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 6 *Attorneys for Plaintiff*  
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 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10 1ST TECHNOLOGY LLC,  
 11 Plaintiff,

12 vs.

13 RATIONAL ENTERPRISES LTDA.,  
 14 RATIONAL POKER SCHOOL  
 LIMITED, BODOG ENTERTAINMENT  
 15 GROUP S.A., BODOG NET,  
 BODOG.COM, and FUTUREBET  
 16 SYSTEMS LTD.,  
 17 Defendants.

2:06-cv-01110-RLH-GWF

**NOTICE OF EXAMINATION OF  
 JUDGMENT DEBTORS AND REQUEST  
 TO PRODUCE DOCUMENTS AT THAT  
 TIME**

18 TO: BODOG ENTERTAINMENT GROUP S.A., BODOG NET, BODOG.COM,  
 defendants/judgment debtors;

19 TO: Calvin Ayre, owner and CEO of defendants/judgment debtors.

20 PLEASE TAKE NOTICE that on October 4, 2007, at the hour of 10:00 a.m., Calvin  
 21 Ayre, owner and CEO of BODOG ENTERTAINMENT GROUP S.A., BODOG NET,  
 22 BODOG.COM, (judgment debtors) has been ordered to appear at the law offices of  
 23 HUTCHISON & STEFFEN, LLC, Peccole Professional Park, 10080 West Alta Drive, Suite  
 24 200, Las Vegas, NV 89145, on October 4, 2007 at 10:00 a.m., to be sworn under oath or  
 25 affirmation. A copy of the order is attached hereto as Exhibit 1. Thereupon, Calvin Ayre will  
 26 be examined by plaintiff's counsel, L. Kristopher Rath and/or others, regarding Mr. Ayre's  
 27 property and assets in connection with a judgment obtained by plaintiff on June 13, 2007, and  
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1 must produce at that time the following documents.

2 As used herein, the term "person" or its plural or any synonym thereof, is intended to  
3 and shall embrace and include any natural person, firm, joint venture, estate, trust, receiver,  
4 syndicate, or any other group or combination acting as a unit or acting as a form of legal entity,  
5 partnership, corporation, company, association, government agency (whether federal, state,  
6 local or any agency or the government of a foreign country or any other entity).

7 As used herein, the term "communication," its plural or any synonym thereof, is  
8 intended to and shall embrace and include all written communications, and with respect to all  
9 communications, shall include but is not limited to every discussion, conversation, conference,  
10 meeting, interview, telephone call or other professional service visit.

11 The terms "and" or "or" shall be construed disjunctively or conjunctively as necessary,  
12 in order to bring within the scope of a request for production of documents all responses which  
13 might otherwise be construed to be outside of its scope.

14 As used herein, the term "identify" when used with reference to a document means to  
15 state (i) the date that such document bears, or if not dated, the date that it was prepared, (ii) the  
16 identity of the person who prepared such document, (iii) the present location and identity of the  
17 custodian of the original of such document and all known copies thereof, (iv) the type of  
18 document or means to identify the document with sufficient particularity to meet the  
19 requirements for inclusion in a request for production of documents ; (v) the title of such  
20 document; and (vi) a summary of the contents of the document.

21 If you are unable to locate any document called for in this request after conducting a  
22 reasonable investigation, so state and (i) identify the specific documents which you could not  
23 obtain; (ii) your efforts to obtain such document; and (iii) the person or persons who are likely  
24 to have custody of the document.

25 If any document is withheld based on a claim of privilege, so state and identify the  
26 documents for which there is a claim of privilege as follows:

27 (i) the date it bears;

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- 1 (ii) the name of each person who prepared it or participated in any way in its
- 2 preparation;
- 3 (iii) the name of each person who signed it;
- 4 (iv) the name of each person to whom it or a copy of it was addressed;
- 5 (v) the name of each person who presently has custody of it or a copy of it;
- 6 (vi) its subject matter and its substance; and
- 7 (vii) what basis there is for the claim of privilege.

8 **DOCUMENTS TO BE PRODUCED**

- 9 1. All bank records of judgment debtors from 2003 through the present, including
- 10 but not limited to original bank statements and canceled checks for each account
- 11 maintained or utilized by them.
- 12 2. All records relating to receipts, disbursements, assets, and liabilities of judgment
- 13 debtors from 2003 through the present, including but not limited to check
- 14 registers, bank journals, general ledgers, income and expense reports, and
- 15 balance sheets.
- 16 3. Judgment debtors' income tax returns for the last five years 2003, 2004, 2005,
- 17 2006, and 2007.
- 18 4. Judgment debtors' customer lists for the last five years 2003, 2004, 2005, 2006,
- 19 and 2007.
- 20 5. Judgment debtors' list of affiliates and copies of all contracts of affiliates for the
- 21 last five years 2003, 2004, 2005, 2006, and 2007.
- 22 6. Judgment debtor's sponsorship agreements for the last five years 2003, 2004,
- 23 2005, 2006, and 2007.
- 24 7. All bank records reflecting transactions with all affiliates, transactions with
- 25 customers, and all transactions with all individuals and entities Judgment
- 26 debtor's have sponsored.

27 The documents are requested to be produced by September 25, 2007. Any  
28 documentation meeting the foregoing description which has previously been produced is not

1 required to be produced at this time.

2 The examination of Calvin Ayre, owner and CEO of the judgment debtors is requested  
3 for October 4, 2007, at 10:00 a.m. at the law offices of HUTCHISON & STEFFEN, LLC,  
4 Peccole Professional Park, 10080 West Alta Drive, Suite 200, Las Vegas, NV 89145, on  
5 October 4, 2007 at 10:00 a.m.

6 This Examination is made to permit plaintiff to examine the acts, conduct, and property  
7 of BODOG ENTERTAINMENT GROUP S.A., BODOG NET, BODOG.COM, which affects  
8 the collection efforts of plaintiff regarding the outstanding debt owed to plaintiff.

9 DATED this 7th day of September, 2007.

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HUTCHISON & STEFFEN, LLC.



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