

**IN THE CIRCUIT COURT OF JACKSON COUNTY, MISSOURI
AT INDEPENDENCE**

SAMUEL K. LIPARI)	
(Statutory Trustee of Dissolved)	
Medical Supply Chain, Inc.))	
)	
Plaintiff <i>pro se</i>,)	
)	
v.)	Case No. 0616-CV07421
)	
GENERAL ELECTRIC COMPANY, et al.,)	Division 2
)	
Defendants.)	

INTERROGATORIES TO PLAINTIFF

Defendants General Electric Company, General Electric Capital Business Asset Funding Corporation and GG Transportation Systems Global Signaling, LLC (“GE Defendants”) propound the following interrogatories on Plaintiff Samuel K. Lipari. Plaintiff shall answer the following interrogatories, under oath, and within 30 days of service of this request.

INSTRUCTIONS

All aspects of the interrogatories are to be construed in a manner consistent with the Rules of this Court. In determining the definition or meaning to these interrogatories, the responding party shall ascribe to each question its plain and ordinary meaning as found in Webster’s Dictionary or any other generally recognized dictionary. When you identify an individual, state the persons first and last name and an address and phone number where that person can be reached.

DEFINITIONS

1. The term "you" and "Lipari" shall mean the same as Samuel K. Lipari.

INTERROGATORIES

1. Identify all representatives, officials, or individuals employed by or representing the City of Blue Springs with whom you discussed the City’s alleged approval of Medical

Supply Chain's ("MSC") purchase and occupation of the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

ANSWER:

2. Identify all representatives, officials, or employees or representatives of the City of Blue Springs, Missouri, who supposedly provided approval for the use of the building at 1600 N.E. Coronado Drive, Blue Springs, Missouri, as a corporate headquarters of a hospital supply chain technology company.

ANSWER:

3. Identify all representatives, officials, committees, boards, (including the identification of the individual members of the committee and boards) with whom you met to gain approval from the City of Blue Springs regarding MSC's purchase and occupation of the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

ANSWER:

4. Identify all representatives of GE Capital with whom you worked in the attempt to secure a 20 year mortgage at 5.4% on the full purchase price of \$6.4 million with the first year moratorium for the purchase of the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

ANSWER:

5. Identify the individual at GE Capital whom you claim approved your loan or mortgage identified in your Petition.

ANSWER:

HUSCH & EPPENBERGER, LLC

By: _____
John K. Power # 70448
Leonard L. Wagner #39783
1200 Main Street, Suite 2300
Kansas City, MO 64105
Telephone: (816) 421-4800
Facsimile: (816) 421-0596
john.power@husch.com
leonard.wagner@husch.com

ATTORNEYS FOR GENERAL ELECTRIC
COMPANY, GENERAL ELECTRIC CAPITAL
BUSINESS ASSET FUNDING CORPORATION
AND GE TRANSPORTATION SYSTEMS
GLOBAL SIGNALING, LLC

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing was forwarded this ____ day of August, 2007, by email, hand delivery, and first class mail, postage prepaid to:

Samuel K. Lipari
297 NE Bayview
Lee's Summit, MO 64064
