Sample Discovery Request Letter

[Name of counsel for DHS]:

I represent [name of client], the [mother/father/child] in case number [case number]. Pursuant to ORS 419B.881, I hereby request disclosure and production of the following documents and materials as soon as practicable, but no later than [30 days after the filing of the dependency petition].

* The names and addresses of all persons whom the Department of Human Services (DHS) intends to call as witnesses, together with any relevant written or recorded statements or memoranda of any oral statements of such persons;
* Any written or recorded statements or memoranda of any oral statements made either by the parent or by the child to any other party or agent for any other party;
* Any reports or statements of experts who will be called as witnesses, including the results of any physical or mental examinations and of comparisons or experiments that DHS intends to offer in evidence at the hearing, including, but not limited to any medical records; child advocacy center reports, interviews, or examinations; drug and alcohol assessments and treatment records; mental health records related to the child or parent(s); CANS evaluations; and
* Any books, papers, documents or photographs that the Department of Human Services intends to offer in evidence at the hearing, or that were obtained from or belong to any other party.

In particular, [mother/father] requests disclosure and production of any written documentation relating to DHS contact with this family, including but not limited to CPS assessments and referrals; reports; contacts; caseworker log notes; OR Kids notes; visit notes; records of meeting; correspondence; safety plans; action agreements; protective action plans; records or notes from ISRS providers; [specify other documents/materials here if necessary];and any other records or communications between DHS and the parties in this case.

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