

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

REED, et al.,)	
)	CASE NO. 1:08CV1761
Plaintiffs,)	
)	JUDGE CHRISTOPHER A. BOYKO
vs.)	
)	
FREEBIRD FILM PRODUCTIONS, INC., et al.,)	
)	
Defendants.)	

**PLAINTIFFS' RESPONSES TO
DEFENDANTS FREEBIRD FILM PRODUCTIONS, INC., FLY ON, INC., VECTOR
MANAGEMENT, INC., GARY ROSSINGTON, ROSS SCHILLING, AND LYNYRD
SKYNYRD PRODUCTIONS, INC.'S SECOND SET OF INTERROGATORIES,
REQUESTS FOR PRODUCTION OF DOCUMENTS, AND REQUESTS FOR
ADMISSIONS TO PLAINTIFFS CRAIG REED AND SURVIVOR FILMS, INC.**

Plaintiffs Craig Reed and Survivor Films, Inc., by and through their undersigned counsel, and in accordance with Rules 26, 33, 34, and 36 of the Federal Rules of Civil Procedure and Rule 26.1 of the Local Rules of the United States District Court for the Northern District of Ohio, hereby provide the following responses and objections to the Second Set of Interrogatories, Requests for Production of Documents, and Requests for Admissions propounded by Defendants Freebird Film Productions, Inc., Fly On, Inc., Vector Management, Inc., Gary Rossington, Ross Schilling, and Lynyrd Skynyrd Productions, Inc. (collectively, "the Lynyrd Skynyrd Defendants").

I. SECOND SET OF INTERROGATORIES

1. Identify any communication Reed made to any Person affiliated with the Lynyrd Skynyrd organization demanding that the Lynyrd Skynyrd organization stop showing portions of

the Film at Lynyrd Skynyrd live performances, the Person to whom such communication was made, the date of such communication, and if there were no such communications please state that.

ANSWER: Objection. The foregoing Interrogatory is vague and ambiguous in its use of the terms/phrases “any Person affiliated with the Lynyrd Skynyrd organization” and “demanding.” Without waiving the foregoing objection, and as Plaintiffs understand and construe the foregoing Interrogatory, Plaintiffs will produce copies of the correspondence from its attorneys in 2008 setting forth such demands to Don Lester and Jonathon Blaufarb. Additionally, Plaintiffs identify the following telephone conversations wherein Plaintiffs expressed their displeasure regarding the use and/or payment for the use of the Film during live concerts:

Ross Shilling (August 2003)

Johnny Van Zandt (August 2003)

Gary Rossington (August 2003)

Finally, Plaintiffs identify email communications (copies being produced) they had with Country Music Television in May 2005 about not using the Film.

II. REQUESTS FOR PRODUCTION OF DOCUMENTS

1. All documents identified in response to or whose identification was requested in the above-identified Interrogatories.

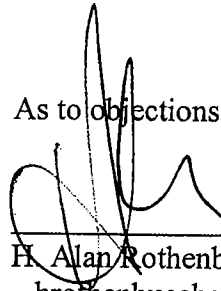
ANSWER: Objection. Plaintiffs object to this document request to the extent it seeks production of privileged information or documents. Without waiving the foregoing objection, Plaintiffs will produce all non-privileged documents in their possession, custody, and control that are responsive to the foregoing request, to the extent such documents exist.

III. REQUESTS FOR ADMISSIONS

1. Admit that, upon the cessation of Reed's employment with the Lynyrd Skynyrd organization in or around 2005, Reed never notified any Person affiliated with the Lynyrd Skynyrd organization that Reed wanted the Lynyrd Skynyrd organization to stop showing portions of the Film at Lynyrd Skynyrd live performances.

ANSWER: Denied.

As to objections,



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*Attorneys for Plaintiffs Craig Reed and
Survivor Films, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that a true and accurate copy of the foregoing PLAINTIFFS' RESPONSES TO DEFENDANTS FREEBIRD FILM PRODUCTIONS, INC., FLY ON, INC., VECTOR MANAGEMENT, INC., GARY ROSSINGTON, ROSS SCHILLING, AND LYNYRD SKYNYRD PRODUCTIONS, INC.'S SECOND SET OF INTERROGATORIES, REQUESTS FOR PRODUCTION OF DOCUMENTS, AND REQUESTS FOR ADMISSIONS were served this 3rd day of November 2008, via ordinary U.S. Mail, upon the following:

Mark E. Avsec, Esq.
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*Attorneys for Defendants
Freebird Film Productions, Inc., Fly On, Inc.
Vector Management, Inc., Gary Rossington, Ross
Schilling, and Lynyrd Skynyrd Productions, Inc.*

-and-

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Lions Gate Entertainment, Inc.*



H. Alan Rothenbuecher

