

**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
1					
2					
3					
4					
5					
6					