

Sample Request for Production of Documents

**EQUAL EMPLOYMENT OPPORTUNITY COMMISSION
BALTIMORE FIELD OFFICE
10 South Howard Street
Baltimore, MD 21201**

_____)	
Jane Doe,)	
)	
COMPLAINANT,)	EEOC NO. XXX-XXXX-XXXXXX
)	
vs.)	
)	
Department of Defense,)	AGENCY CASE NO.: XXXXX
Defense Contact Audit Agency)	
)	
AGENCY.)	
_____)	

COMPLAINANT'S REQUEST FOR PRODUCTION OF DOCUMENTS

The Complainant, through her attorney, Morris E. Fischer, Esq. of Snider and Fischer LLC, requests that the Agency respond to the following request for production of documents. You are required to respond to this request no later than thirty (30) calendar days after receipt of this Request for the Production of Documents. Your response(s) and the documents are to be sent to the undersigned at 104 Church Lane Suite 201, Baltimore, Maryland 21208.

1. Please provide a complete copy of the Complainant's file and any other files maintained by the Agency regarding or referencing the Complainant. Said files are to be in its non-purged form and content. In the event any documents of any kind or nature whatsoever have been removed from said file, name the person in whose care, custody or possession such documents are at, and the reason for their removal.
2. Please provide a complete copy of the Selectee's file and any other files maintained by the Agency regarding or referencing the selectee. Said files are to be in its non-purged form and content. In the event any documents of any kind or nature whatsoever have been removed from said file, name the person in whose care, custody or possession such documents are at, and the reason for their removal.

3. Please provide copies of any documents referred to or relied upon in your answers to interrogatories.
4. All organizational charts which include all employees in the direct supervision of _____ and _____ for the previous five years.
5. All documents you intend to enter into evidence at a dispositive hearing or trial in this case.
6. Provide copies of any and all correspondence between Agency officials, supervisors, managers or other management officials including Team Leaders, persons from the Human Relations or Personnel Department of the Agency pertaining to any matter or issue raised in this case.
7. Provide a copy of any information contained in the promotion package in this case, including rating sheets, interview questions, ranking, etc.
8. Provide all notes written by and records kept by all individuals with input into the subject position regarding this selection process.
9. Provide all emails, memos or any other communications about recommendations for this promotion.
10. Copy of the SF-171 or resume and any other documents submitted by the Selectee in application for the subject position.
11. Copy of the SF-171 or resume and any other documents submitted by Complainant in application for the subject position.
12. Copies of individual ratings of applicants completed by the HR staff and/or the CMP on all applicants for the above position.
13. Copy of the Mobility Agreement signed by the Selectee referenced in the Remarks on the promotion SF-50 dated November 3, 2002 following his selection for the subject position.

Respectfully Submitted,

Date: _____

Morris E. Fischer , Esq.
Attorney for Complainant

