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| **STATE OF WISCONSIN CIRCUIT COURT** **BRANCH**  |  **COUNTY** |  |
| In the  |
| [EXAMPLES OF REQUESTS FOR PRODUCTION OF DOCUMENTS; USE ONLY THOSE THAT APPLY TO YOUR CASE] |

TO: [petitioner]

The Respondent, [name], by counsel, [name], requests that the Petitioner, [name of petitioner], fulfill the following discovery demand within thirty (30) days from the date of service of this discovery document, in accordance with Wis. Stat. §§ 48.293, 804.01, 804.08, 804.09, and 804.11.

**INSTRUCTIONS FOR REQUEST FOR PRODUCTION OF DOCUMENTS**

 [name], as custodian of the requested records, is requested to produce the documents specified below for inspection and copying at the Law Offices of the Wisconsin State Public Defender located at [address], by **[date]** In lieu thereof, Atty. [name] may arrange, with Atty. [name], a mutually agreeable alternative time or method to produce the requested documents for inspection and copying.

 If Petitioner objects to the release of all or part of any document requested, the reasons for the objection must be stated.

 “All records relating to a child . . . that are relevant to the subject matter of a proceeding under this chapter shall be open to inspection by . . . counsel for any party . . ..upon demand and upon presentation of releases when necessary[.]” Wis. Stat. § 49.293. Discovery may be had regarding any matter which is not privileged and which is relevant to the subject matter involved in the proceeding. Wis. Stat. § 804.01.

**DEFINITIONS**

 “You” or “your” includes, but is not limited to, yourself as Petitioner in the above-captioned matters, your agents, your employees, and for the purposes of this Discovery request only, the [name of county] County Department of Human Services and any social worker or employee therein.

 “Department” refers to the [name of county] County Department of Human Services involved with and managing the underlying CHIPS case(s), [case number(s)].

**REQEUESTS FOR PRODUCTION OF DOCUMENTS**

1. Produce any and all Department entry into the SACWIS Notes system for the child’s case, including, but not limited to, any and all entries into the SACWIS Notes system prior to the filing of the Petition in the CHIPS case, any and all entries into the SACWIS Notes system prior to disposition in the CHIPS case, and any and all entries into the SACWIS Notes system on or after disposition in the CHIPS case and until the date of this discovery request. This includes documents from both the child’s social worker and the substitute-care foster care worker assisting the child’s foster parents.
2. Produce any and all Department entry into the COMPAS system for the child’s case, including, but not limited to, any and all entries/documents put into the COMPAS system prior to the filing of the Petition in the CHIPS case, any and all entries into the COMPAS system prior to disposition in the CHIPS case, and any and all entries into the COMPAS system on or after disposition in CHIPS case and until the date of this discovery request. This includes documents from both the child’s social worker and the substitute-care foster care worker assisting the child’s foster parents.
3. Produce any and all Department correspondence regarding the child’s case, including, but not limited to, emails (including attachments), letters, texts, messages, or any other written communication to/from social workers, foster parents, corporation counsel, the guardian *ad litem*, service providers, or other Department employees. This includes documents from both the child’s social worker and the substitute-care foster care worker assisting the child’s foster parents. This also includes all emails sent between any Department employee and the parent.
4. Produce any and all notes, logs, and/or other written records that are in the custody of the foster parent(s) of the child or the Department, including any records created by the foster parent(s). This includes documents from both the child’s social worker and the substitute-care foster care worker assisting The child’s foster parents.
5. Produce any and all records relating to the medical history and/or medical treatment of The child that are in the custody of the foster parent(s) of the child, the medical care providers who have treated her since the filing of the Petition in the CHIPS case, or the Department.
6. Produce any and all records relating to the educational history and/or schooling of The child that are in the custody of the foster parent(s) of The child, the school in which she attends, or the Department.
7. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the investigation of any report or allegation regarding suspected child abuse or neglect, or any report or allegation of a child being in need of protection or services.
8. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the supervision and/or provision of services under a CHIPS dispositional order.
9. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the foster parent services, supervision and/or provision of services under a CHIPS dispositional order.
10. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), which is used to prepare or draft court reports to be utilized in CHIPS proceedings, as well as any guidelines or documentation used to prepare proposed conditions for a CHIPS order.
11. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the format and/or responsibilities of social workers, foster care workers, and supervisors regarding staffing generally held to discuss the progress of a client or client family.
12. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), used to determine when a petition for termination of parental rights should be filed in regard to a case file.
13. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the record-keeping or documentation responsibilities or guidelines in place for intake workers, social workers, and foster care workers.
14. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), used to assess and respond to requests for change in assigned case workers or decisions that case workers have made when the request is initiated by the parent or a client.
15. Produce a copy of the policies and procedures manual, or documentation utilized by the Department, during the span of the CHIPS case (including prior to disposition), with regard to the parameters or appropriateness of visitation between a child and parent, particularly in those instances when the parent is incarcerated.
16. Produce a list of all in-house training provided to the Department since the date of filing the CHIPS petition in the CHIPS case. “In-house” refers to all training provided either on-site (regardless of the provider or trainer), as well as all training provided by representatives of the Department (regardless of the location of such training). For each such training, provide the title of the training, the sponsor and/or provider of the training, the location of the training, the date of the training, the length of the training, and whether the training was mandatory or voluntary.
17. Produce the written job description for Department intake and ongoing social workers.
18. Produce a report of any witness who may be called to provide an expert opinion in this case, with such report describing the expert opinion to be offered, the factual basis for the opinion, the expertise of the witness, and any other relevant information regarding the proffered opinion.
19. Produce a list of any witness who may be called at trial, lay or expert.
20. Produce all records, reports, memoranda, and photographs/images relied upon by the Petitioner in preparation for filing the Petitions in the TPR and CHIPS case.
21. Produce a list of names of any person, business, entity, or position, and the address and phone number of each that may have knowledge of the relevant facts involved in this pending action.
22. Re-produce any answer/response to any discovery demand by the Respondent Mother and provide it to the Respondent Father, as well.
23. Produce any and all records of any trainings, courses, continuing education, learning opportunities, etc., that Erin Salzwedel has participated in since she began her employment at the Dane County Department of Human Services; this includes, but is not limited to, any “training log” kept to track her continuing education and any materials in her possession (or in the Department’s possession) related to or from such educational experiences.
24. Produce any and all records of any trainings, courses, continuing education, learning opportunities, etc., that Hannah Graber has participated in since she began her employment at the Dane County Department of Human Services; this includes, but is not limited to, any “training log” kept to track her continuing education and any materials in her possession (or in the Department’s possession) related to or from such educational experiences.
25. Produce any and all records of contracts, memoranda of understanding, or evidence of professional relationships that the Department had with any service providers (such as, for example, Family Services or YWCA or DAIS) during the period of time from the date of the dispositional order in 18-JC-26 and 18-JC-106 to the present.