
3. Combined Demands

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,

**COMBINED
DEMANDS**

- against -

John Doe,

Defendant.

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SIR/MADAM:

PLEASE TAKE NOTICE, that the undersigned hereby serves the following demands upon you pursuant to CPLR 3120 and 3101 et. seq., returnable at [YOUR ADDRESS], within twenty days after receipt hereof:

1. Demand for the names and addresses of all witnesses.

PLEASE TAKE NOTICE, that the undersigned hereby demands, pursuant to Article 31, that you set forth in writing and under oath the names and addresses of each person claimed by any party you represent to be a witness to any of the following:

- (a) The application for and opening of the subject credit card account.
- (b) The usage and activity of the subject credit card account.
- (c) Alleged default relating to the credit card account.
- (d) Assignment(s) or sale of credit card account.

If no such witnesses are known to the defendant(s), so state in the sworn reply to this demand. The undersigned will object upon trial to the testimony of any witnesses not so identified.

2. Demand for statements.

PLEASE TAKE FURTHER NOTICE, that the undersigned hereby demands that you produce, pursuant to CPLR 3101(e), a) any statements, oral, written, or electronically recorded, from any party represented by the undersigned in your, or your attorney's possession; or b) any statements, signed or unsigned, oral, written or electronically recorded, from any witnesses to the incident or claim to have witnessed the incident.

3. Demand for Photographs and Other Items.

PLEASE TAKE FURTHER NOTICE, that the undersigned demands, pursuant to CPLR Article 31, that you produce any and all photographs, videotapes, movies, surveillance tapes, or transcripts, if any, of the application for, usage of, and/or default in payment of the credit card

account. If no such items are in the possession, custody, or control of any parties you represent in this action, so state in the sworn reply to this demand.

4. Demand for expert witness disclosure.

PLEASE TAKE FURTHER NOTICE, that pursuant to CPLR 3101(d)(1), you are hereby required to set forth the following:

- (a) The name and address of each and every person you expect to call as an expert witness at the trial of this action;
- (b) In reasonable detail, the subject matter on which each expert is expected to testify;
- (c) The substance of the facts and opinions on which each expert is expected to testify;
- (d) The qualifications of each expert witness; and
- (e) A summary of the grounds for each expert's opinion.

5. Demand for trial documents.

PLEASE TAKE FURTHER NOTICE, that the undersigned demands, pursuant to CPLR Article 31, that you produce all documents, photographs, videotapes, records, or other exhibits which you intend to introduce into evidence at trial.

PLEASE TAKE FURTHER NOTICE, that the annexed demands are continuing demands, and that if any of the above items are obtained after the date of this demand, they are to be furnished to the undersigned pursuant to these demands. The undersigned will object to any evidence being introduced at trial which has not been timely produced in response to this Demand.

Dated: Brooklyn, New York
_____, 20__

John Doe
Defendant
[YOUR ADDRESS]