

Court File No. _____

**IN THE SUPREME COURT OF NEWFOUNDLAND AND LABRADOR
GENERAL DIVISION**

BETWEEN: _____ **PLAINTIFF**

_____ **PLAINTIFF**

_____ **PLAINTIFF**

AND: _____ **DEFENDANT**

_____ **DEFENDANT**

_____ **DEFENDANT**

List of Documents

The following is a list of documents relating to any matter in question in this proceeding that are or have been in the possession, custody or control of the _____ and it is served in compliance with rule 32.01) (the order herein dated the _____ day of _____, ____):

1. the _____ has in _____ possession, custody or control the documents in this proceeding enumerated in Part I of the Schedule attached hereto:

2. the _____ objects to produce the documents enumerated in Part 2 of the Schedule on the ground that they are privileged from production for the reasons stated in the Schedule;

3. the _____ has had, but has not now, in _____ possession, custody or control the documents enumerated in Part 3 of the Schedule which were last in his or her possession, custody or control as stated in the Schedule; and
4. neither the _____ nor _____ solicitor nor any other person on his or _____ behalf, has now or ever had, in _____ possession, custody or control any document or any description whatever relating to any matter in question in this proceeding other than the documents enumerated in the Schedule.

AND TAKE NOTICE that a true copy of each of the documents listed in Part I of the Schedule, for which privilege from production is not claimed, is attached hereto and any of these documents may be inspected by immediately communicating with the undersigned;

AND FURTHER TAKE NOTICE that unless you deny it by serving a notice thereof on me within ten days after being served with this list of documents, or it is denied in your pleading, or the Court otherwise orders, you shall be deemed to admit that any document listed in Part I of the Schedule, a true copy of which has been served on you, and described

(a) as an original document, is such a document and was printed, written, signed or executed as it purports respectively to have been; and

(b) as a copy, is a true copy.

Part 3

DATED at _____, Newfoundland and Labrador, this _____ day of _____, _____.

Whose address for service is:

TO: _____

Whose address for service is:
