

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

Jessica Nicole Henderson,

Plaintiff Pro Se,

Case No. 05771 LACL 164866

v.

Requests for Production of Documents
Propounded to Defendant,
Timothy P. Hegwood

M and B Scott Properties, LLC,
Andrew Kenneth Miles Scott,
Summer Lynn Scott,
Scott's Home Renewal, LLC
Timothy P. Hegwood
Christopher Fisher, and
CF Consulting Corp, d/b/a PMI Realty Iowa,
and d/b/a Property Management Inc. – Central Iowa,
a/k/a PMI Central Iowa,

Defendants.

COMES NOW the Plaintiff, Jessica Nicole Henderson, and pursuant to Iowa Rules of Civil Procedure 1.500(1) and 1.512, requests that Defendants, Timothy P. Hegwood, produce the following documents by delivering via email or postal mail to Plaintiff, Jessica Henderson, or allow for inspection and/or copying at a location and time agreed upon by the Plaintiff, within thirty (30) days of the date of this request.

You are hereby notified that at the commencement of the trial of this case, the undersigned will ask the Court for an order precluding you from introducing documents or other evidence requested herein which have not been disclosed by your responses or otherwise produced.

I. INSTRUCTIONS

A. In each response to these requests for production, provide all information in your

possession, custody or control. If you are able or willing to provide only part of the information sought, specify the reason for your inability or unwillingness to provide the remainder.

- B. If you decline to provide any portion of the documents requested, provide all information called for by the balance of the request for production. If you object to any portion of a request for production on any ground, provide all information called for which is conceivably discoverable.
- C. Where knowledge or information in your possession is requested, such request includes knowledge of your agents, representatives, and, unless privileged, your attorneys.
- D. If any privilege is claimed with respect to any communication or document, identify the communication or document in detail, including its date, author, and each addressee or recipient, describe its subject matter, and state the privilege claimed and the basis, therefore.
- E. If any such document was, but is no longer, in your possession or subject to your control, or is no longer in existence, state whether it is:
 - (1) Missing or lost;
 - (2) Destroyed;
 - (3) Transmitted or transferred voluntarily or involuntarily to others, identifying such others; or
 - (4) If otherwise disposed of, explain each such instance, the circumstances surrounding the authorization for such disposition of, and state the date or approximate date thereof.
- F. If any of the information requested is not available to you, state any other available

means of identifying such documents. If you are claiming that certain documents are privileged, you must nonetheless identify them and state the entire factual legal basis supporting your claim of privilege.

II. DEFINITIONS

- A. The singular shall include the plural and the past shall tense shall include the present tense, and vice versa; the words “and” and “or” shall be both conjunctive or disjunctive; the word “all” means “any and all”; the word “any” means “any and all”; the word “including” means “including without limitation”; the word “he” or any other masculine pronoun includes any individual regardless of sex or gender.
- B. "Person" includes a natural person, partnership, corporation, unincorporated business, group, governmental agency or agent, and any other organization or entity.
- C. As used herein, "including" means including but not limited to.
- D. "Communication" means any transfer or exchange between two or more persons of any information, whether orally or in writing, including, but not limited to, personal conversations, correspondence, electronic messages via email or other means, and telephone calls, and includes all communications for which you may claim privilege.
- E. “Subject property” means the property located at 1713 Francis Avenue, Des Moines, Iowa 50314, which is the subject matter of this litigation.
- F. "Document" means the original and any nonidentical copy (whether different from the original by reason of notations, or otherwise) of any written, printed, typed, recorded, graphic or photographic matter, sound reproduction, tape, record or other device, and electronically stored information, however produced or reproduced including drafts and supporting statements. "Document" includes, but is not limited to, agreements,

memoranda, records, letters, correspondence, communications, reports, manuals, brochures, schedules, books, newspapers, magazines, articles, applications, contracts, agreements, telephone logs, notes, handwritten notes, invoices, orders, price lists, check lists, checks, drafts, notices, instructions, statements, minutes, resolutions, tests, studies, experiments, telephone reports, notepads, desk calendars, graphs, charts, data sheets, processing cards, printouts, tape recordings, microfilm, microfiche, photographs, video tape recordings, magnetic recording media, computer printouts and any data compilations, or any other physical object. "Document" also means identical copies of unavailable original documents and of unavailable, nonidentical copies.

- G. "Electronically stored information" means information which has been electronically stored, that is, computer data in a computer-readable form, a data base, a file, and/or a record.
- H. When used in connection with a document, "identify" means to state its type (e.g., letter, memorandum, email message, report, drawing, etc.), subject matter and date, by whom written or prepared, by whom signed, to whom sent, its present location (name and address of place), and the present custodian of the original and all copies thereof. If any such document was, but no longer is, in your possession or custody or subject to your control, state what disposition was made of it.

RESPECTFULLY SUBMITTED,

/s/ Jessica Henderson

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Attorney for Defendants, Timothy P. Hegwood, Christopher Fisher, and CT Consulting Corp, d/b/a PMI Realty Iowa, and d/b/a Property Management Inc. – Central Iowa, a/k/a PMI Central Iowa

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon each of the attorneys of record for all Defendants to the above-entitled cause herein at their respective addresses disclosed on the pleadings of record on the 14th day of April, 2026.

By U.S. Mail Fax
 Hand Delivery Electronically through CM-ECF
 Private Carrier Other __ Email _____

Signature /s/ Jessica Henderson

REQUESTS FOR PRODUCTION

1. Please provide copies of all lease agreements signed by the parties for the subject property from 2018 through 2025.

RESPONSE:

2. Please provide a complete copy of all work orders, maintenance requests, and written communication from Plaintiff or previous tenants regarding repairs, maintenance, upkeep, damage, and other requests relating to leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, nonfunction or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, roof damage, broken pipes, structural problems, or remediation of water or mold at the subject property over the past ten years.

RESPONSE:

3. Please provide a complete copy of all invoices prepared by you, or any party in this litigation for purposes of repairs, maintenance, upkeep, damage, construction, materials and other costs relating to leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, nonfunction or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, broken pipes, structural problems, or remediation of water or mold at the subject property over the past ten years.

RESPONSE:

4. A complete copy of all checks made payable to you or any entity or individual to pay the costs associated with any repairs to the subject property and to pay the invoices presented in response to Request for Production No. 2.

RESPONSE:

5. Please provide a complete copy of all testing performed on the subject property, including all source data sheets, lab reports, final analysis reports, intermediary analysis reports, or other information establishing the type, including genus and species, of any mold or bacteria which was found in the subject property.

RESPONSE:

6. Please provide complete copies of all photographs, videotapes, digital photographs, digital recordings, including voice recordings taken of any portion of the subject property, or any person, pertaining to any issue concerning the subject property, as well as those same types of records taken of the Plaintiff when she was under surveillance or observation in connection with this action.

RESPONSE:

7. Please provide complete copies of any and all documents, reports, and/or recorded material documenting or relating to the investigation, surveillance or observation of Plaintiff or any member of Plaintiff's family, or any fact or expert witness in this matter.

RESPONSE:

8. Please provide a complete copy of all training manuals, in-house manuals, local, state or national ordinances, or statutes, regulations, rules, procedures or guidelines relied upon by these defendants, in the evaluation, inspection, remediation, testing, and analysis of damages related to mold.

RESPONSE:

9. A complete copy of all petitions, complaints or claims filed against you, pertaining to unsafe, unsanitary or uninhabitable conditions, or health concerns attributed by tenants to those conditions, in any of the properties you owned (or did own) in the past ten years, including leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, non-function or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, roof damage, broken pipes, structural problems, or remediation of water damage or mold, or negligence in the testing, remediation, or containment of mold.

RESPONSE:

10. Please provide a complete copy of all documents or materials relied upon by you, or your experts concerning the health effects, exposure levels, or personal injuries, associated with mold exposure.

RESPONSE:

11. A complete copy of exhibits you intend to introduce at trial in this matter.

RESPONSE:

12. If any samples or materials have been taken from the subject property, for which you or your agents have possession, the Plaintiff requests a viewing, and potential sampling of said materials.

RESPONSE:

13. Copies of tax returns for the Defendants, individually and as a business entity, for 2018 through 2025.

RESPONSE:

14. Copies of any and all documents or records which evidence statements or admissions made by the Plaintiff and/or Defendants in this case.

RESPONSE:

15. Copies of any and all documents or records which any agreements or understandings, implied or express, oral or written, between Plaintiff and/or Defendants in this case.

RESPONSE:

16. Copies of any and all documents or records which suggest that Defendants were negligent in this case.

RESPONSE:

17. Copies of any and all documents or records which evidence statements or admissions made by any third parties or entities that refer or otherwise relate to this case.

RESPONSE:

18. Copies of any and all remediation plans prepared for, or by, Defendants or others for the remediation of the subject property. For each document, please provide a complete copy of all change orders or similar documents modifying the remediation plan proposed by the Defendants or other companies regarding the subject property.

RESPONSE:

19. Copies of any and all procedural manuals, best practice guides, or other similar documents used by Defendants or other parties involved in the planning or execution of remediation.

RESPONSE:

20. Copies of any and all source materials and opinions relied upon by you or your experts.

RESPONSE:

21. Copies of compensation agreements with each of your experts.

RESPONSE:

22. Copies of any and all correspondence received from or directed to your company regarding the subject property.

RESPONSE:

23. Copies of any and all correspondence and reports regarding post-remediation testing performed on the subject property.

RESPONSE:

24. Copies of any and all documents or materials, including peer-reviewed, published scientific research papers, relied upon by you or your experts concerning the health effects, exposure levels, pathophysiology, medical tests, treatments, or other related information associated with mold exposure.

RESPONSE:

VERIFICATION BY DEFENDANT

I hereby certify under penalty of perjury and pursuant to the laws of the State of Iowa that I have read the above and following Requests for Production of Documents and that said answers are true and correct as I verily believe.

Dated: _____

Defendant, Timothy P. Hegwood