

“Unemployment Compensation”

Entriksyon Pou ou Mandé sa ki rele “Discovery” a

Si ou gen on ka ki ap tan-n on repons nan biro Apél “unemployment compensation”, ou pral bezwen mande ansyen patron ou sa ki rele “*discovery*” a. “*Discovery*” se tout kalite dokiman o sinon lòt enfòmasyon ki empòtan nan ka ou a. Objektif “discovery” a se pou ou genyen on opòtinite pou ou revize tout dokiman ki pral prezante nan jijman ou a. Nan paragraf ki apré sa-a men etap pou ou swiv pou ou fé demand sa-a:

1st Demand Prodiksyon

- ▶ Ranpli fòm ki rele “Request for Production” an.
- ▶ Pote fòm sa-a bay ansyen patron ou an. Si ou pa kapab pote fòm sa-a an pèsòn-n, ou ka voye li ale pa lét sétifye avék on resi ki ap tounen vin-n jwen ou.
- ▶ Si ou pa resevwa on repons nan 3 jou ale nan lòt etap la.

2nd Mosyon pou “Order to Compel Discovery”

- ▶ Ranpli fòm ki rele “Motion to Compel Discovery” a
- ▶ Voye fòm sa-a nan Biro Apél nan Miami pa faks nan:
Faks: 305-377-5328
- ▶ Kenbe on fotokopi mosyon sa-a ke ou voye ale a

AGENCY FOR WORKFORCE INNOVATION
MIAMI APPEALS OFFICE

DOCKET NO.

Claimant
Claimant,
v.

Employer.

REQUEST FOR PRODUCTION

Claimant requests, pursuant to Rule 60BB-5.018, Florida Administrative Code, and Rule 1.350(b), Rules of Civil Procedure, that the employer in the above referenced case produce to the claimant within three (3) business days of the date of this request the following:

1. A copy of the complete employee file of the claimant.
2. A copy of the written policies, procedures, or rules, such as employee handbooks, that govern the conduct of the employer's employees.
3. A copy of the documents that the employer intends to submit as evidence at the hearing.
4. A list of the witnesses that intend to testify on behalf of the employer at the hearing with a statement as to what each of the witnesses will testify to.
5. A copy of all written warnings given to claimant, if any.
6. A copy of the separation letter or memorandum, if any.
7. A copy of all memoranda, documents, and letters related to the separation of the claimant from employment.
8. Additionally, produce the following:_____.

If the employer refuses to comply with this Request for Production, the claimant will move for an Order to Compel Discovery pursuant to Rule 60BB-5.018, Florida Administrative Code, and Rule 1.380, Rules of Civil Procedure.

I HEREBY CERTIFY that a copy of this request was delivered to the employer at the above address this _____ day of _____, 2009.

Respectfully Submitted,

AGENCY FOR WORKFORCE INNOVATION
MIAMI APPEALS OFFICE

DOCKET NO.

Claimant,

v.

Employer

[address]

Employer.

MOTION FOR ORDER TO COMPEL DISCOVERY

Claimant moves, pursuant to Rule 60BB-5.018, Florida Administrative Code, and Rule 1.380, Rules of Civil Procedure, that the appeals referee in the above referenced case issue an Order to Compel Discovery ordering the employer to produce at least five (5) days prior to the hearing, the following discovery:

1. A copy of the complete employee file of the claimant.
2. A copy of the written policies, procedures, or rules, such as employee handbooks, that govern the conduct of the employer's employees.
3. A copy of the documents that the employer intends to submit as evidence at the hearing.
4. A list of the witnesses that intend to testify on behalf of the employer at the hearing with a statement as to what each of the witnesses will testify to.
5. A copy of all written warnings given to claimant, if any.
6. A copy of the separation letter or memorandum, if any.
7. A copy of all memoranda, documents, and letters related to the separation of the claimant from employment.

8. Additionally, produce the following: _____

_____.

9. The employer refused to voluntarily disclose discovery which is necessary to present claimant's case at the hearing.

10. Specifically, claimant attempted to obtain voluntary discovery by [describe in detail what you did and how the employer refused]: _____
_____.

WHEREFORE, claimant requests that an order compelling discovery be issued.

I HEREBY CERTIFY that a copy of this request was delivered to the employer at the above address this _____ day of _____, 2009.

Respectfully submitted,

(Claimant)

(Claimant's address)

(Claimant's telephone no.)