

IN THE CIRCUIT COURT OF COLBERT COUNTY, ALABAMA

JOHN R. BENN,

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Plaintiff,

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v.

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Case Number: CV-2002-184

ROBERT NOVAK,

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Defendant.

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DEFENDANT'S RESPONSE TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION

1. Any documents reflecting Defendant's communications with the Alabama State Bar.

ANSWER: Enclosed

2. Any documents reflecting communications Defendant received from the Alabama State Bar.

ANSWER: Enclosed

3. Any documents in the nature of IRS Form 941, or other similar forms for reporting payroll taxes, filed by Defendant and covering the period January 1, 2000, to present.

ANSWER: Objection, over broad. Defendant objects on the basis that and insofar as the Request of complaints is over board and calls for an expansive potential reach of information that is unreasonable in scope and parameter. Further this request is not calculated to lead to the discovery of admissible evidence.