

[CAPTION]

REQUEST FOR PRODUCTION OF DOCUMENTS TO A PARTY

Petitioner, by counsel, submits the following request for production to Respondent, State of Indiana, pursuant to Trial Rule 34. Petitioner hereby demands that the [insert County] Prosecutor produce for inspection and copying by the Petitioner, the following documents within thirty (30) days of service at [insert attorney's address].

This demand for production shall be deemed continuing if the Respondent obtains further information not contained in the response to this request between the time the Respondent(s) responds to this request and the time of trial.

With respect to any document or communication for which you claim a privilege, identify the document or communications as required above, including the general subject matter, but not the substance, state the privilege involved, and state the factual and legal basis for the privilege.

The term "document" shall have the meaning defined in Indiana Rules of Trial Procedure 34A, and shall include, without limitation, any writings, drawings, graphs, charts, photographs, phone records, and any other data compilations from which intelligence can be perceived, with or without the use of detection devices, however produced or reproduced and wherever located. [LIST DOCUMENTS AND RECORDS SOUGHT]

(Signature)