

Rule 7034-1

**OBJECTIONS TO, AND REQUESTS FOR RELIEF WITH RESPECT TO,
PRODUCTION OF DOCUMENTS**

a) In connection with any objection or request for relief with respect to document requests or answers thereto, the party making the objection or request for relief shall (i) simultaneously file a copy of the document request or answer and (ii) specify and quote verbatim each relevant document request or answer and, immediately following each specification, set forth the basis of the objection or relief requested.

(b) If an objection or request for relief is made with respect to any document request or portion thereof, the objection or request for relief shall state all grounds with specificity. Any ground not stated in the objection or request for relief within the time provided by the Bankruptcy Rules, or any extensions thereof, shall be deemed waived.

(c) If a claim of privilege is asserted in an objection or request for relief with respect to any document request or portion thereof, and an answer is not provided on the basis of the assertion, the objection or request for relief shall identify:

(1) the nature of the privilege being claimed and, if the privilege is being asserted in connection with a claim or defense governed by state law, the state's privilege rule being invoked; and

(2) unless divulgence of such information would cause disclosure of the allegedly privileged information: (i) the type of document; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) such other information as is sufficient to identify the document for a subpoena duces tecum, including, where appropriate, the author of the document, the addressee of the document, and, where not apparent, the relationship of the author to the addressee, and the names of all entities that received a copy of the document.

Comment

This rule is derived from Former Local Bankruptcy Rule 14(e). Subdivision (a) of this rule is new and has been added to conform to subdivision (e)(1) of Local Bankruptcy [Rule 7033-1](#). Subdivision (c)(2) of this rule has been modified to conform to subdivision (e)(3)(B)(1) of Local Bankruptcy Rule 7033-1.