

IN THE PROBATE COURT FOR \_\_\_\_\_ COUNTY  
STATE OF GEORGIA

IN RE: ESTATE OF

\_\_\_\_\_,  
Deceased.

\_\_\_\_\_,  
Petitioner.

\_\_\_\_\_,  
Caveator.

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Estate No: \_\_\_\_\_

**CAVEATOR'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO  
PETITIONER**

TO: \_\_\_\_\_

You are hereby requested pursuant to O.C.G.A. 9-11-34 to produce on the 30<sup>th</sup> day from the receipt of this pleading, or at any sooner agreeable time to Caveator's counsel, \_\_\_\_\_, the numbered items described herein and there to permit the inspection, copying and photographing of said items.

In lieu of appearance, you may photocopy said items and deliver them to the undersigned.

**DEFINITIONS AND INSTRUCTIONS**

- a. A "communication" or "communications" means all oral conversations, discussions, letters, telegrams, memoranda, meeting minutes, emails, facsimile transmissions, and any other transmission of information in any form, both oral and written.
- b. A "document" means any legal documents, business records, letters, memoranda, notes, statements, reports, work papers, drafts, copies, inter-office and intra-office communications and messages, drawings, and graphic material,

whether created or stored in written, printed, tangible, electronic, mechanical, or electrical form of any kind, including material on computer hard drives, tapes, disks, files, and other memories, backup copies and "deleted" files, whether located on-site or off-site,

- c. "You" includes your agents, employees, insurance company, your agents and employees, and your attorneys, investigators and anyone else acting on your behalf.
- d. "Custodian" refers to the person having possession, custody or control of any writing or physical evidence.

### DOCUMENTS REQUESTED

1. A copy of each and every invoice, estimate, receipt, or other document that records or memorializes any expense forming the basis of or being a part of your claim for a year's support.
2. A copy of all bank statements you have received from [DECEDENT'S DATE OF DEATH] to the present for accounts in your individual name.
3. A copy of all bank statements you have received from [DECEDENT'S DATE OF DEATH] to the present for accounts in the name of [DECEDENT] or you in your capacity as the Administrator of the Estate of \_\_\_\_\_.
4. A copy of all statements or other documents you have received from [DECEDENT'S DATE OF DEATH] to the present concerning retirement or investment accounts belonging to [DECEDENT] during his life.
5. A copy of all documents reflecting the existence and/or payment of life insurance proceeds upon the life of [DECEDENT].
6. A copy of any and all documents reflecting income you have received from [DECEDENT'S DATE OF DEATH] to the present.
7. A copy of each and every trust for which you are a beneficiary.
8. A copy of all invoices for legal services rendered to you or to the estate of [DECEDENT] since [DECEDENT'S DATE OF DEATH].
9. A copy of your tax returns for the tax years \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_, \_\_\_\_\_.
10. A copy of all creditor claims or other documents reflecting a debt claimed to be owed by the estate of [DECEDENT].
11. A copy of all documents you may submit as evidence at the hearing of your claim for year's support.

12. A copy of all demonstrative exhibits you may submit or utilize at the hearing of your claim for year's support.

13. A copy of the title for each vehicle you own.

14. A copy of all documents you contend support a monetary value for the real property and vehicles you seek as a part of your claim for year's support.

This \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

/s/\_\_\_\_\_