

NO.

IN THE MATTER OF  
THE MARRIAGE OF

§ COUNTY COURT AT LAW  
§  
§ NO. 4  
§  
§  
§ WILLIAMSON COUNTY, TEXAS

AND

**REQUESTS FOR DISCLOSURE**

TO: \_\_\_\_\_, (hereinafter referred to as the “Responding  
Party”) by and through his attorney of record.

FROM: \_\_\_\_\_, by and through her attorney of record,  
Terence Davis, (hereinafter referred to as the “Requesting Party”).

**I.  
RULE 194.2 REQUESTS**

**Rule 194.2(a):**

State the correct names of the parties to the lawsuit.

**Response:**

**Rule 194.2(b):**

State the names, addresses, and telephone numbers of any potential parties.

**Response:**

**Rule 194.2(c):**

State the legal theories and, in general, the factual bases of your claims or defenses in this case.

**Response:**

**Rule 194.2(d):**

State the amount and any method of calculating economic damages.

**Response:**

**Rule 194.2(e):**

State the names, addresses, and telephone numbers of persons having knowledge of relevant facts, and give a brief statement of each identified person's connection with the case.

**Response:**

**Rule 194.2(f):**

For any testifying expert

- (1) the expert's name, address, and telephone number;
- (2) the subject matter on which the expert will testify;
- (3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the responding party, documents reflecting such information;
- (4) if the expert is retained by, employed by, or otherwise subject to control of you:
  - a. all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and
  - b. the expert's current resume and bibliography.

**Response:**

**Rule 194.2(g):**

Produce the originals or copies of any indemnity and insuring agreements described in rule 192.3(f) of the Texas Rules of Civil Procedure.

**Response:**

**Rule 194.2(h):**

Produce the originals or copies of any settlement agreements described in rule 192.3(g).

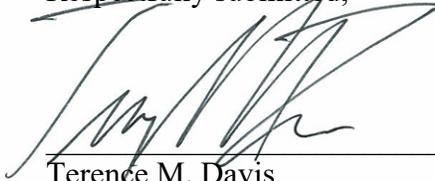
**Response:**

**Rule 194.2(i):**

Produce the originals or copies of any witness statements described in rule 192.3(h) of the Texas Rules of Civil Procedure.

**Response:**

Respectfully submitted,

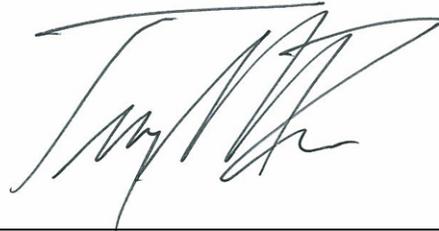


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**Certificate of Service**

I certify that a true copy of the above was served on each attorney of record or party in accordance with the Texas Rules of Civil Procedure on the 6<sup>TH</sup> day of August 2020.



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Terence Davis