

EXHIBIT G

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

ARTHUR ALAN WOLK, ESQUIRE :

Plaintiff : **NO. 09-CV-04001-MAM**

vs.

: **JURY TRIAL DEMANDED**

WALTER K. OLSON, ESQUIRE
THEODORE H. FRANK, ESQUIRE :
DAVID M. NIEPORENT, ESQUIRE :
THE OVERLAWYERED GROUP :
And OVERLAWYERED.COM

:

Defendants

**PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS
TO ALL DEFENDANTS**

Plaintiff, Arthur Alan Wolk, Esquire, by and through his counsel, Spector, Gadon & Rosen, P.C., hereby requests that Defendants, Walter K. Olson, Esquire, Theodore H. Frank, Esquire, David M. Nieporent, Esquire, the Overlawyered Group, and Overlawyered.com, respond to the following Request for Production of Documents, Set No. One ("Requests") and produce the responsive documents, in conformity with the Federal Rules of Civil Procedure.

INSTRUCTIONS AND DEFINITIONS

The following definitions and instructions apply throughout this request, and are deemed incorporated herein as though set forth in full.

Instructions

1. These document requests shall be deemed continuing and shall require supplemental answers if additional documents are acquired after the date of deposition, as soon as practicable but in any event not later than thirty (30) days from the date of discovery.

2. With respect to any document the deponent deems privileged, provide a statement setting forth as to each document:

- (a) the date appearing on the document, or if no date appears, the date on which the document was prepared;
- (b) the name of each person to whom the document was addressed;
- (c) the name of each person to whom the document, or a copy thereof, was sent, or with whom the document was discussed;
- (d) the name of each person who signed the documents, or if not signed, the name of each person who prepared it;
- (e) the name of each person making any contribution to the authorship of the document;
- (f) the employer and job title of each person identified in (b), (c), (d) or (e) above;
- (g) the date the document was received or discussed by each of the persons identified in (b) or (c) above;
- (h) the general nature of description of the document, or part claimed to be privileged, and the number of pages of which it consists;
- (i) the name of each person who has custody of the document;
- (j) the specific ground(s) on which the claim of privilege rests.

3. In producing documents, you are requested to produce the original of each document together with all non-identical copies and drafts of that document. If the original of any document cannot be located, a copy shall be provided in lieu thereof, and shall be legible and bound or stapled in the same manner as the original.

4. Documents shall be produced as they are kept in the usual course of business. All documents shall be produced in the file folder, envelope or other container in which the documents are kept or maintained. All documents shall be produced intact in their original files, without disturbing the organization of documents employed during the conduct of the ordinary course of business, and during the subsequent maintenance of the documents.

5. All documents shall be produced which respond to any part or clause of any paragraph of a request. Each document requested shall be produced in its entirety and without deletion or excisions, regardless of whether you consider the entire document to be relevant or responsive. If you have redacted any portion of a document, stamp or write or otherwise affix the word "REDACTED" on each page of the document which you have redacted, and provide a separate statement explaining the basis for each redaction.

DEFINITIONS

As used herein, the following terms are intended to have the meanings indicated:

1. "You" and "Your" refer to the persons upon whom this document has been served, including their agents, servants, employees, officers, directors, members, affiliates, attorneys, subsidiaries, parent companies, related entities and those persons in active concert or participation with them, all other persons acting or purporting to act on their behalf, as well as the Overlawyered Group and Overlawyered.com. "You" and "your" when used in reference to "materials" and "documents" shall include materials and documents in your possession or under your control, and materials and documents

whose present and past existence you are aware of, as well as materials and documents prepared by you unless otherwise stated.

3. "Frank Article" means the April 7, 2008 article written by Theodore H. Frank, Esquire entitled Arthur Alan Wolk v. Teledyne Industries, Inc.

5. "Writings" or "Document" are used herein in the broadest sense, and mean all written or printed matter of any kind, including the originals and all non-identical copies, including drafts, whether different from the originals by reason of any notation made on such copies or otherwise, including without limitation correspondence, electronic mail messages, memoranda, reports, notes, diaries, statistics, letters, telegraphs, minutes, agendas, contracts, reports, studies, checks, statements, receipts, returns, financial sheets, schedules, invoices, drafts, projections, summaries, pamphlets, books, prospectuses, inter-office and intra-office communications, offers, notations of any sort of conversations, bulletins, computer printouts, teletypes, telefaxes, invoices, worksheets and all drafts, alterations, modifications, changes and amendments of any of the foregoing, graphic or manual records or representations of any kind including without limitation photographs, charts, graphs, microfiche, microfilm, videotapes, audiotapes, records, motion pictures, and electronic, mechanical, computer or electric records or representations of any kind, including without limitation, tapes, cassettes and all recordings, computer discs, both hard and floppy, CD's, and CD-ROMs and computer hard, JAZ and ZIP drives. Two or more copies of a document bearing divergent or different notations, handwritten or typewritten, shall be treated as separate documents for this purpose, as well as all drafts of documents. All attachments or documents referred to by documents responsive to any request shall be produced.

7. As used herein, the term “Person” or “persons” mean any individual, corporation, partnership, joint venture, firm, association, organization, society, proprietorship, agency, board, authority, commission or other entity.

8. “Communicate” or “communication” mean every manner or means of disclosure, transfer, or exchange, and every disclosure, transfer, or exchange of information whether orally or by document or whether face-to-face, by telephone, mail, electronic mail, personal delivery or otherwise.

9. The phrase “referring or relating to”, or any variant thereof, means in any way, directly or indirectly, showing, disclosing, adverting to, embodying, reflecting, evidencing, constituting, mentioning, or revealing, either in whole or in part.

10. The singular includes the plural and vice versa. The masculine includes the feminine and neuter genders. The term “between” means “among” and vice versa. The past tense includes the present tense, and vice versa, when the clear meaning is not distorted by changing of tense.

11. The phrase “and” and “or” shall mean “and/or”, “any” shall include “all” and “every” and vice versa.

REQUESTS FOR PRODUCTION

1. All documents and communications, including but not limited to searches on the internet, that You initiated to any third party, or that You reviewed or relied upon in drafting, editing and disseminating the April 7, 2008 Frank Article.

2. All documents and communications, including but not limited to searches on the internet, that evidence, refer to or relate to any investigation performed by You, or that you initiated to any third party, with respect to the subjects covered in the April 7,

2008 Frank Article, in drafting, editing and disseminating the April 7, 2008 Frank Article, including but not limited to notes and drafts.

3. All documents and communications that evidence, refer to or relate to the Frank Article, including, but not limited to statistics, input and/or information relating to or from any person(s) who accessed the Frank Article.

4. All communications with any server, browser or search facility that would connect to a dissemination of the article on the Internet or to Wolk.

SPECTOR GADON & ROSEN, P.C.



Paul R. Rosen, Esquire
Andrew J. DeFalco, Esquire
SPECTOR GADON & ROSEN, P.C.
1635 Market Street, 7th Floor
Philadelphia, Pennsylvania 19103
(215) 241-8888 (Main)
(215) 241-8844 (Fax)

Counsel for Plaintiff

Dated: September 2, 2009

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

ARTHUR ALAN WOLK, ESQUIRE :

Plaintiff : NO. 09-CV-04001-MAM

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THEODORE H. FRANK, ESQUIRE :
DAVID M. NIEPORENT, ESQUIRE :
THE OVERLAWYERED GROUP :
And OVERLAWYERED.COM :

Defendants

NOTICE OF DEPOSITION OF DAVID NIEPORENT, ESQUIRE

TO: Michael A. Onufrak, Esquire
Siobahn K. Cole, Esquire
WHITE and WILLIAMS LLP
1800 One Liberty Place, 1650 Market Street
Philadelphia, PA 19103

PLEASE TAKE NOTICE that counsel for plaintiff, Arthur Alan Wolk, Esquire, will take the deposition of **David M. Nieporent, Esquire**, pursuant to Rule 30 of the Federal Rules of Civil Procedure, at the offices of Spector Gadon & Rosen, P.C., 1635 Market Street, 7th Floor, Philadelphia, PA 19103, by oral examination and before an officer duly qualified to administer oaths, on October 7, 2009 at 10:00 a.m., and continuing from day to day until concluded.



Paul R. Rosen, Esquire
Andrew J. DeFalco, Esquire
SPECTOR GADON & ROSEN, P.C.
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Counsel for Plaintiff

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And OVERLAWYERED.COM :

Defendants

NOTICE OF DEPOSITION OF WALTER K. OLSON, ESQUIRE

TO: Michael A. Onufrak, Esquire
Siobahn K. Cole, Esquire
WHITE and WILLIAMS LLP
1800 One Liberty Place, 1650 Market Street
Philadelphia, PA 19103

PLEASE TAKE NOTICE that counsel for plaintiff, Arthur Alan Wolk, Esquire, will take the deposition of **Walter K. Olson, Esquire**, pursuant to Rule 30 of the Federal Rules of Civil Procedure, at the offices of Spector Gadon & Rosen, P.C., 1635 Market Street, 7th Floor, Philadelphia, PA 19103, by oral examination and before an officer duly qualified to administer oaths, on October 6, 2009, at 10:00 a.m., and continuing from day to day until concluded.



Paul R. Rosen, Esquire
Andrew J. DeFalco, Esquire
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1635 Market Street, 7th Floor
Philadelphia, Pennsylvania 19103
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Counsel for Plaintiff

Dated: September 2, 2009

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TO: Michael A. Onufrak, Esquire
Siobahn K. Cole, Esquire
WHITE and WILLIAMS LLP
1800 One Liberty Place, 1650 Market Street
Philadelphia, PA 19103

PLEASE TAKE NOTICE that counsel for plaintiff, Arthur Alan Wolk, Esquire, will take the deposition of **Theodore H. Frank, Esquire**, pursuant to Rule 30 of the Federal Rules of Civil Procedure, at the offices of Spector Gadon & Rosen, P.C., 1635 Market Street, 7th Floor, Philadelphia, PA 19103, by oral examination and before an officer duly qualified to administer oaths, on October 5, 2009, at 10:00 a.m., and continuing from day to day until concluded.



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Counsel for Plaintiff

Dated: September 2, 2009