**Arbitration and Mediation-Arbitration Proceedings:**

**Request to Produce Documents**

Requesting party: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Responding party: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

*“Documents” means electronic files, photocopies and original copies of draft and final documents including but not limited to: electronic and print correspondence, memoranda, spreadsheets and social media posts and comments; reports, assessments, appraisals and valuations; corporate documents, including financial statements, ledgers, shareholders’ agreements and records of payments to non-arm’s-length parties; financial documents, including personal and corporate tax returns and tax records, banking records, account statements, receipts and invoices; contracts, agreements and memoranda of understanding; photographs, audio recordings and video recordings; and, other documents, regardless of form, along with any annexes and appendices. Electronic metadata and copies of documents that have been altered – for example by the addition of marginal or handwritten notes, the use of track-changes, or the insertion of embedded comments – are separate documents from the original documents and may also be subject to a production order in response to a request for documents.*

| **No.** | **Documents or category of documents requested** | **Explanation of relevance and materiality of documents requested** | **Responding party’s explanation of objections to production of requested documents** | **Response to objections to production of requested documents** | **Arbitrator’s decision on request** |
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