

Permissible Discovery in Lemon Law Cases

The parties are entitled to the following:

1. Purchase and/or lease contract concerning the subject vehicle.
2. Repair orders and invoices concerning the subject vehicle.
3. Communications with dealer, factory representative and/or call center concerning the subject vehicle.
4. Warranty claims submitted to and/or approved by defendant concerning the subject vehicle.
5. Any Warranty Policy and Procedure Manual published by defendant and provided to its authorized repair facilities, within the State of California, for the date the subject vehicle was purchased to the present.
6. Any internal analysis and/or investigation regarding defects claimed by plaintiff in vehicles for the same year, make and model of the subject vehicle.
7. Documents that evidence any policy and/or procedure used to evaluate customer requests for repurchase pursuant to the Song-Beverly Consumer Warranty Act, from the date of purchase to the present.
8. Other customers' complaints similar to the alleged defects claimed by plaintiff, limited to vehicles purchased in California for the same year, make and model of the subject vehicle.
9. Technical Service Bulletins and/or Recall Notices for vehicles purchased in California for the same year, make and model of the subject vehicle, whether mentioned in the repair history of the subject vehicle or not.
10. Any documents supporting plaintiff's claim for the incidental and/or consequential damages.