

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
Miami Division

CASE NO.: 06-21748-CIV-MARTINEZ-BANDSTRA

MARK J. GAINOR,

Plaintiff,

v.

SIDLEY, AUSTIN, BROWN & WOOD, LLP,

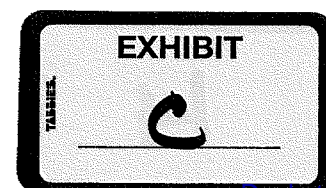
Defendant.

**PLAINTIFF'S SIXTH REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT**

Plaintiff, Mark J. Gainor, by and through his undersigned counsel and pursuant to Fed. R. Civ. P. 34, requests that Defendant, Sidley, Austin, Brown & Wood, produce for inspection and copying at the offices of Richard Benjamin Wilkes, Attorneys at Law, 600 South Magnolia Avenue, Suite 200, Tampa, Florida, within thirty (30) days, or at such other time and place as may be agreed upon between counsel, the originals, or if the originals are unavailable, copies of all documents hereinafter described.

I. DEFINITIONS AND INSTRUCTIONS

a. As used herein, "Sidley," "you" or "your," shall mean Defendant, Sidley, Austin, Brown & Wood, its affiliates, corporations, partners, predecessors, agents, servants, employees, attorneys, expert witnesses, accountants, auditors, and all persons over whom Sidley has control or who have been hired, retained or employed for any purpose by Sidley whether directly by Sidley or through any other person or entity.



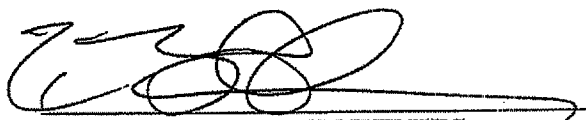
b. As used herein, the term "document" or "documents" shall be defined to include any and all documents, memoranda (including written memoranda of telephone conversations, oral communications, discussions, agreements, acts or activities), letters, postcards, telegrams, messages (including telephone messages), facsimiles, intra- and interoffice communications, correspondence, handwritten and/or typewritten notes, pamphlets, diaries, records of any kind, sound recordings, contracts, agreements, books, letters, reports, catalogues, financial statements, receipts, invoices, billing statements (including credit card and telephone statements), purchase orders, proposals, affidavits, advertisements, solicitations, indices, data processing cards, other data processing materials, data, maps, directives, desk pads, calendars, scrap books, notebooks, drawings, diagrams, sketches, statistical records, appointment books, diaries, computer printouts, data processing input and output, computer input and output, e-mail, microfilms, other records kept by electronic, photographic or mechanical means, and writing of every kind and character, including preliminary drafts and other copies of the foregoing, however produced or reproduced. If multiple copies of a document exist, each copy which is any way not completely identical to a copy which is being produced, should also be produced.

II. DOCUMENTS TO BE PRODUCED

1. All documents pertaining to R.J. Ruble's status as a practitioner before the Internal Revenue Service, including documents reflecting his ability to practice before the Internal Revenue Service and any change in that status.

2. All transcripts of any sworn testimony given by a corporate representative of Sidley Austin in connection with any claims against Sidley Austin arising out of R.J. Ruble's issuance of tax shelter opinion letters.

3. All transcripts of any sworn testimony given by R.J. Ruble in connection with any claims against Sidley Austin arising out of R.J. Ruble's issuance of tax shelter opinion letters.



RICHARD BENJAMIN WILKES

Florida Bar No. 267163

RICHARD BENJAMIN WILKES

ATTORNEYS AT LAW

600 South Magnolia Avenue, Suite 200

Tampa, Florida 33606

Telephone: (813) 254-6060

Facsimile: (813) 254-6088

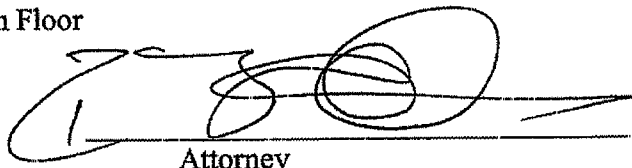
Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished by first class U.S. Mail this 16th day of January, 2007, to:

Katherine W. Ezell, Esq.
Podhurst Orseck, P.A.
25 W. Flagler Street, Suite 800
Miami, FL 33130

Jonathan E. Altman, Esq.
Aaron May, Esq.
Munger, Tolles & Olson LLP
355 South Grand Avenue, 35th Floor
Los Angeles, CA 90071



Attorney