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REQUEST NO. 1: Legible copies of all Federal and State Income Tax Returns including all schedules, forms, attachments, and other supporting documents or writings for each such return for each year during the discovery period.

REQUEST NO. 2: Legible copies of all statements for each month of each year during the discovery period for any accounts at any financial institution, including, but not limited to, checking accounts, savings accounts, money market accounts, time deposit accounts, retirement accounts, pension plan accounts, profit sharing plan accounts stock purchase plan accounts, annuity accounts, stock accounts, bond accounts, ready asset accounts, mutual fund accounts, loan accounts, credit accounts, mortgage accounts, or any similar such accounts.

- a. Legible copies of all cancelled checks, voucher portions of checks, or any other document or writing evidencing withdrawals or transfers of funds from each account for which statements are produced as requested above.
- b. Legible copies of all deposit slips or any other document or writing evidencing the source of funds deposited to each account for which statements are produced as requested above.
- c. Legible copies of all ledgers, reconciliation reports, registers, or other type of list used for tracking the balance of each account for which statements are produced as requested above.
- d. Legible copies of all signature cards for each account for which statements are produced as requested above.
- e. Legible copies of all communications sent to or received from each of the financial institutions for which statements are produced as requested above.
- f. Legible copies of any communications with any individual concerning any of the accounts at any of the financial institutions for which statements are produced as requested above.

REQUEST NO. 3: Legible copies of all statements or billings received from each and every creditor of debts incurred or paid during the discovery period, including but not limited to, copies of all vendor invoices or statements and other paid bill files.

REQUEST NO. 4: Legible copies of any documents, writings, or communications related to any retirement, pension, profit sharing, annuity, stock purchase, or other such similar plans.

REQUEST NO. 5: Legible copies of all mortgages, promissory notes, or other types of indebtedness representing monies owed.

REQUEST NO. 6: Legible copies of all loan applications.

REQUEST NO. 7: Legible copies of any contracts or agreements, whether proposed or actually consummated.

REQUEST NO. 8: Legible copies of all statements, contracts, and correspondence from any insurance company for any type of insurance for which you paid premium, for which premium was paid on your behalf by any other person or entity, for which you may have had coverage, or from which you received a benefit during the discovery period.

REQUEST NO. 9: Legible copies of any writings or other documents which evidence or describe your treatment of, deductions from cash value of, and disposition of any proceeds from any insurance policies for which documents are produced pursuant to the above request.

REQUEST NO. 10: Legible copies of any documents or writings evidencing any real estate acquired or disposed of during the discovery period.

REQUEST NO. 11: Legible copies of all registration, title of ownership, tax assessments, or other documents or writings evidencing each purchase, sale, use, or ownership of all vehicles, snowmobiles, trailers, motorcycles, boats, watercraft, trucks, campers, off-highway vehicles, and any other similar type of asset during the discovery period.

REQUEST NO. 12: Legible copies of all documents or writings evidencing, explaining, or detailing any pending lawsuits or any other contingent item from which a benefit may arise in the future or a liability may be incurred.

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REQUEST NO. 13: Legible copies of all documents or writings evidencing, explaining, or detailing any related-party transactions or affiliations, including, but not limited to leases, rentals, sales transactions, purchase transactions, loans, and any other such similar type of transaction.

REQUEST NO. 14: Legible copies of all documents or writings evidencing, explaining, or detailing any inquiries, offers made, or offers received for purchase or sale of any stock, real estate, personal property, or business interest.

REQUEST NO. 15: Legible copies of all stockholder lists or ledger outlining the name, address, phone number, and number of shares held for each stockholder.

REQUEST NO. 16: Legible copies of any business agreements, corporate documents, organizational documents, articles of incorporation, by-laws, minutes, joint venture agreements, operating agreements, partnership agreements, limited liability company agreements, documents amending any such documents, or other such similar documents or writings pertaining to any type of organization.

REQUEST NO. 17: Legible copies of all documents or writings evidencing any receivables at any point in time.

REQUEST NO. 18: Legible copies of all documents or writings evidencing any payables at any point in time.

REQUEST NO. 19: *The response to this request is dependent upon the computer program, if any, utilized by the company.* Copies of the data files and access to the companies computer systems for all computer programs utilized in the management and recordkeeping of the company, including but not limited to:

- a. QuickBooks data files
- b. Microsoft Money data files
- c. Peachtree Accounting data files
- d. MAS90 data files
- e. Quicken data files
- f. Usernames and passwords for the administrative account for all data files
- g. Name and version of program for which data file operates

REQUEST NO. 20: Legible copies of all financial budgets or projections for the Company prepared or started during the discovery period.

REQUEST NO. 21: Legible copies of or access to cash receipt registers/ledgers and cash disbursement registers/ledgers for the Company for all periods during the discovery period.

REQUEST NO. 22: Any list, document, writing, or schedule that shows, reflects, or establishes an equipment and depreciation schedule for the Company, which ties to the year end balance sheets for the discovery period.

REQUEST NO. 23: Any list, document, writing, or schedule that shows, reflects, or establishes all assets, property, and equipment that is used by the Company, including but not limited to:

- a. Description
- b. Date acquired
- c. Original purchase price
- d. Acquisition type (lease or purchase)
- e. Acquisition amount
- f. Useful life information
- g. Date replacement anticipated
- h. Estimate of current value
- i. Depreciation schedule

REQUEST NO. 24: Copies of any recent property tax assessments or other appraisals for any of the above items if such exist

REQUEST NO. 25: Any list, document, writing, or schedule that shows, reflects, or establishes all prepaid expenses for the Company.

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REQUEST NO. 26: Copies of all existing agreements and contracts including, but not limited to: Covenants not to compete; Supplier agreements; Equipment leases; Rental contracts; Loan agreements; Labor contracts; and so on for the Company.