

Instruction to user: This is a model letter. Modify to suit your facts and circumstances.

<date>

<client>
<address>
<address>
<address>

RE: Dissolution of marriage – Discovery requests

Dear <client>

Enclosed are Interrogatories and Request for Production of Documents, which we received from your spouse's attorney, <spouse's attorney's name>.

Interrogatories are written questions to which you must provide answers that are truthful. I would like you to go through the questions and provide written answers to each of the questions. If you don't understand a question, please call and we will help you with it.

In answering the Interrogatories, I have found that it is extremely helpful if my clients list their answers on separate paper, following the format of the Interrogatories. Well-organized, thoughtful responses will result in a significant financial savings for you for two reasons. When my staff and I draft your formal responses, it will take us less time if your answers are well organized and complete. Unorganized answers that have not received your full attention can often result in office staff having to spend four or five hours of additional work to prepare the responses, resulting in a substantially higher bill for attorney and staff services rendered.

The Request for Production of Documents sets forth documents which you must make available for your spouse's attorney to inspect, if you have the documents in your possession. I would like you to organize the documents and bring or send them to this office with your answers to the Interrogatories. I have also found that it saves staff time if the client organizes the requested documents in bundles that correspond to each of the numbered requests. For example, put all of the documents pertinent to Request No. 1 in one bundle, the documents for Request No. 2 into a separate bundle, etc. This organization would ultimately have to be done by the staff, and it is helpful, and will keep your costs down, if you have already assisted us by doing so.

You are technically obligated to provide the formal answers to the other attorney's office within thirty days from the date they have been received by my office. The documents were received on <date>. Therefore, it would be helpful if you could organize your answers to the Interrogatories and the Production of Documents no later than <date>. If this is not possible, please contact me to let

Answering Request For Production Of Documents

G Psacharopoulos



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