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1. a copy of all of the chain of custody documents including intra-laboratory documents for the sample(s) in question

2. a copy of the analytical method used to perform all analytical tests on any specimen including the written method, the method software used and the method software settings and any method validation studies performed for the test results in question

3. a copy of all maintenance records of the instrument used in the analysis for previous 12 months including any software and/or hardware updates, patches, repairs, replacements

4. a copy of any repair records of the instrument used in the analysis for the previous 12 months

5. a copy of the qualifications, certifications, licenses, and permits of any individual performing analysis of the specimen in question

6. a copy of the instrumental raw data of all quality control and calibrator tests performed during the analysis of the defendant samples in question (on CD or flash drive)

7. a copy of the instrumental raw data of the analytical tests performed on all the defendant samples themselves (on CD or flash drive)

8. a copy of the instrumental raw data of the analytical tests performed on all proficiency samples analyzed for the twelve month period prior to the defendant sample (on CD or flash drive)

9. a clear high resolution copy of all chromatograms and calibration tables of calibrators, controls and samples

10. a clear high resolution copy of all chromatograms and calibration tables of any reference standards used in the method validation or sample analysis

11. quality control data (e.g. Levi-Jennings charts) for the previous six months

12. a copy of any proficiency tests performed for a given analysis (blood ethanol, blood drug, urine drug) during the most recent six month period

13. calibration data for any weight and measuring device used in the analysis (i.e., pipettors and scales)

14. sample worklist and chromatograms and results for all samples analyzed with the subject (defendant) samples

15. a description of the samples analyzed including specimen type, amount, collection (storage) container, current availability and temperature history of the defendant samples from the time of initial collection to current date

16. A copy of all correspondence (including emails and hand written notes), regarding the testing of any and all samples in this case

17. A description and documentation of laboratory compliance with ASTM / ISO 17025 standards if such compliance was in effect when the subject sample(s) were tested including any statement of uncertainty regarding the quantitative results and all data and calculations used in the determination of any statement of uncertainty

18. If no ASTM / ISO standard was in effect, then a description and documentation of the good laboratory standard that was in effect when the subject sample(s) were tested including any statement of uncertainty

regarding the quantitative results and all data and calculations used in the determination of any statement of uncertainty

19. The current good laboratory standard in effect if different than included in 17), 18) above including any statement of uncertainty regarding the quantitative results and all data and calculations used in the determination of any statement of uncertainty

20. A copy of all documents transmitted in any fashion to and from the laboratory and any accreditation entity during the accreditation period in effect at the time of the subject sample test results.

21. All documents provided by the manufacturer to the laboratory and/or laboratory staff in any fashion, including, but NOT limited to manufacturer manuals, operating manuals, protocol documents, recommended processes, "package inserts," and any other manufacturer literature whatsoever for any instrument used to test samples related sought in this discovery request.