**SCHEDULE 1**

**LIST OF DOCUMENTS OF (PARTY)**

Schedule A

Documents in my possession, control or power that I do not object to producing for inspection.

[*Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it.*]

Schedule B

Documents that are or were in my possession, control or power that I object to producing on the grounds of privilege.

[*Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State the grounds for claiming privilege for each document.*]

Schedule C

Documents that were formerly in my possession, control or power but are no longer in my possession, control or power.

[*Number each document consecutively. Set out the nature and date of the document and other particulars sufficient to identify it. State when and how possession or control of or power over each document was lost, and give the present location of each document.*]

Take Notice that the documents listed in Schedule A may be inspected during normal business hours at \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ [place].

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Party

(include attached Lawyer’s Certificate or Self-Represented Party’s Certificate)

**LAWYER’S CERTIFICATE**

I certify that I have explained to my client:

1. the necessity of making full disclosure of all documents relating to any matter in issue in the action; and
2. what kinds of documents are likely to be relevant to the allegations made in the pleadings.

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Lawyer

**SELF-REPRESENTED PARTY’S CERTIFICATE**

I certify that I understand:

1. the necessity of making full disclosure of all documents relating to any matter in issue in the action; and
2. what kinds of documents are likely to be relevant to the allegations made in the pleadings.

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_ \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

 Party