

**EXHIBIT B**

TF

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONALD JONES, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 WACKENHUT % GOOGLE INC., )  
 )  
 Defendant. )

Case No: 1:07-CV-0567-CC-RGV

**DEFENDANT’S FIRST REQUEST FOR PRODUCTION  
OF DOCUMENTS TO PLAINTIFF**

COMES NOW Defendant The Wackenhut Corporation (“Wackenhut” or Defendant”), pursuant to Rule 34 of the Federal Rules of Civil Procedure, and requests that Plaintiff Donald Jones (“Plaintiff”) respond to this First Request For Production of Documents and produce all documents that are responsive to this Request. Your written responses and documents are due within thirty-three (33) days and should be sent to Wackenhut’s attorneys at the address listed below. Please note that, pursuant to the Federal Rules of Civil Procedure, you are under a continuing duty to supplement your responses.

**DOCUMENTS TO BE PRODUCED**

1.

Produce all documents which support your lawsuit against Wackenhut.

2.

Produce all documents and letters that you received from or sent to Wackenhut during your former employment.

3.

Produce all witness statements that you have obtained in this case.

4.

Produce your federal and state income tax returns from 2005 to the present.

5.

Produce all documents and exhibits that you will use at trial.

6.

Produce copies of applications and resumes that you have submitted to any prospective employers since June 1, 2006.

7.

Produce all medical records that you received from or sent to any medical doctors whom you have seen as a result of Wackenhut's actions. In addition, please execute the "Patient Authorization for Use/Disclosure of Health Care

Information” (attached hereto as Exhibit A) and return the Authorization to the undersigned counsel for Wackenhut.

8.

If you are seeking emotional distress damages, please produce all medical records related to any treatment by any physician, psychiatrist or psychologist whom you have seen within the last ten (10) years.

9.

Produce all documents related to any internal complaints you made or filed with Wackenhut during your former employment.

10.

Produce all documents which you sent to or received from the EEOC in this case.

11.

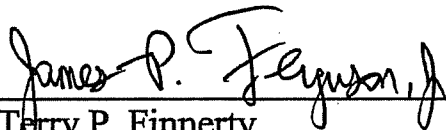
Produce all documents identified in your Initial Disclosures.

12.

Produce all documents related to all lawsuits in which you have been involved within the last ten (10) years, including civil lawsuits, criminal actions, divorce proceedings, bankruptcy proceedings, or administrative proceedings.

This 16th day of July, 2007.

DUANE MORRIS LLP

A handwritten signature in black ink that reads "James P. Finnerty". The signature is written in a cursive style and is positioned above a horizontal line.

Terry P. Finnerty

Georgia Bar No. 261561

James P. Ferguson, Jr.

Georgia Bar No. 258743

1180 West Peachtree Street  
Suite 700  
Atlanta, Georgia 30309  
(404) 253-6900 (telephone)  
(404) 253-6901 (facsimile)

Counsel for Defendant  
The Wackenhut Corporation

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION

DONALD JONES, )  
 )  
 Plaintiff, )  
 )  
 v. )  
 )  
 WACKENHUT % GOOGLE INC., )  
 )  
 Defendant. )

Case No: 1:07-CV-0567-CC-RGV

**CERTIFICATE OF SERVICE**

I hereby certify that on July 16, 2007, a true and exact copy of the foregoing **DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF** was served upon Plaintiff via U.S. mail and addressed as follows:

Donald Jones  
P. O. Box 261  
Red Oak, Georgia 30272

s/ James P. Ferguson, Jr.  
James P. Ferguson, Jr.  
Georgia Bar No. 258743

DUANE MORRIS LLP  
1180 West Peachtree Street, Suite 700  
Atlanta, Georgia 30309  
(404) 253-6900 (telephone)  
(404) 253-6901 (facsimile)

Counsel for Defendant  
The Wackenhut Corporation