

Discovery Request Template

Standardized framework for serving interrogatories, requests for production, and requests for admission in civil litigation matters.

Important Notice: This template provides a general framework and does not constitute legal advice. Users should verify compliance with applicable federal, state, and local rules for their specific jurisdiction and case type.

1. Case Information

Court Name*

e.g., United States District Court, Southern District of New York

Case Caption*

Plaintiff(s) v. Defendant(s)

Case/Docket Number*

e.g., 1:24-cv-01234

Judge Assigned

Hon. [Judge Name]

Case Type*

-- Select Case Type --



2. Propounding Party Information

Propounding Party Name*

Party Designation*

Attorney Name*

Bar Number*

Law Firm Name

Firm Address*

Phone Number*

Email Address*

3. Responding Party Information

Responding Party Name*

Full legal name of party receiving discovery

Party Designation*

-- Select Designation --



Responding Party's Counsel (if known)

Attorney name and firm

Service Address*

Address for service

4. Discovery Type Selection

Discovery Types Included*

- Interrogatories
- Requests for Production of Documents
- Requests for Admission

Set Number*

e.g., First, Second

Applicable Rules*

-- Select Rules --



Note: FRCP Rule 33 limits interrogatories to 25 (including subparts) unless stipulated or court-ordered. State limits vary—verify your jurisdiction's requirements before finalizing.

5. Instructions to Responding Party

Use Standard Instructions

- Include duty to supplement responses
- Include continuing obligation language
- Require responses under oath
- Require identification of persons answering

Custom Instructions

Add any case-specific instructions here...

Response Deadline (Days)*

-- Select Deadline --



Custom Deadline Date

dd/mm/yyyy



Important: Under FRCP Rule 33, responses are due within 30 days of service. Under Rule 36, failure to respond to Requests for Admission within 30 days results in automatic admission.

6. Definitions

Include Standard Definitions

- "Document"
- "Communication"
- "Person"
- "You/Your"
- "Identify"
- "Relating to/Concerning"
- "Electronically Stored Information (ESI)"

Relevant Date Range - Start*

dd/mm/yyyy



Relevant Date Range - End*

dd/mm/yyyy



Custom Definitions

Define any case-specific terms here...

7. Interrogatories

Interrogatory Count Limit

e.g., 25 (FRCP default)

Interrogatories*

Enter each interrogatory numbered sequentially (e.g., INTERROGATORY NO. 1: State your full legal name...)

Guidance: Number each interrogatory sequentially. Count all subparts toward your limit. Interrogatories should seek facts, witness identities, document locations, and contentions. Avoid compound questions that courts may strike.

8. Requests for Production of Documents

Production Format Requested

-- Select Format --



Requests for Production*

Enter each request numbered sequentially (e.g., REQUEST FOR PRODUCTION NO. 1: All contracts between...)

ESI Protocol Notes

Specify custodians, date ranges, file types, or platform-specific requests (Slack, Teams, cloud storage, etc.)

Note: Under FRCP Rule 34, requests must describe items with reasonable particularity. Specify format for ESI production. Consider proportionality under Rule 26(b)(1).

9. Requests for Admission

Requests for Admission*

Enter each request numbered sequentially (e.g., REQUEST FOR ADMISSION NO. 1: Admit that you signed the contract dated...)

Warning: Under FRCP Rule 36, matters are automatically deemed admitted if not responded to within 30 days. Requests should address specific facts, document authenticity, or application of law to fact.

10. Proportionality Statement

Proportionality Factors Considered

- Importance of issues at stake
- Amount in controversy
- Parties' relative access to information
- Parties' resources
- Importance of discovery to resolving issues
- Burden vs. likely benefit

Proportionality Justification

Explain why these discovery requests are proportional to the needs of the case...

11. Certificate of Service

Date of Service*

dd/mm/yyyy



Method of Service*

- Electronic filing (ECF/CM)
- Email
- First-class mail
- Hand delivery
- Overnight courier

Persons/Parties Served*

List all parties served with name and address

12. Additional Notes

Jurisdictional Notes

Note any state-specific requirements, local rules, or standing orders that apply...

Additional Comments

Any other relevant information...

13. Attorney Signature

Rule 26(g) Certification: By signing, attorney certifies that discovery requests are (1) consistent with the rules, (2) not interposed for improper purpose, and (3) not unreasonably burdensome or expensive given case needs.

Attorney Signature*

Date*

Signature

Date Signed

Printed Name*

Bar Number*

Firm Name

Address*

Phone Number*

Email Address*