

SULLIVAN, WARD, ASHER & PATTON, P.C.

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February 20, 2006

India Minchoff
Russo & Minchoff
123 Boston Street
Boston, MA 02125**RE: HOFER, STEPHANIE/DOUGLAS V. THE GAP, INC., ET AL
OUR FILE NO. PAG-121179**

Dear Ms. Minchoff:

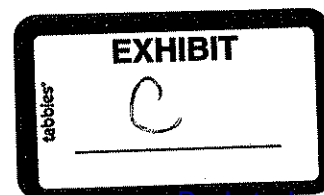
This will acknowledge receipt of Plaintiff's Rule 26 Disclosure that we retrieved from the Pacer system on February 15. I always prefer to attempt to obtain information informally before we file formal requests. I certainly will be more than willing to do so, but I believe that under the Federal Rules, you were required to produce this information as matter of course. Thus, I would request complete copies of the following materials:

Section (B)(1), Medical records (By Category): Please provide full and complete records for each of the physicians and health care institutions numbered 1 through 12 in the Plaintiff's Rule 26 Disclosure dated February 15, 2006.

Photographs that are identified in (B)(3), which include photographs identified as 1, 2 and 3. We would ask that those photographs be placed on a CD and that a CD be produced. Our office will be responsible for any copying costs in this regard.

Copies of documents in (B)(4), including the name and address of Plaintiff's employer.

Copies of documents in (B)(6), which are identified as "3 Pairs of Identical Old Navy Sandals." We would ask that one pair of the sandals be Fed Ex'd to our office for review and production. We would also ask for you to identify where the sandals were purchased, when the sandals were purchased and produce any and all sales receipts for said sandals. Additionally, we would ask for photographs of the sandals, again having the same placed on CD including any labeling of said sandals.



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With respect to Section (C), DAMAGE CALCULATION, please provide any and all documents that support the claims contained in paragraphs 2(C) and (D).

With respect to Section (C)(3), please produce all of the documents that support the statements in 3A and 3B, including any and all applications for disability insurance, social security disability payments or any other applications which would in any way evidence the claimed disability status.

Finally, I would like you to provide us with dates so that we could coordinate the taking of the depositions of the individuals identified in paragraph (A), including Stephanie Hofer, Douglas Hofer, Lauren Pompei, Carrie LeBlanc and Henry McKenzie. With respect to Mr. McKenzie, please identify the telephone number and current address of Mr. McKenzie.

I do thank you for your anticipated cooperation in this regard. Again, I would be more than willing to place this in a formal discovery request should you wish. I look forward to your response.

Very truly yours,

SULLIVAN, WARD,
ASHER & PATTON, P.C.


Scott D. Feringa

SDF/df

W0443010.7

cc: Sean J. Milano, Esq.
Thomas T. Reith, Esq.

bcc: Fiona Williams
Chantell Stephen (Claim No. 683-084184)

W0443010.6

