**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 these 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.

1. All documents relating to the number of hours I worked for you, including but not limited to, time sheets, payroll stubs, computer logs, and logs from time-tracking software for the relevant period.
2. All manuals, handbooks, policies, procedures, notices, or directives you issued, regarding employee compensation and benefits, including salary or hourly rates, overtime pay, bonus pay, commissions, merit raises, charge-backs, payroll deductions, paid time off, fringe benefits, incentives, health care coverage, disability, pension, expense reimbursement, or other similar forms of compensation or benefits.
3. All documents regarding your policies regarding the compensation of individuals with the same job duties as I have, or who do the same work as I did, during the relevant period.
4. All documents regarding conversations or other communications by either of us regarding my compensation.
5. All documents regarding the job descriptions, job duties, training and educational requirements, job classifications under the Fair Labor Standards Act, and corresponding pay scales for your employees who performed work like I did during the relevant period.
6. All documents regarding the percentage of time I spent on each task or duty in the my job description, and on each task or duty not listed in the my job description, during the relevant period.
7. All documents showing the rate the you charged customers for my work.

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

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* |  |