

Exhibit C List of Documents Produced
Loftus Request

26 Requests			35 Requests		
Cadle		Received	City	Received	
1.	Complete copy of investigative file.	NO	1.	Complete copy of investigative file.	NO
2.	Each and every document you sent, gave to or received from the Plaintiff during the relevant time period.	NO	2.	Each and every document you sent, gave to or received from the Plaintiff during the relevant time period.	NO
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.	NO	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.	NO
4.	A copy of the business license for Cadle Company II to do business in the Commonwealth of PA.	NO	6.	Job description for Thomas Leighton as Mayor of the City of Wilkes-Barre.	YES
5.	All documents establishing and authorizing Cadle Company II to do business within the Commonwealth of PA.	NO	7.	Leighton's resume.	NO
9.	Job description for Michael Kermec's position with the Cadle Company II during the relevant time period.	NO	8.	All licenses, certifications or other documents which relate to Leighton's credentials as an Insurance Broker.	NO
10.	Kermec's resume.	NO	12.	Job description for Frank Kratz's position with the City of Wilkes-Barre during the relevant time period.	YES
11.	All degrees, licenses, certifications, etc. earned by Kermec.	NO	13.	Kratz's resume.	NO
18.	All personnel policy and procedure handbooks maintained by Defendants during the relevant time period.	NO	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.	YES

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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.	NO	15. A written job description of Greg Barrouk's position with Mayor Leighton's office during the relevant time period.	YES
21. Copies of all documents which may be relied upon by any non-expert witness at the trial of this case.	NO	16. A copy of Barrouk's resume.	YES
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.	Yes some notes	17. A copy of all degrees, licenses, certifications, etc. earned by barrouk.	NO
23. Any minutes of meetings, notes, e-mails, journal, diary or calendar enries 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.	NO	18. All personnel policy and procedure handbooks maintained by Defendants during the relevant time period.	YES
24. Any minutes of meetings, notes, e-mails, journal, diary or calendar enries 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.	NO	19. All standard operating procedures for determining inspections, citations and evacuations of properties within the City of Wilkes-Barre.	YES

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Cadle	Received	City	Received
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.	NO	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.	NO
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.	NO	21. Copies of all documents which may be relied upon by any non-expert witness at the trial of this case.	NO
27. The phone records of each Defendant from October 2005 to present.	NO	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.	NO
28. A copy of the court hearing and testimony in front of Judge Lokuta in October 2006.	NO	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.	NO
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.	NO	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.	NO

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Cadle	Received	City	Received
31. All orders of court relating to Plaintiff's 26 rental properties or offices within Defendants' possession and/or control.	NO	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.	NO
33. All appraisals conducted by ny of the Defendants or on behalf of Defendants regarding Plaintiff's 26 rental properties.	YES	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.	NO
35. Personnel file of Michael Kermec.	NO	27. The phone records of each Defendant from October 2005 ro present.	NO
38. All documents relating to Cadle and Kermec's answers to Interrogatory Nos. 6, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24.	NO	28. A copy of the court hearing and testimony in front of Judge Lokuta in October 2006.	NO
41. All documents in Defendants' initial disclosures.	NO	29. All inspection reports, citations or other documetns regarding the inspection, citations and evacuations of Plaintiff's properties or offices from October 2005 to present.	YES
42. Other information in Counsel's possession by any Defendant excluding attorney/client privileged information.	NO	31. All orders of court relating to Plaintiff's 26 rental properties or offices within Defendants' possession and/or control.	NO
43. Reports by any expert; curriculum vitae, intended to introduce as evidence at trial.	NO	32. Copies of inspections, citations and/or documents relating to evacuations of any other offices other than Plaintiffs	NO
		33. All appraisals conducted by ny of the Defendants or on behalf of Defendants regarding Plaintiff's 26 rental properties.	YES
		34. Personnel file of Thomas Leighton	NO

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		36. Personnel file of Frank Kratz.	YES
		37. Personnel file of Greg Barrouk.	YES
		39. All documents relating to the City and Leighton's answers to Interrogatory Nos. 3, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17.	NO
		40. All documents relating to Kratz and Barrouk's answers to Interrogatory Nos. 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22.	NO
		41. All documents in Defendants' initial disclosures.	NO
		42. Other information in Counsel's possession by any Defendant excluding attorney/client privileged information.	NO
		43. Reports by any expert; curriculum vitae, intended to introduce as evidence at trial.	NO