**IN THE UNITED STATES DISTRICT COURT**

**FOR THE DISTRICT OF COLORADO**

Civil Action No. \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

XOXOXO,

Plaintiff(s),

v.

XOXOXO,

Defendant(s).

**PLAINTIFF’S REQUESTS FOR PRODUCTION**

Under Rule 34 of the Federal Rules of Civil Procedure, Plaintiff directs the following requests for production to Defendant to be responded to fully within thirty days. These requests for production are continuing and require supplemental responses as provided by Rule 26(e) of the Federal Rules of Civil Procedure.

The words “I” “me” and “my” refer to the Plaintiff.

The words and “you” and “yours” refer to the Defendant.

The words “Adverse Action” mean [describe the thing you say in your Complaint that the Defendant did improperly, like harassing, firing, demoting, or not hiring you]

The word “Discrimination” means [insert the illegal conduct you say in your Complaint you experienced, like (1) gender discrimination; (2) race discrimination; (3) age discrimination; (4) disability discrimination; (5) religious discrimination; (6) national origin discrimination; (7) sexual orientation discrimination; (8) sexual harassment; (9) hostile work environment; and/or (10) retaliation]

**Please produce:**

1. All documents you relied on in taking Adverse Action against me.
2. All documents relating to the Adverse Action against me.
3. All documents relating to any investigation conducted into any event I describe in the Complaint.
4. All documents related to any complaint made by me or about me.
5. All documents you provided to me or I provided to you any time before I filed my Complaint.
6. My entire personnel or employee file.
7. All supervisors’ records and human resources’ records (including communications, notes, and files) about me.
8. All documents referencing and/or relating to me and my job performance.
9. All documents supervisors looked at or considered in making performance reviews or appraisals of me.
10. All documents relating to any investigation you conducted in response to concerns I raised.
11. All documents relating to any complaint of Discrimination, whether formal or informal, verbal or written, internal or external.
12. All documents showing your policies, procedures, and training about discrimination in the work place.
13. All documents about assessments of your work culture and environment (including but not limited to issues of diversity, equity, and inclusion and compliance with federal and state anti-discrimination and retaliation laws and regulations).
14. All documents, excluding medical and financial information, comprising the entire personnel files of[insert name of person responsible for Discrimination].
15. All documents relating to any complaint (formal or informal, verbal or written, internal or external) made by anyone about [insert name of person responsible for Discrimination].
16. Produce all documents reflecting discipline, coaching, counseling, or performance management, whether verbal or written, given to [insert name of person responsible for Discrimination].
17. All documents showing compensation or benefits that were available to me during my employment or would have been available to me if my employment had continued to the present.
18. All documents you consulted, relied upon, or referenced in responding to any Interrogatory I submitted.

**As appropriate:**

1. All documents you provided to or received from any state or federal agency or department about my charge of Discrimination.
2. All documents relating to my filing of a charge of Discrimination with any state or federal agency or department.
3. All job postings (external or internal) for the position(s) you denied me.
4. All documents referencing and/or relating to the credentials of individuals who were you selected for the position(s) you denied me.
5. Produce all documents that reflect any disciplinary action for [list the reason the Defendant gave for doing what it did].
6. All documents including correspondence that contain any jokes or comments related to [gender, sexuality, race, age, disability, religion, national origin].

\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

NAME

ADDRESS

PHONE

E-MAIL

*Pro Se*

**CERTIFICATE OF SERVICE**

I certify that on Day, Month, Year, I served this by putting it in United States mail, first class postage prepaid, addressed to:

|  |  |
| --- | --- |
| NAME  ADDRESS  CITY, STATE, ZIP  E-MAIL  \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_  NAME  ADDRESS  PHONE  E-MAIL  *Pro Se* |  |