This Further Notice to Produce extends to all information and documents in the possession, custody or control of the answering party, including any parent company, each division and subsidiary thereof, as well as any predecessors or successors, and any of its officers, employees, agents, servants, representatives, attorneys, or other persons directly or indirectly employed or retained by it, or anyone else acting on its behalf or otherwise subject to its control.
3. If any document requested in the Further Notice to Produce was, but no longer is, in the possession, custody, or control of the answering party, state:
 - (a) the substance of the document;
 - (b) the identity and address of the current custodian of the document;
 - (c) the person who made the decision to transfer or dispose of the document; and