

1 *{YOUR INFO HERE}*

2
3 *{YOUR NAME HERE}*, In Pro Per

4
5 **Superior Court of California**
6 **for the County of *{YOUR COURT}***

7)	Case No.: <i>{YOUR CASE NUMBER}</i>
8	<i>{JDB HERE}</i> ,)	
9	Plaintiff,)	SEPARATE STATEMENT OF ITEMS IN
10	vs.)	DISPUTE IN SUPPORT OF
11	<i>{YOUR NAME HERE}</i> ,)	DEFENDANT’S MOTION TO COMPEL
12	Defendant)	FURTHER RESPONSES TO REQUESTS
)	FOR PRODUCTION OF DOCUMENTS,
)	SET ONE, FROM MIDLAND FUNDING

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14 TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF RECORD: Defendant,
15 *{YOUR NAME HERE}*, hereby submits his Separate Statement of Items in Dispute in support of
16 his motion to compel further responses to Defendants Request for Production, Set One, from
17 Plaintiff Midland Funding. Such statement is submitted in conformance with California Rule of
18 Court 3.1345(a).

19 Defendant’s Request for Production of Documents No. 2:

20 ALL DOCUMENTS relating to or constituting ANY assignment to Plaintiff of the account
21 referred to in the complaint.

22 Plaintiff’s Response to Request No 2:

23 “Responding Party objects to this demand on the grounds that it requests documents that are
24 protected by the attorney-client and work product privileges, and the request also seeks documents
25 that are privileged, trade secret and proprietary in nature. Without waiving the foregoing
26 objections and subject thereto, plaintiff responds as follows: Attached hereto as EXHIBIT 1 are
27 non-privileged documents responsive to this demand”

28 Reason Why Further Response Should be Provided:

Exhibit 1 is a copy of terms and agreements for a chase card account. These documents in no way
show any assignment of the account in question to the Plaintiff. Nowhere is there any reference to
any account number or any assignment to the Plaintiff. The documents requested, if they exist,
constitute agreements between plaintiff and the original creditor. There is no good faith basis for

1 plaintiff to contend that responsive documents are protected by the attorney-client privilege, the
2 work product doctrine, or constitute trade secrets.

3 If plaintiff does not have a valid assignment of the account at issue in the complaint, it does not
4 have standing to pursue its claims. Please produce all documents responsive to this request.

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7 *{DATE}*

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11 *{YOUR NAME HERE}*

12 In Pro Per

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