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5 IN THE CIRCUIT COURT OF THE STATE OF OREGON
6 FOR THE COUNTY OF MULTNOMAH

7 MICHAEL J. FAUNCE

8 Plaintiff,

9 v.

10 HYUNDAI MOTOR AMERICA, a foreign
11 corporation, and BEAVERTON HYUNDAI,
12 INC., an Oregon corporation,
Defendant.

Case No. 26CV28133

DEFENDANT HYUNDAI MOTOR
AMERICA'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO
PLAINTIFF

13 TO: Plaintiff Michael J. Faunce

14 Pursuant to ORCP 36 and 43, Defendant Hyundai Motor America ("HMA" or
15 "Defendant") requests that Plaintiff produce the documents and permit inspection of the subject
16 vehicle, as specified below. Documents should be produced to the office of Defendant's counsel,
17 Martin Bischoff, LLP, 620 SW 5th Avenue, Suite 300, Portland, Oregon 97204, within thirty (30)
18 days of service of this request unless a different date is mutually agreed upon. In lieu of such
19 production, Plaintiff may submit legible photocopies of the documents to Defendant's counsel on
20 or before the date set herein. This request for production shall be deemed continuous and shall call
21 for the production of all documents and information which may come into the possession of
22 Plaintiff at any time after the receipt of this request for production.

23 If Plaintiff contends that any document is privileged in whole or in part, or otherwise
24 objects to any part of any request, or believes that any identified document would be excludable
25 from production to Defendant in discovery regardless of its relevance, Plaintiff shall identify with
26 particularity each document for which Plaintiff objects or claims a ground for exclusion, identify

1 each person or entity having knowledge of the actual basis if any, on which the privilege or other
2 ground is asserted, and identify each document in any way related to either the privileged
3 information or the factual basis for the claim of privilege.

4 **DEFINITIONS**

5 **1. Document** – When used in this request, the term “document” shall be used in its
6 broadest sense so as to include recorded information in any form, and shall include without
7 limitation both an original and any non-identical copy, writing, any printed or graphic
8 representation, catalogue, circular, advertisement, brochure, label, manual, report, letter,
9 memorandum, drawing, sketch and note. The term “documents” shall also include any information
10 stored in, maintained on or accessible through computers, disk drives, or other electronic storage
11 media, or other information storage or retrieval systems including without limitation program files,
12 data files and data compilations from which information can be obtained (translated, if necessary,
13 by you, into a reasonable useable form), together with the codes or programming instructions and
14 other materials necessary to understand and use such systems.

15 **2. Person** – When used in this request, the term “ person” includes any individual,
16 partnership, corporation or other business or legal entity, unincorporated association, or society,
17 municipal or other corporation, local, state or federal government, their agencies or political
18 subdivisions, and any court or governmental agency. The singular shall include the plural, and the
19 male shall include the female.

20 **3. Photograph** – When used in this request, the term “photograph” shall mean any
21 visual photographic or electronic reproduction of any type whatsoever, including without
22 limitation negatives, slides, photographs, motion pictures, films, videotapes and computer graphic
23 files.

24 **4. You/Your** – when used in this request, the term “you” or “your” shall refer to the
25 party to whom this request is directed, and shall include anyone acting on behalf of that party, over
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1 whom that party has control, or which is, or may be, subrogated to that party's interests, including
2 without limitation any officer, agent, servant, employee, insurance company, investigator,
3 independent adjusting company, or other persons or entity.

4 **5. Relating to** – “Relating to” or “related to” means concerning, referring to, alluding
5 to, responding to, in connection with, commenting on, in response to, about, regarding,
6 announcing, explaining, discussing, showing, describing, studying, reflecting, analyzing or
7 constituting.

8 **6. Subject Vehicle** – “Subject Vehicle” means the Hyundai vehicle referenced in
9 Plaintiff's Complaint.

10 **REQUESTS FOR PRODUCTION OF DOCUMENTS**

11 **REQUEST FOR PRODUCTION NO. 1:** Please produce all documents related to
12 Plaintiff's purchase or acquisition of the Subject Vehicle, including (a) the sale or lease contract;
13 (b) order forms; (c) financing documents; and (d) extended-service contracts.

14 **RESPONSE:**

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17 **REQUEST FOR PRODUCTION NO. 2:** Please produce all documents concerning the
18 purchase price for the Subject Vehicle.

19 **RESPONSE:**

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22 **REQUEST FOR PRODUCTION NO. 3:** If you received financing in connection with
23 the purchase or lease of the Subject Vehicle, please produce all documents concerning the
24 financing and the amount currently owed thereon.

25 **RESPONSE:**

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2 **REQUEST FOR PRODUCTION NO. 4:** Please produce all documents identifying the
3 names, addresses, and telephone numbers of any and all person who have inspected or repaired
4 the Subject Vehicle.

5 **RESPONSE:**
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7 **REQUEST FOR PRODUCTION NO. 5:** Please produce all repair orders, receipts, bills,
8 invoices, statements, or other records relating to any repairs, inspection, or other work to the
9 Subject Vehicle.

10 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 6:** Please produce all records of communication
13 (written or verbal) with Defendant HMA and/or its representatives relating to the Subject Vehicle.
14 This request is meant to include written correspondence or emails with HMA and/or its
15 representatives related to the Subject Vehicle.

16 **RESPONSE:**
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18 **REQUEST FOR PRODUCTION NO. 7:** Please produce all written correspondence
19 between Plaintiff and any other person or entity, including, without limitation, any vehicle
20 dealership, auto body shop, or consumer organization (e.g., Better Business Bureau, etc.) relating
21 to the Subject Vehicle or the subject matter of this lawsuit.

22 **RESPONSE:**
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1 **REQUEST FOR PRODOUTION NO. 8:** Please produce a copy of any journal or diary
2 entries, notes, or other writings by Plaintiff documenting Plaintiff's vehicle complaints and/or
3 communications with Defendant HMA or the dealership with respect to the Subject Vehicle.

4 **RESPONSE:**

6 **REQUEST FOR PRODUCTION NO. 9:** Please produce all records identifying or
7 describing the number of days the Subject Vehicle has not been in Plaintiff's possession for
8 repairs and/or warranty services.

9 **RESPONSE:**

11 **REQUEST FOR PRODUCTION NO. 10:** Please produce all records relating to any
12 examination, inspection, or testing of the Subject Vehicle from the date of purchase/lease to the
13 present.

14 **RESPONSE:**

16 **REQUEST FOR PRODUCTION NO. 11:** Please produce all documents related to
17 Plaintiff's sale or potential sale of the Subject Vehicle, even if not completed, including
18 advertisements posted by you, communications with potential buyers, offers made, and
19 Communications about a trade-in or trade-in value offered by a dealership.

20 **RESPONSE:**

22 **REQUEST FOR PRODUCTION NO. 12:** Please produce any documents related to your
23 allegation that "[t]he vehicle was marked and sold...with an EPA combined fuel economy rating
24 of approximately 37 MPG," as alleged in Paragraph 2 of the Complaint. This request is meant to
25 include any documents, advertisements, marketing materials, etc. that Plaintiff reviewed or relied
26 upon prior to purchase related to the Subject Vehicle's fuel efficiency.

1 **RESPONSE:**

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4 **REQUEST FOR PRODUCTION NO. 13:** Except as already produced in response to

5 the foregoing requests, please produce documents supporting your allegation in the Complaint that

6 the Subject Vehicle has lower fuel efficiency than that estimated by the EPA.

7 **RESPONSE:**

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9 **REQUEST FOR INSPECTION**

10 **REQUEST FOR INSPECTION NO. 1:** Defendant requests an opportunity to inspect

11 the Subject Vehicle at a time/place mutually agreeable to the parties.

12 **RESPONSE:**

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14 DATED: July 17, 2026.

15 MARTIN BISCHOFF, LLP

16

17 /s/ Michael Yoshida

18 Michael A. Yoshida, OSB No. 065631

19 myoshida@mbglaw.com

20 620 SW 5th Avenue, Suite 300

21 Portland, OR 97204

22 Phone: 503-382-4297

23 Attorney for Defendant HMA

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CERTIFICATE OF SERVICE

I hereby certify that on July 17, 2026, I served the foregoing DEFENDANT HYUNDAI MOTOR AMERICA'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF on the plaintiff listed below by causing a true copy thereof to be served in the manner specified below:

Michael J. Faunce
158 Oswego Summit
Lake Oswego, OR 97035
Pro Se Plaintiff

☒ U.S. Mail, postage prepaid
☒ Electronic mail to:
mjfaunce@gmail.com

MARTIN BISCHOFF, LLP

Michael A. Yoshida, OSB No. 065631
myoshida@mbglaw.com
Attorney for Defendant HMA