Doc. 32 Att.

EXHIBIT "A"

IN THE UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF ILLINOIS

)
)
)
)
) Case No. 3:08-cv-00125-WDS-DGW
)
) Honorable Judge Stiehl
)
)
)
)

PLAINTIFF'S SUPPLEMENTAL REQUESTS FOR PRODUCTION TO DEFENDANT

NOW COMES the Plaintiff, DEPOSITORS INSURANCE COMPANY as subrogee of MICHAEL AND MELISSA UNGER, by and through its attorneys, SNECKENBERG, THOMPSON & BRODY, LLP, and propounds the following Supplemental Requests for Production of Documents and Inspection to the Defendant, HAMILTON BEACH/PROCTOR-SILEX, INC., to be produced within thirty (30) days at the office of SNECKENBERG, THOMPSON & BRODY, pursuant to Federal Rule of Civil Procedure 34:

DEFINITIONS

(a). "Document(s)" or "documentation" is used herein in its broadest sense to encompass the full breadth of meaning permitted by Federal Rule of Civil Procedure 26(b) and 34(a), and includes without limitation, all writings, papers, tangible things in your possession or subject to your control, including any financial statements, books, records, ledgers, minutes of meetings, handwritten notes, calendar pads, appointment books, diary entries, note pads, notebooks, correspondence of any kind, e-mails, memoranda, telegrams, annual or other reports, contracts, agreements, drafts, appraisals, analyses, charts, graphs, bulletins, speeches, data sheets, data tapes or readable computer-produced interpretations thereof, circulars, pamphlets, maps, notices,

stenographic notes, surveys, microfilm, microfiche, tape and disc recordings, Photostats, photographs, transparencies, overlays, periodicals, sketches, drawings, illustrations, blueprints, plans press releases, invoices, purchase orders, and personal interviews, or other items or from which information, communications or data may be perceived or obtained, wherever located, including all non-identical copies of any of the above.

- (b). "Occurrence" means the subject fire described in the Complaint.
- (c). "Relating to" or "referring to" means anything which, directly or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any way, is or was used in the preparation of, is appended to, or is legally, logically, or factually connected with the subject specified.
- Please produce a CD or a printed copy of the Circuit Diagrams/Schematic Diagrams of the Printed Circuit Boards for the Hamilton Beach Toaster Model No. 22625 the Hamilton Beach Toaster Model No. 24203.
- Please produce a CD or a printed copy of the Circuit Diagrams/Schematic Diagrams of the Printed Circuit Board for our subject Toastermaster Toaster Oven Model No. 22708, including the Schematic Diagrams or both of the Printed Circuit Boards on this model.

Respectfully submitted,

Stuart M. Brody

Sneckenberg, Thompson, & Brody, LLP

161 N. Clark Street

Suite 3575

Chicago, IL 60601

Phone No. (312) 782-9320

E-Mail: smb@stbtrial.com

Attorneys for the Plaintiff, Depositors Insurance Company

a/s/o Michael and Melissa Unger

PROOF OF SERVICE

I hereby certify that on August <u>27</u>, 2008, a copy of the attached document was mailed, First Class, postage prepaid, to the following:

William S. Thomas (#6227180) Nicholas B. Bunnell (#6291433) RABBITT, PITZER & SNODGRASS, P.C. 100 South Fourth Street, Suite 400 St. Louis, Missouri 63102-1821 Phone No. (314) 421-5545 Fax No. (314) 421-3144

Matthew C. Zittel
NEVILLE, RICHARDS & WULLER, LLC
5 Park Place Professional Centre
Belleville, IL 62226-0070
(618) 277-0900; Fax: (618) 277-0970
mzittel@nrw-law.com

/s/ Stuart M. Brody
Stuart M. Brody

Stuart M. Brody