

DIANA ZALESKI

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SUMMIT COUNTY  
CLERK OF COURTS

IN THE COURT OF COMMON PLEAS  
SUMMIT COUNTY, OHIO

Plaintiff,	)	CASE NO.
	)	
vs.	)	JUDGE MILLIGAN
	)	
	)	PLAINTIFF'S MASTER REQUEST FOR
	)	PRODUCTION OF DOCUMENTS
	)	TO DEFENDANT
Defendants.	)	

Plaintiffs, by and through counsel of record, and pursuant to Ohio Civil Rule 34 direct the Defendant to produce the following documents, objects or tangible things for inspection, copying, reproduction and photographing.

**INSTRUCTIONS**

- Instructions and definitions pursuant to the Ohio Rules of Civil Procedure.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1:**

All documents which were relied upon to respond to or which were referred to in Plaintiff's First Set of Interrogatories Propounded to Defendant.

**REQUEST FOR PRODUCTION NO. 2:**

Any picture, diagram, photograph, videotape film, blueprint, and/or drawing of any area where Plaintiff worked at the Defendant's Facility.

**REQUEST FOR PRODUCTION NO. 3:**

All records related to or mentioning Plaintiff, including, but not limited to, personnel records, payroll records, medical or dispensary records, disciplinary records, work records or other tangible things of whatever kind pertaining to Plaintiff.

REQUEST FOR PRODUCTION NO. 4:

All documents including but not limited to, any proposals, quotations, invoices, bills of sales, bills of lading, ledgers, etc., with regard to the acquisition, purchase or sale of any asbestos-containing product intended for use within the Defendant Facility from 1940 to 2000.

REQUEST FOR PRODUCTION NO. 5:

Any document, contract and/or work order that reflects the installation, repair, removal or abatement of asbestos-containing products including asbestos-containing equipment at the Defendant Facility in between 1940 and 2000.

REQUEST FOR PRODUCTION NO. 6:

A copy of the complete file of any expert that Defendant may call upon at the trial of this case and the *curriculum vitae* of each such expert.

REQUEST FOR PRODUCTION NO. 7:

Any medical record, report, radiograph, x-ray, CT study, HRCT study or any other thing in the custody, possession or control of the Defendant or of any expert retained by Defendant relating to the Plaintiff in this case.

REQUEST FOR PRODUCTION NO. 8:

All documents or other tangible things upon which the Defendant will rely for impeachment or rebuttal purposes in the trial of this matter.

REQUEST FOR PRODUCTION NO. 9:

All exhibits and documents that you intend to submit at the trial of this matter.

REQUEST FOR PRODUCTION NO. 10:

Any document, recording or other tangible thing that contains a statement by the Plaintiff or a statement by any witness in this matter.

REQUEST FOR PRODUCTION NO. 11:

Any photograph, videotape recording or other tangible thing that is a photographic representation of the Plaintiff.

REQUEST FOR PRODUCTION NO. 12:

Any written, transcribed or recorded statements made by \_\_\_\_\_ and any photographs, films, videotapes or any other video or audio representations or recordings of \_\_\_\_\_ or any witness identified by Plaintiff.

REQUEST FOR PRODUCTION NO. 13:

All documents identifying results of tests for levels of airborne asbestos fibers conducted by any governmental agency at the Facility during the relevant time period.

REQUEST FOR PRODUCTION NO. 14:

All documents relating to field tests caused to be conducted by Defendant to determine the nature and extent of asbestos dust/fiber exposure to employees of Defendant removing and/or tearing out asbestos-containing products at Defendant's facilities, with respect to such employees as were so employed.

REQUEST FOR PRODUCTION NO. 15:

All documents relating to field tests caused to be conducted by Defendant to determine the nature and extent of asbestos dust/fiber exposure to employees working with, installing, or applying asbestos-containing products at Defendant's facilities, with respect to such employees as were so employed.

REQUEST FOR PRODUCTION NO. 16:

All documents relating to medical tests of employees to determine presence of pneumoconiosis.

REQUEST FOR PRODUCTION NO. 17:

Every affidavit, statement and/or transcript of testimony of each witness this Defendant intends to call at trial and/or of any person having knowledge of relevant facts to this litigation.

REQUEST FOR PRODUCTION NO. 18:

All documents of findings by the Occupational Safety and Health Administration (“OSHA”) concerning the presence of harmful asbestos at the facility during the relevant time period.

REQUEST FOR PRODUCTION NO. 19:

All documents of findings by the Environmental Protection Agency (“EPA”) concerning the presence of harmful asbestos at the facility during the relevant time period.

REQUEST FOR PRODUCTION NO. 20:

All documents of findings by the State of Ohio, the Ohio Bureau of Workers’ Compensation and/or the Industrial Commission of Ohio concerning the presence of harmful asbestos at the facility during the relevant time period.