

1 Attorney Name(s) or Party without Attorney  
Firm Name  
2 Firm Address  
3 City, State, Zip Code  
Phone Number(s)  
4 Fax Number  
5 Email Address

6 Attorney for (Name) or Self-Represented

7 **SUPERIOR COURT OF CALIFORNIA**

8 **COUNTY OF SAN FRANCISCO**

9 PLAINTIFF'S NAME,

10 Plaintiff,

11 vs.

12 DEFENDANT'S NAME,

13 Defendant

Case Number:

**ASBESTOS – EXHIBIT G  
STANDARD REQUESTS FOR  
PRODUCTION AND IDENTIFICATION  
OF DOCUMENTS**

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# EXHIBIT G

1                   **DEFENDANTS' STANDARD REQUESTS FOR PRODUCTION AND**  
2                   **IDENTIFICATION OF DOCUMENTS AND THINGS TO PLAINTIFF(S) [SET ONE]**

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3 PROPOUNDING PARTY: Defendants

4 RESPONDING PARTY:

5 SET NO.:                   One

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7           Plaintiff(s) above named is/are hereby requested within 30 days after service of  
8 the complaint or 10 days prior to the date initially noticed for the deposition of  
9 Plaintiff(s), whichever is earlier to identify and produce for inspection and copying the  
10 records and things described herein below.

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12           The below described documents are currently in your possession, custody or  
13 control, are not privileged, and are relevant to the subject matter of this action or  
14 reasonably calculated to lead to the discovery of admissible evidence in this action.

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17                                   **INSTRUCTIONS**

18           1.     You are requested to produce not only those writings and any indices  
19 thereto in your possession, custody or control, but also those writings reasonably  
20 available to you, including those in the possession, custody or control of your attorneys,  
21 agents, or any other person acting on your behalf.

22           2.     You are requested to produce all writings in the same form and order as  
23 they were kept prior to this notice to produce.

24           3.     In the event you are able to produce only some of the writings called for in  
25 a particular request, please produce all writings you are able to produce.

26           4.     Your responses must be verified under oath.

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3 **DEFINITIONS**

4 1. "DOCUMENT" or "WRITING" are defined as in Evidence Code Section  
5 250; and these words refer to all such materials, however produced or reproduced, in  
6 your actual or constructive possession, custody, care or control; and includes, but is not  
7 limited to, originals, copies, non-identical copies, and preliminary, intermediate, and final  
8 drafts of all writings. Evidence Code Section 250 provides: "Writing means handwriting,  
9 typewriting, printing, photostating, photographing, and every other means of recording  
10 upon any tangible thing, any form of communication or representation, including letters,  
11 words, pictures, sounds, or symbols, or combinations thereof." A reference herein to  
12 any one or more of these types of writings shall be construed to include all other types  
13 of writings without limitation.  
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15 2. "YOU" and "YOUR" refers to plaintiff(s), the allegedly injured party, his/her  
16 agents, his/her attorneys, and anyone on his/her behalf.  
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18 3. "EXPOSED PERSON" means to state the complete name and address of  
19 each person whose claimed exposure to asbestos is the basis of this lawsuit.  
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21 4. As used herein, the term "MEDICAL TREATMENT FACILITY" means  
22 hospitals, dispensaries, laboratories, optometry clinics, psychological clinics, clinics of  
23 all other kinds, mental institutions, radiology laboratories, pathology laboratories, rest  
24 homes, sanitariums, convalescent homes, and all other institutions, organizations, and  
25 facilities wherein are practiced the healing arts.  
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27 5. As used herein, the term "MEDICAL PRACTITIONER" refers to all  
28 physicians, osteopaths, dentists, chiropractors, nurses, psychiatrists, psychologists,  
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1 optometrists, physical therapists, and all other persons practicing, or purporting to  
2 practice, the healing arts.

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4 **WRITINGS AND OTHER TANGIBLE ITEMS REQUESTED**

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6 **REQUEST FOR PRODUCTION No. 1:**

7 All DOCUMENTS and WRITINGS (including photographs) concerning,  
8 illustrating, showing or describing any raw asbestos or materials or products containing  
9 asbestos that the plaintiff or exposed party allegedly used or to which the EXPOSED  
10 PERSON was allegedly exposed.  
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13 **REQUEST FOR PRODUCTION No. 2:**

14 All DOCUMENTS in plaintiff's possession or under plaintiff's control that identify  
15 the retail and wholesale suppliers of the alleged asbestos-containing materials that  
16 caused the claimed injuries.  
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19 **REQUEST FOR PRODUCTION No. 3:**

20 All DOCUMENTS and WRITINGS allegedly concerning, proving or indicating  
21 how the EXPOSED PERSON allegedly used the asbestos products and how the  
22 EXPOSED PERSON was allegedly exposed to the asbestos products.  
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25 **REQUEST FOR PRODUCTION No. 4:**

26 All DOCUMENTS AND WRITINGS concerning or constituting communications  
27 (written or verbal) to or from any labor union concerning asbestos.  
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**REQUEST FOR PRODUCTION No. 5:**

All DOCUMENTS and WRITINGS substantiating an income loss, loss of business, or damages due to the EXPOSED PERSON’s physical condition, including W2 forms, wage statements, Social Security records, workers’ compensation files, profit and loss statements, and documentation of retirement and/or pension plans.

**REQUEST FOR PRODUCTION No. 6:**

All containers (e.g., boxes, cans, buckets, sacks, etc.) collected by, under the control or in the possession of the plaintiff evidencing or containing any raw asbestos or materials or products containing asbestos to which the EXPOSED PERSON claims to have been exposed.

**REQUEST FOR PRODUCTION No. 7:**

Samples of all raw asbestos or materials or products containing asbestos to which the EXPOSED PERSON claims to have been exposed.

**REQUEST FOR PRODUCTION No. 8:**

All DOCUMENTS and WRITINGS showing the names of employers, locations and jobs that the EXPOSED PERSON worked on, including any personal diaries, work diaries and photographs.

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2 **REQUEST FOR PRODUCTION No. 9:**

3 All DOCUMENTS and WRITINGS (e.g., articles, papers and/or notes) collected  
4 by, under the control or in the possession of plaintiff that concern health hazards  
5 associated with asbestos materials.  
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7 **REQUEST FOR PRODUCTION NO. 10:**

8 Copies of all medical bills incurred due to the EXPOSED PERSON's alleged  
9 medical condition(s) that are the subject of this lawsuit.  
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12 **REQUEST FOR PRODUCTION No. 11:**

13 All DOCUMENTS and WRITINGS representing, recording or referring to any  
14 disability pension or disability insurance benefits received by the EXPOSED PERSON  
15 or claims/applications by the EXPOSED PERSON for such benefits.  
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18 **REQUEST FOR PRODUCTION No. 12:**

19 All transcripts of testimony and statements under oath by plaintiff or the  
20 EXPOSED PERSON relating to the physical condition of plaintiff or the EXPOSED  
21 PERSON.  
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24 **REQUEST FOR RODUCTION No. 13:**

25 All DOCUMENTS and WRITINGS arising out of any employment of the  
26 EXPOSED PERSON at which the EXPOSED PERSON claims asbestos exposure  
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1 including but not limited to personnel files, physical examinations, medical clearances  
2 and performance reviews.  
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5 **REQUEST FOR PRODUCTION No. 14:**

6 (For the spouse of the EXPOSED PERSON only) Marriage certificate(s) of the  
7 spouse of the EXPOSED PERSON in a loss of consortium action.  
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10 **REQUEST FOR PRODUCTION No. 15:**

11 All DOCUMENTS and WRITINGS collected by, under the control or in the  
12 possession of plaintiff that identify the retail and wholesale suppliers of the alleged  
13 asbestos-containing materials that caused the claimed injuries.  
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16 **REQUEST FOR PRODUCTION No. 16:**

17 If the EXPOSED PERSON is or was a proprietor of a business involving sale,  
18 use or distribution of asbestos-containing products, provide with respect to said  
19 business all purchase orders, purchase receipts, bills of lading, shipping and/or  
20 receiving documents, invoices or bills relating to the purchase, sale or use of any  
21 asbestos-containing products in the business, canceled checks, check registers,  
22 accounts payable ledgers, accounts receivable ledgers, general ledgers, accounting  
23 books and papers relating to the business, architectural specifications, books, product  
24 brochures or other literature, manuals, catalogs, price lists, reference guides, books or  
25 other papers received from suppliers or manufacturers relating to asbestos-containing  
26 products, packages or containers of asbestos-containing products.  
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