

[CAPTION]

REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW the mother, [insert name], by counsel,[insert name], and hereby submits the following Request for Production of Documents (“Request”) to the [insert county] County Department of Child Services (“DCS”), in care of its attorney. This Request for Production should be considered a request for ongoing discovery for any new or newly discovered requested material throughout the pendency of the case. Pursuant to Trial Rule 34 of the Indiana Rules of Trial Procedure, the mother, by counsel, hereby requests said DCS to submit the following to the offices of [insert name and address], within thirty (30) days of service of this Request:

1. Any and all medical reports, which includes but is not limited to doctors’ reports, hospital reports, radiology reports, psychological reports, and any other medical reports in your possession for the entire period in which the DCS has been involved with this family.
2. Any and all documentation concerning the investigation into any alleged incidents from the police, the caseworker, the prosecuting attorney, and from the DCS, for the entire period in which the DCS has been involved with this family.
3. Any and all petitions and motion which have been filed under this cause number or any other cause numbers concerning this family during the entire period in which the DCS has been involved with this family.
4. Any and all documents concerning the parents’ visitation with the children during the entire period in which the DCS has been involved with this family.
5. Any and all documents and reports that the caseworker has completed since the beginning of the investigation during the entire period in which the DCS has been involved with this family.
6. Any and all documents relevant to investigating this case during the entire period in which the DCS has been involved with this family.

7. A list of any and all witnesses who will be or may be called at trial, including but not limited to lay witnesses, experts, police, prosecuting attorneys, etc.
8. A complete and full list of all documents which will or may be used at trial.
9. Any and all documents any Guardian Ad Litem or Court Appointed Special Advocate may have in his/her possession for the entire period in which the DCS has been involved with this family, including any and all reports prepared for hearings in this or any cause involving this family.
10. Any and all documents relating to any home studies that have been or will be completed for the entire period in which the DCS has been involved with this family.
11. Any and all documents relating to any case plans in this matter for the entire period in which the DCS has been involved with this family.
12. Any and all other discoverable information in your possession for the entire period in which the DCS has been involved with this family.

Respectfully submitted,

[signature]