
Name

Address

Telephone

Fax (Optional)

Email (Optional)

STATE OF CALIFORNIA
DEPARTMENT OF RESOURCES RECYCLING & RECOVERY

In the matter of: _____) **REQUEST FOR DISCOVERY**
_____) **(Government Code Section 11507.6)**
_____) **ENFORCEMENT CASE NO: _____ - _____**
_____)
_____)
_____)
_____)

I, _____ (“Requesting Party”) request the following discovery from the Department of Resources Recycling & Recovery (“CalRecycle”), as prescribed under Government Code Section 11507.6:

1. The names and addresses of all witnesses to the extent known by CalRecycle, including, but not limited to, those CalRecycle intends to call to testify at the hearing, and
2. An opportunity to inspect and make a copy of each of the following that are under CalRecycle’s possession, custody, or control (Government Code section 11507.6(a)-(f)):
 - a. statements of persons (including entities), other than the Requesting Party, named in the initial administrative pleading or any additional pleading, when it is claimed in the pleading that any act or omission of the Requesting Party regarding such person or entity is the basis for this administrative proceeding;
 - b. statements pertaining to the subject matter of the proceeding made by any party to another party or person;

- c. statements not included in (a) or (b) above of witnesses proposed by CalRecycle to be called to testify and of other persons having personal knowledge of the acts, omissions, or events that are the basis for the proceeding;
- d. all writings, including, but not limited to, reports and things that CalRecycle proposes to offer in evidence;
- e. any other writings or things that are relevant and would be admissible in evidence; and
- f. investigative reports made by CalRecycle or on its behalf or any other party pertaining to the subject matter of the proceeding, to the extent that these reports:
 - i. contain the names and addresses of witnesses or of persons having personal knowledge of the acts, omissions, or events that are the basis for the proceedings,
 - ii. reflect matters perceived by the investigator during his or her investigation, or
 - iii. contain or include by attachment any statement or writing described in (a) to (e) above, or a summary thereof.

Specifically, in addition to any other response to the discovery requested above, Requesting Party requests the following evidence relevant to this matter:

This request is not intended to require inspection, copying, or production of any writing or thing that is privileged from disclosure by law, protected as attorney work product, or otherwise made confidential.

This is a continuing request for discovery of the information and materials stated above and includes such information and materials that may come into CalRecycle’s possession, custody, or control at any time before the hearing.

Signature: _____

Date: _____

**Please send completed form to:
 CalRecycle Legal Office
 Attention: Daniel A. Zlatnik
 P.O. Box 4025, MS 24B
 Sacramento, CA 95812-4025**