

CAUSE NO. \_\_\_\_\_

THE STATE OF TEXAS                    §                    IN THE DISTRICT COURT OF  
V.                                                §                    \_\_\_\_\_ COUNTY, TEXAS  
[INSERT PROPERTY]                    §                    \_\_\_\_\_ JUDICIAL DISTRICT

**DEFENDANT’S RESPONSE TO PLAINTIFF’S REQUEST FOR PRODUCTION**

Pursuant to Rule 196 of the Texas Rules of Civil Procedure, Defendant responds as follows to the requests of Plaintiff.

**REQUEST NO. 1:** [COPY REQUEST NO. 1 FROM THE PLAINTIFF'S REQUEST, WORD-FOR-WORD.]

**RESPONSE NO. 1:** [Your answer to each request for production will be one of three responses:

(1) that production will be **permitted**;

Example only: Production, inspection, and other requested action will be permitted as requested with respect to [fill in what the item is; for example, (“Bank records of ABC Company for the period of June 1, 2015 through January 1, 2016];

(2) that you **cannot produce** the requested document;

Example only: No items have been identified that are responsive to the request. Defendant has made a diligent search in an effort to comply with the Request

(3) that you **object** to the production of the document.

Example only: Defendant objects to Plaintiff's request for production of documents because the request is beyond the scope of this lawsuit, and therefore

irrelevant, immaterial, and not reasonably calculated to lead to the discovery of  
admissible evidence.]

**REQUEST NO. 2:** [COPY REQUEST NO. 2 FROM THE PLAINTIFF'S REQUEST, WORD-  
FOR-WORD.]

**RESPONSE NO. 2:** [STATE WHETHER THE PRODUCTION WILL BE **PERMITTED**,  
WHETHER YOU **CANNOT PRODUCE** THE REQUESTED DOCUMENT, OR WHETHER  
YOU **OBJECT** TO THE PRODUCTION OF THE REQUESTED DOCUMENT, AS  
PROVIDED IN THE EXAMPLE ABOVE IN RESPONSE NO. 1.]

**REQUEST NO. 3:** [COPY REQUEST NO. 3 FROM THE PLAINTIFF'S REQUEST, WORD-  
FOR-WORD.]

**RESPONSE NO. 3:** [STATE WHETHER THE PRODUCTION WILL BE **PERMITTED**,  
WHETHER YOU **CANNOT PRODUCE** THE REQUESTED DOCUMENT, OR WHETHER  
YOU **OBJECT** TO THE PRODUCTION OF THE REQUESTED DOCUMENT, AS  
PROVIDED IN THE EXAMPLE ABOVE IN RESPONSE NO. 1.]

[CONTINUE AS NECESSARY.]

Respectfully submitted,

[SIGN YOUR NAME]  
[PRINT YOUR NAME]  
[ADDRESS]  
[PHONE NUMBER]  
[EMAIL]

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document was sent on the [DAY] day of [MONTH] [YEAR] by regular U.S. mail, by facsimile, or certified mail, return receipt requested, to the following parties or attorneys of record:

[NAME OF THE STATE'S ATTORNEY], Attorney at Law  
[ADDRESS OF THE STATE'S ATTORNEY]

[NAME EACH INTERESTED PARTY OR THEIR ATTORNEY,  
IF REPRESENTED]  
[ADDRESS OF INTERESTED PARTY OR THEIR ATTORNEY,  
IF REPRESENTED]