
2. Notice for Discovery and Inspection

May be served together with the Answer to Complaint or within a reasonable amount of time thereafter.

CIVIL COURT: CITY OF NEW YORK
COUNTY OF KINGS

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XYZ Receivables Management LLC,

Index No.

Plaintiff,
- against -

NOTICE FOR DISCOVERY
AND INSPECTION

John Doe,

Defendant.

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SIR/MADAM:

PLEASE TAKE NOTICE, that pursuant to Rule 3120 of the Civil Practice Law and Rules, Defendant demands that Plaintiff produce and permit discovery by him, his attorneys, or another acting on his behalf of the following articles, documents, and things for inspection, copying, testing, and photographing within twenty days after receipt hereof, at [YOUR ADDRESS], at which time said articles, documents and things will be physically inspected, copied tested, photographed, and mechanically reproduced and then returned:

DEFINITIONS

- A. The term "person" means any individual, corporation, partnership or other business entity.
- B. For purposes of this discovery demand, the term "document" includes, but is not limited to original and any copies of contracts, progress schedules, bids or estimates, change orders, extra work orders, correspondence, invoices, bills, receipts, accounting statements, forms, checks, books, records, reports, financial statements, letters, fax, telegrams, speed letters, telexes, notes, memoranda, calculations, diaries, daily work records, drafts, advertisements, sketches, drawings, plans and other tangible things, notices of claim, amended claims, complaint and answers to same, decisions, orders, stipulations, including originals and copies whether typed, handwritten or on tape or other recording, or electronically stored information (ESI), from whatever source, and any material underlying supporting or used in the preparation of any such document or documents.
- C. The term "XYZ" or "Plaintiff" shall refer to Plaintiff XYZ Receivables Management LLC, its servants, agents, or employees.
- D. The term "Defendant" shall refer to Defendant John Doe.

DOCUMENTS

1. All documents evidencing Plaintiff's ability to collect this debt, including, if applicable, (a) Certificate of Incorporation; (b) Articles of Organization; (c) Secretary of State filing receipt; (d) Certificate of Publication; and (e) License as debt collection agency.
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2. Agreement(s) between Plaintiff or any other person and Defendant relating to the subject credit card account.
 3. Account statements for the period of three years prior to and up to and including the alleged date of default or breach of agreement by Defendant.
 4. Checks, receipts, and/or other documents evidencing payment by Defendant on the alleged credit card account for the period of (a) three years prior to and up to and including the alleged date of default or breach of agreement by Defendant; and (b) up to and including the date of commencement of this action.
 5. Assignment(s) or Bill(s) of Sale of debt signed, executed or granted by and between Plaintiff and/or any other person relating to the subject credit card account.
 6. All documents relating to the subject credit card account, including:
 - (a) account application;
 - (b) records of charge relating to the particular charges indicated in the account statements;
 - (c) call log;
 - (d) computer data, including screen print-outs, reflecting account activities; and
 - (e) correspondence to/from Plaintiff, Plaintiff's predecessor-in-interest or any person and Defendant in connection with Defendant's alleged credit card account.

PLEASE TAKE FURTHER NOTICE that, upon failure to comply with this demand, a Motion to compel or strike Plaintiff's pleading will be made pursuant to CPLR 3120 and 3124.

PLEASE TAKE FURTHER NOTICE that the request for items specified in this document is a continuing demand, and should any of the information requested become available or known in the future, you are required to furnish same at such time.

Dated: Brooklyn, New York
_____, 20__

John Doe
Defendant
[YOUR ADDRESS]