

<ASK Responding to their motion to produce>

RESPONSE TO REQUEST TO PRODUCE

<Client's party designation>, <Client's name>, hereby answers with respect to <Opposing party's party designation> request to produce in the above-entitled as follows:

1. <List the documents that we are producing>

<IF Are we objecting to the production of documents?>2. That the <Client's party designation> objects to production of the following documents on the grounds that <Grounds for objecting to production of documents>: <Documents being objected to>.<END IF>

<IF Inspection requested and no objection from us?>3. That the inspection requested will be permitted as requested.<END IF>

<IF Inspection requested and we object?>4. The inspection requested is objected to for the reason that <State reasons for objection to inspection>.<END IF>

<INSERT "Signature and certificate of service.wpt">