

Attachment to Non-Party Subpoena

Rule 34 of the Indiana Rules of Trial Procedure provides that a request for production of documents may be served on a non-party. The request shall set forth the items to be inspected either by individual item or by category, and describe each item and category with reasonable particularity. The request shall specify a reasonable time, place, and manner of making the inspection and performing the related acts. The party upon whom the request is served shall serve a written response within a period designated in the request, not less than thirty [30] days after the service thereof or within such shorter or longer time as the court may allow. The response shall state, with respect to each item or category, that inspection and related activities will be permitted as requested, unless it is objected to, in which event the reasons for objection shall be stated. If objection is made to part of an item or category, the part shall be specified. The party submitting the request may move for an order under Rule 37(A) with respect to any objection to or other failure to respond to the request or any part thereof, or any failure to permit inspection as requested.

The witness or person to whom a request for production of documents is directed is entitled to security against damages or payment of damages resulting from such request and may respond to such request by submitting to its terms, by proposing, different terms, by objecting specifically or generally to the request by serving a written response to the party making the request within thirty (30) days or by moving to quash as permitted by Rule 45(B). A party who produces documents for inspection shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the request.