

IN THE SUPERIOR COURT OF _____ COUNTY
STATE OF GEORGIA

Plaintiff,
vs. _____
Defendant.)
)
)
) CIVIL ACTION
) FILE NO.: _____
)
)

REQUEST FOR PRODUCTION OF DOCUMENTS TO NON-PARTY

RE: Your Employee: _____; Social Security No.: _____
COME NOW, _____, Plaintiff, in the above-identified action, and serves, upon
_____, this Request for Production of Documents, pursuant to O.C.G.A. §9-11-34(c).

YOU ARE HEREBY REQUESTED to comply with said code section by producing and permitting the Defendant's attorney to inspect and copy documents designated below, which are in your possession, custody and/or control. You may do so by faxing and mailing copies of said documents to the undersigned counsel at: Karen Brown Williams, Esq., The Williams Firm, P.C., 1820 The Exchange, Suite 150, Atlanta, Georgia 30339-2018, fax number (770) 955-6173, on or before thirty (30) days from the date of this request. The requested documents are as follows:

- All payroll records from date of employment to present;
- All records related to pension, 401(K) and retirement information;
- All records related to any credit union, employee savings, and pre-tax earning accounts;
- All records related to employee medical and health care benefits.

On the _____ day of _____, 2011.

Respectfully submitted

Karen Brown Williams, Esq.
Georgia Bar No: 760831
Attorney for _____

Prepared by:

Karen Brown Williams, Esq.
THE WILLIAMS FIRM, P.C.
1820 The Exchange, Suite 150
Atlanta, Georgia 30339-2018
770-952-5000, ext. 15
770-955-6173 (facsimile)

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served counsel for the opposing party in the _____ action with a true and correct copy of **REQUEST FOR PRODUCTION OF DOCUMENTS TO NON-PARTY**, by depositing a copy in the United States Mail, with sufficient first-class postage affixed thereon, addressed as follows:

The ____ day of _____, 2011.

Karen Brown Williams, Esq.
Georgia Bar No: 760831
Attorney for _____

Prepared by:

Karen Brown Williams, Esq.
THE WILLIAMS FIRM, P.C.
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