

IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
AUSTIN DIVISION

DELIVERANCE POKER, LLC,	§	
Plaintiff ,	§	
	§	
v.	§	CIVIL ACTION NO. 1:10-CV-00664-JRN
	§	
	§	
MICHAEL MIZRACHI and	§	
TILTWARE, LLC,	§	
Defendant	§	

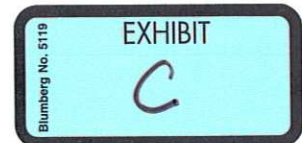
**DEFENDANT MICHAEL MIZRACHI'S RESPONSES TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

TO: Plaintiff Deliverance Poker, LLC, by and through its attorney of record, Douglas M. Becker, Gray & Becker, P.C., 900 West Avenue, Austin, Texas 78701.

Pursuant to the provisions of Rule 34 of the Federal Rules of Civil Procedure, Defendant Michael Mizrachi submits his responses to Plaintiff Deliverance Poker, LLC's First Request for Production of Documents.

Respectfully submitted,

/s/ John P. Henry
 John P. Henry
 The Law Offices of John Henry, P.C.
 407 W. Liberty St.
 Round Rock, Texas 78664
 (512) 428-5448
 (512) 428-6418 Facsimile
jhenry@jhenrylaw.com
Attorneys for Defendant
Michael Mizrachi



CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of January, 2011, I caused the foregoing document to be delivered via facsimile to the following parties, through their attorney of record:

/s/ John P. Henry
John P. Henry

Douglas M. Becker
Gray & Becker, P.C.
900 West Avenue
Austin, Texas 78701
(512) 482-0924
Attorneys for Plaintiff

RESPONSES

1. All agreements between you and any person or entity which concerns your sponsoring, endorsing, or promoting any service or product, including without limitation, the agreement you have with Tiltware, since January 1, 2008.

RESPONSE: Documents responsive to this request will be made available for copying and inspection at The Law Offices of John Henry, P.C., at a mutually agreeable time.

2. All agreements between you and any person for such person or entity to solicit or negotiate any agreements for you to sponsor, endorse, or promote any service or product.

RESPONSE: Documents responsive to this request will be made available for copying and inspection at The Law Offices of John Henry, P.C., at a mutually agreeable time.

3. All videos or audios of any interview you gave in which you mention, sponsor, endorse, or promote any service or product, including without limitation any such interviews in which you mention, sponsor, endorse, or promote Deliverance Poker or Full Tilt Poker.

RESPONSE: No documents responsive to this request exist in the possession, custody, or control of Defendant Mizrachi.

4. All documents you sent to Deliverance Poker or C.Y. Benavides, III, including without limitation any text messages you sent to Deliverance Poker or C.Y. Benavides, III.

RESPONSE: Documents responsive to this request will be made available for copying and inspection at The Law Offices of John Henry, P.C., at a mutually agreeable time.

5. All documents received by you from Deliverance Poker or C.Y. Benavides, III, including without limitation any text messages you received from Deliverance Poker or C.Y. Benavides, III.

RESPONSE: Documents responsive to this request will be made available for copying and inspection at The Law Offices of John Henry, P.C., at a mutually agreeable time.

6. All communications you sent to Tiltware or any of its agents or representatives, including without limitation any text messages sent to Tiltware or any of its agents or representatives.

RESPONSE: No documents responsive to this request exist in the possession, custody, or control of Defendant Mizrachi.

7. All communications you received from Tiltware or any of its agents or representatives, including without limitation any text messages you received from Tiltware or any of its agents or representatives.

RESPONSE: No documents responsive to this request exist in the possession, custody, or control of Defendant Mizrachi.