

STATE OF NEW YORK

SUPREME COURT COUNTY OF [Insert County]

[Insert Caption]

Plaintiff

vs.

Defendant

PLAINTIFF'S COMBINED
DISCOVERY DEMANDS AND
DEMAND FOR A
VERIFIED BILL OF PARTICULARS
TO [INSERT DEFENDANT]*

TO: Defendant [Insert Name of Defendant]

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:

1. Any films, photographs, video tapes or audio tapes, including transcripts or memoranda thereof, involving a person referred to in paragraph one of subdivision (a) of CPLR Section 3101. There shall be disclosure of all portions of such material, including out-takes, rather than just those portions which a party intends to use. This demand shall not apply to materials compiled for law enforcement purposes, which are exempt from disclosure under section eighty-seven of the Public Officers Law. This is a continuing demand. Should any such material come into your possession, custody or control, or into the possession, custody or control of any party you represent in this action, after the date of this demand, demand is hereby made that you produce such material at the undersigned's office for inspection and copying on the aforesaid date or twenty (20) days after you, or said party, obtain possession, custody or control of same, whichever is later. (*See Tai Tran v. New Rochelle Hosp. Med. Ctr.*, 99 N.Y.2d 383, 756 N.Y.S.2d 509 (2003)). Should any such material come into your possession, custody or control, or into the possession, custody or control of any party you represent in this action, after the date of this demand and less than twenty (20) days before the scheduled deposition of any

* The practitioner should select those requests applicable to her case. It is unlikely that all of them would apply in any particular case.