

IV. PLAINTIFF REQUESTS PRODUCTION OF THE FOLLOWING: (All Defendants)

1. A complete copy of the investigative file within Defendants' possession and/or control relating to the action here-involved excluding only documents or portions of documents which you contend are protected from disclosure pursuant to the Federal Rules of Civil Procedure.

2. Each and every document whether related to the subject matter of this lawsuit or not which you sent, gave to or received from the Plaintiff during the relevant time period.

3. Each and every document during the relevant time Period in which the Plaintiff and/or Plaintiff's 26 rental properties or offices are mentioned directly or indirectly excluding only attorney/client information.

4. A copy of the business license for Cadle Company II.

5. All documents establishing and authorizing Cadle Company II to do .business within the Commonwealth of Pennsylvania

6. A written job description for Thomas Leighton as Mayor of The City of Wilkes-Barre during the relevant time period.

7. A copy of Leighton's resume.

8. A copy of all licenses, certifications or other documents which relate to Leighton's credentials as an Insurance Broker.

9. A Written job description for Michael Kermec's position with Cadle Company II during the relevant time period.

10.A copy of Kermec's resume.

11.A copy of all degrees, licenses, certifications, etc. earned by Kermec.

12.A written job description for France Kratz's position with The City of Wilkes-Barre during the relevant time period.

13.A copy of Kratz's resume.

14.A copy of all licenses, certifications or other documents which relate to Kratz's credentials and qualifications as Director of The City of Wilkes-Barre's Code Enforcement Office.

15.A written job description for Greg Barrouk's position with Mayor Leighton's office during the relevant time period.

16.A copy of Barrouk's resume.

17.A copy of all degrees, licenses, certifications, etc. earned by Barrouk.

18.All personnel policy and procedure handbooks maintained by Defendants during the relevant time period.

19.All standard operating procedures for determining inspections, citations and evacuations of properties within the City of Wilkes-Barre.

20.Any and all statements, notes, reports, tape recordings, written memorandums, etc., of witnesses presently known to you which have been taken or given in preparation of this case.

21.Copies of all documents which may be relied upon by any non-expert witness at the trial of this matter.

22.All documents, pictures, recordings, printouts, e-mails or other evidence which have been accumulated, requested or maintained by you for use in this matter whether such information will be used at the trial of this matter or meant strictly for reference purposes, excluding only attorney/client privilege and work product information.

23.Any minutes of meetings, notes, e-mails. journal, diary or calendar entries or other documentation which memorialize any meetings, conversations, phone calls or other contact between the Plaintiff and any

representative of the Defendants relating in any way:' to the subject matter of this case.

24. Any minutes of meetings, notes, e-mails, journal, diary or calendar entries or other documentation which memorialize any meetings, conversations, phone calls or other contact between any Defendants relating in any way to the subject matter of this case .

25. All documents exchanged between each and any of the Defendants which refer or relate to Plaintiff, his 26 rental properties or his offices located at 444 South Franklin Street, 442 South Franklin Street, 448 South Franklin Street and 62-64 West Ross Street.

26. Copies of Defendants' Profit and Loss Statements and/or any other related documents such as tax returns or financial statements which would indicate Defendants' Net Worth within the relevant time period.

27. The phone records of each Defendant from October 2005 to present.

28. A copy of the court hearing and testimony in front of Judge Lokuta in October 2006.

29. All inspection reports, citations or other documents regarding the inspection, citations and evacuations of Plaintiff's properties or offices from October 2005 to present.

30. All bank receipts, deposit slips, account information regarding the bank account used for depositing any monies received from Plaintiff's rental properties from October 2005 to present.

31. All orders of court relating to Plaintiff's 26 rental properties or offices within Defendants' possession and/or control.

32. Copies of inspections, citations and/or documents relating to evacuations of any other offices other than Plaintiff's which occurred on

Franklin and/or Ross Streets between the dates of February 7, 2007 and April 24,2007.

33.Copies of all appraisals conducted by any of the Defendants or on behalf of Defendants regarding Plaintiff's 26 rental properties.

34.The personnel file of Thomas Leighton. Plaintiff has attached a Confidentiality Agreement so that Defendants may release this information.

35.The personnel file of Michael Kermec. Plaintiff has attached a Confidentiality Agreement so that Defendants may release this information.

36.The personnel file of Frances Kratz" Plaintiff has attached a Confidentiality Agreement so that Defendants may release this information.

37. The personnel file of Greg Barrouk. Plaintiff has attached a Confidentiality Agreement so that Defendants may release this information.

38.Provide copies of all documents identified, referred to or relating to Defendants Cadle Company II and Michael Kermec's answer to Interrogatory Nos. 6, 10, 11, 12; 13, 14, 15, 16, 17, 18, 19,20,21,22,23,24 of Plaintiff's First Set of Interrogatories Directed to Cadle Company II and Michael Kermec.

39.Provide copies of all documents identified, referred to or relating to Defendants The City of Wilkes-Barre and Thomas Leighton's answer to Interrogatory Nos. 3, 6, 7, 8, 9, 10~ 11~ 12, 13, 14, 15, 16, 17 of Plaintiffs First Set of Interrogatories Directed to The City of Wilkes-Barre and Thomas Leighton.

40.Provide copies of all documents identified, referred to or relating to Defendants Kratz and Barrouk's answer to Interrogatory Nos. 6, 7, 8,9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19,20,21,22 of Plaintiff's First Set of Interrogatories Directed to Frances Kratz and Greg Barfouk.

41. Copies of all documents identified in Defendants' Initial Disclosures.

42. Any other information accumulated and placed in Counsel's possession by any representative of the Defendants excluding all attorney/client privileged information.

43. A copy of all reports prepared by any expert including a copy of the expert's curriculum vitae which Defendants intend to introduce as evidence at time of trial.

**NOTE:** Defendants are required to identify documents or portions of documents withheld from disclosure as required by F.R.C.P.

Further this Request for Production of Documents shall be deemed to be continuing and any information secured subsequent to the filing of answers thereto, which would have been includable in the answers had they been known or available, shall be supplied by supplemental answers or production as soon as such information becomes known or available and in all events prior to the trial of this action.