IN THE CIRCUIT COURT OF COOK COUNTY, ILLINOIS

COUNTY DEPARTMENT, DOMESTIC RELATIONS DIVISION

[FIRST NAME, LAST NAME], )

)

Petitioner, )

) Case No.

[FIRST NAME, LAST NAME], )

)

Respondent. )

**REQUEST FOR PRODUCTION OF DOCUMENTS**

Petitioner/Respondent, [FIRST NAME, LAST NAME], represented by and through himself/herself as a self-represented litigant, requests that Petitioner/Respondent, [FIRST NAME, LAST NAME], respond to the following discovery requests within 28 days, or within a time period set by the court, pursuant to Illinois Supreme Court Rule 214, and the following definitions and instructions:

**Instructions and Definitions**

If your response is that the information or documents are not in your possession or custody, then describe in detail the unsuccessful efforts you made to locate the information or documents. If your response is that the information or documents are not in your control, then identify who has control and the location of the information or documents.

If a request seeks a specific document or an itemized category that is not in your possession, control, or custody, then provide any documents you have that contain all or part of the information contained in the requested document or category. Identify the source of each of the documents you produce, and the name, address, and job title of each person or persons providing or furnishing each document.

If you decline to produce any document requested due to an assertion of the attorney-client privilege, the work product doctrine, or any other privilege, please provide the following information for each document subject to such privileges: (I) the name of author or sender; (2) the name of any person to whom the document was sent or copied; (3) the date of the document; (4) the date on which the document was received by persons having possession of the document; (5) a brief description of the nature and subject matter of the document; (6) the statute, rule, or decision which gives rises to your claim of privilege; (7) the last known custodian of the document and its present location; (8) number of pages in the document; (9) any attachments to the document; and (10) whether the document is handwritten, typed, or otherwise prepared.

The term “document” or “documents” means and refers to all writings and recorded materials of any kind, including originals and non-original copies (whether different from the originals by reason of any notation made on such copies or otherwise), including, without limitation, documents, correspondence, memoranda, notes, e-mail messages, logs, diaries, statistics, letters, invoices, telegrams, minutes, transcripts, contracts, reports, studies, checks, diagrams, drawings, pictures, statements, receipts, returns, journals, ledgers, books of account, summaries, manuals, pamphlets, books, records, card files, interoffice and intra-office communications, research materials, forms, internet communications, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, telefax, invoices, worksheets, all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotapes, recordings motion pictures), any electronic, mechanical, or stored records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings, CDs, computer or server memories, whether on-sight or off-sight), and all other materials handwritten, printed, typed, copied or otherwise reproduced and tangible things on which words, phrases, symbols or information are affixed.

Petitioner/Respondent may make copies of the documents and forward them to Petitioner/Respondent. Alternatively, the time, place, and manner for production may be mutually agreed upon by the parties. These requests shall be deemed to be continuing. Petitioner/Respondent has a duty to reasonably supplement any response with any document or information obtained by or known to you after you serve your answers and responses. The words or terms “you,” “your,” and “Petitioner/Respondent” shall mean and refer to [FIRST NAME, LAST NAME], the Petitioner/Respondent in this lawsuit, and his/her officers, employees, agents, servants, independent contractors, representatives, attorneys, affiliates, divisions, and predecessors-in-interest. The term “Petitioner/Respondent” shall mean and refer to [FIRST NAME, LAST NAME], the Respondent in this lawsuit, and his/her officers, employees, agents, servants, independent contractors, representatives, attorneys, affiliates, divisions, and predecessors-in-interest. Unless otherwise stated, the time period of and for these requests is the date the parties’ were married to the present.

**REQUEST FOR PRODUCTION OF DOCUMENTS, THINGS, AND OBJECTS**

NOTE: Please be mindful of the definition of “Petitioner/Respondent” above:

1. Any and all pay stubs or other documents showing your income from any source for the preceding three years.
2. All employment information, including without limitation, child care reimbursement plan, wages, salaries, bonuses, stock options, commissions, earning, income employment contracts, pay raises, promotions, payroll deductions, other deductions of any kind, credit union accounts, pension plan, pension fund, retirement plan, retirement fund, stock plan and stock fund and other benefits or deductions of any kind which are, were previously, or which, may be in the future paid, available, accepted, rejected, credited, offered, withheld for any purpose by any individual agency, department, company, entity, or otherwise, or to which you are, were or may become entitled in the future, at any time from the date of the marriage through the trial of this matter.
3. Any and all records of all checking and/or savings accounts, including credit union accounts, certificates of deposit, 401(k) accounts and IRA’s maintained by you, individually and/or jointly with any other or others, or any other accounts over which you have had signature authority in any other capacity, including, but not limited to, monthly bank statements, checkbooks, cancelled checks, check registers, deposit slips, check requests, passbooks, statements relating to savings accounts or certificates of savings deposit and any other records from the date of the marriage through the trial of this matter.
4. Any and all monthly statements, receipts and records of all debit card, credit card and/or charge account held, used or maintained by you individually and/or jointly with any other or others, or any other accounts you were or are authorized to charge purchases to the accounts of another person or entity (regardless of whether or not the account or accounts have been closed), from the date of the marriage through the trial of this matter.
5. Any and all stock certificates, bond certificates, mutual funds certificates, and any other evidence of ownership or of any interest in any securities, investments, mutual funds, liquid asset funds, corporation, fund or trust fund naming you individually and/or jointly with any other or others, as the owner of the same from the date of the marriage through the trial of this matter.
6. Any and all bills for rental for any and all safe deposit boxes maintained by you individually and/or jointly with any other or others from the date of the marriage through the trial of this matter. Please produce or list any and all contents of all safe deposit boxes maintained by you, individually or joint with others as of the date of service of this Request for Production of Documents from the date of the marriage through the trial of this matter.
7. Any and all evidence of property and/or interest in property of every kind and character whatsoever owned by you individually and/or jointly with any other or others, including any reversionary interests, and including, but not limited to, accounts receivable, notes, corporate agreements, partnership agreements, tax deferred annuities, profit-sharing statements, pension plan statements and savings account passbooks from the date of the marriage through the trial of this matter.
8. Any and all warranty deeds, quitclaim deeds and deeds to secure debt which name you as grantee or grantor, individually and/or jointly with any other or others, or in your name in trust or in your name as guardian for any other person, relating to any property in which you have or have had any interest or equity from the date of your divorce from Petitioner/Respondent to the date of trial. Also produce all closing statements, sales agreements and options, or other documents relating to your purchase or sale of any interest in real property since the date of the marriage through the trial of this matter, including any leases or mortgages related thereto (including monthly payments and present outstanding balance of principal and interest) together with any evidence showing all contributions in cash or otherwise made by you to the acquisition of such real estate.
9. Any and all documents, memoranda, closing statements or writings relating to any interest you had or may have in real estate, whether as owner, co-owner, fiduciary, trust beneficiary (vested or contingent), partner, limited partner, shareholder, joint venturer, mortgagee, developer, manager or otherwise; and copies of all real estate mortgages held by you, or by any entity (including but not or otherwise; and copies of all real estate mortgages held by you, or by any entity (including but not limited to realty trusts, partnerships or corporations) in which you have or had a present or contingent interest from the date of the marriage through the trial of this matter.
10. Any and all automobile tag registration certificates and automobile title certificates naming you, individually and/or jointly with any other, as owner. Also, please provide the name, address and telephone number of the owner and/or person in possession of any motor vehicles that you currently have access to drive (excluding rental cars) and give the make, model and year of all such vehicles.
11. Any and all copies of any business or personal financial and/or net worth statements, prepared by an accountant or any other person for you or for any business in which you have or had an interest from the date of through the trial of this matter, together with any credit applications, loan applications and other financial information submitted by you to any bank, credit card company or lending institution, or that you have prepared or had for your own use, since the date of the marriage through the trial of this matter.
12. Complete copies of all state and federal income tax returns filed by you individually and/or jointly with any others from the date of the marriage through the trial of this matter, including all accompanying schedules, any attachments to such returns and all worksheets used in preparing same, requests for any tax extensions, and all 1099, K-1 (IRS Form 1065) and W-2 forms received for the same period.
13. All life insurance policies and certificates on your life as well as all premium notices, beneficiary designation forms and other records and documents received or compiled by you in connection with any life insurance of which you are the owner and/or the insured person since the date of the marriage through the trial of this matter. If you have changed the beneficiary of any of your life insurance in the last two (2) years, produce all forms reflecting these changes.
14. Any and all homeowner's, automobile, medical, dental and disability insurance policies insuring you individually or jointly with others, including all schedules attached hereto as well as all premium notices received by you since the date of the marriage through the trial of this matter.
15. All receipts, sales or purchase notices or other documents reflecting your purchase or sale of any interest in any tangible personal property of any nature having a value in excess of $250.00, including but not limited to any gold, silver, stereo and video equipment, furniture, appliances, cameras, computers, boats, televisions, jewels, furs, clothing, automobiles, animals or any other such asset of any nature for the last two (2) years.
16. A list of the names and addresses of any and all proposed expert witnesses and copies of all written reports rendered to you or your attorney by any such proposed expert witness.
17. Copies of all criminal warnings, warrants, indictments and/or accusations issued against you by any legal authority since the date of the marriage through the trial of this matter.
18. All intangible tax returns filed by you, individually and/or jointly with others, with any State of municipal government for the date of the marriage through the trial of this matter.
19. Any promissory notes, stock option agreements, or other instruments evidencing any financial obligation due to you now or in the future.
20. All promissory notes or other documents evidencing any financial obligation or indebtedness.
21. Any profit-sharing plan, pension plan, deferred benefit plan or retirement plan, summary plan description, last annual report of the plan (IRS Form 5500) and any other documents provided by the plan administrator or employer describing or projecting benefits.
22. All documents and/or letters received by you from three (3) years prior to the filing of the divorce to the date of trial from any real estate agent, accountant, bank officer, stock broker, or any other person or entity, notifying you of the value of your interest in any corporation, trust, reversionary interest, or in any real or personal property or any other asset.
23. All contents of all safe deposit boxes maintained by you, individually and/or jointly with others, as of the date of service of this Request for Production of Documents.
24. Any document or other instrument creating a testamentary trust, intervivos trust or other trust in which you are a beneficiary or receives or are to receive some financial distribution now or in the future.

Respectfully Submitted,

/s/ [FIRST NAME, LAST NAME]

Petitioner/Respondent

[First name, Last name]

[Address]

[Address]

[Email Address]

[Phone number]