

1       **Rule 34. Production of documents and things and entry upon land for**  
2 **inspection and other purposes.**

3       (a) Scope.

4       (a)(1) Any party may serve on any other party a request to produce and permit the  
5 requesting party to inspect, copy, test or sample any designated discoverable  
6 documents, electronically stored information or tangible things (including writings,  
7 drawings, graphs, charts, photographs, sound recordings, images, and other data or  
8 data compilations stored in any medium from which information can be obtained,  
9 translated, if necessary, by the respondent into reasonably usable form) in the  
10 possession or control of the responding party.

11       (a)(2) Any party may serve on any other party a request to permit entry upon  
12 designated property in the possession or control of the responding party for the purpose  
13 of inspecting, measuring, surveying, photographing, testing, or sampling the property or  
14 any designated discoverable object or operation on the property.

15       (b) Procedure and limitations.

16       (b)(1) The request shall identify the items to be inspected by individual item or by  
17 category, and describe each item and category with reasonable particularity. The  
18 request shall specify a reasonable date, time, place, and manner of making the  
19 inspection and performing the related acts. The request may specify the form or forms  
20 in which electronically stored information is to be produced.

21       (b)(2) The responding party shall serve a written response within 28 days after  
22 service of the request. The responding party shall restate each request before  
23 responding to it. The response shall state, with respect to each item or category, that  
24 inspection and related acts will be permitted as requested, or that the request is  
25 objected to. If the party objects to a request, the party must state the reasons for the  
26 objection. Any reason not stated is waived unless excused by the court for good cause.  
27 The party shall identify and permit inspection of any part of a request that is not  
28 objectionable. If the party objects to the requested form or forms for producing  
29 electronically stored information -- or if no form was specified in the request -- the  
30 responding party must state the form or forms it intends to use.

31       (c) Form of documents and electronically stored information.

32 (c)(1) A party who produces documents for inspection shall produce them as they  
33 are kept in the usual course of business or shall organize and label them to correspond  
34 with the categories in the request.

35 (c)(2) If a request does not specify the form or forms for producing electronically  
36 stored information, a responding party must produce the information in a form or forms  
37 in which it is ordinarily maintained or in a form or forms that are reasonably usable.

38 (c)(3) A party need not produce the same electronically stored information in more  
39 than one form.

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