

FORM 16B

Rule 16.02(1)

LIST OF DOCUMENTS

IN THE LOCAL COURT
AT _____

Claim No. _____

Plaintiff

and

Defendant

TO THE _____

I, the above-named _____ say as follows:

1. I have in my possession, custody or power, the documents enumerated in Part 1 of Schedule 1 relating to the questions in this proceeding.
2. The documents enumerated in Part 2 of Schedule 1 are privileged, and I object to producing them.

The documents are privileged on the following grounds:

(e.g.)

(a) as to documents numbered 4 — 6, that _____;

(b) as to documents numbered 7 — 9, that _____.

3. I have had, but no longer have, in my possession, custody or power, the documents enumerated in Schedule 2 relating to the questions in the proceeding.
(e.g.)
(a) Document numbered _____ was last in my possession, custody or power on _____ and I believe that _____.
4. To the best of my knowledge, information and belief neither I nor my legal practitioner nor any other person on my behalf has now, or ever had, in my or his or her possession, custody or power, any documents relating to a question in the proceeding other than the documents enumerated in Schedules 1 and 2.

Dated: _____

Describe each document in the Schedules as original or copy and number each of them

SCHEDULE 1

PART 1
DOCUMENTS IN PARTY'S POSSESSION

PART 2
PRIVILEGED DOCUMENTS

SCHEDULE 2
DOCUMENTS NO LONGER IN PARTY'S POSSESSION
