

**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.)	

REQUEST FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF

Defendants Defendants General Electric Company, General Electric Capital Business Asset Funding Corporation and GG Transportation Systems Global Signaling, LLC (“GE Defendants”) hereby requests Plaintiff Samuel K. Lipari to produce the following described documents at the times and dates listed below.

TIME AND PLACE OF PRODUCTION

GE Defendants requests that Plaintiff produce the documents designated below for inspection and copying at the offices of Husch & Eppenberger, LLC, 1200 Main Street, Suite 2300, Kansas City, MO 64105, thirty (30) days from the date of service of this Request or at such other time and place as may be agreed to by the parties.

DEFINITIONS AND INSTRUCTIONS

- A. Unless otherwise specified, each document request herein pertains to documents in your possession, custody or control, prepared in connection with, reflecting or relating in any way to any fact, occurrence, thing or other matter described.

- B. If you wish to assert a claim of privilege regarding any responsive document, identify such document by providing its date, its signer, each person who participated in its preparation, its addressee, the person or persons by whom it was received, the general subject

matter thereof, the last known location and custodian of the original of the document (or, if that is unavailable, the most legible copy thereof), and the basis for your claim of privilege with respect thereto.

C. As set forth in 60-234(b), documents are to be produced either as they are kept in the usual course of business or in groups responsive to each of the numbered paragraphs set forth below, and you are to indicate with respect to each group of documents produced the paragraph to which the group is responsive.

D. Numbered paragraphs of this request for production which cannot be responded to in full shall be answered as completely as possible, and for incomplete responses, please specify the reasons for the incompleteness, as well as setting forth whatever knowledge, information or belief you possess with regard to each unanswered or partially answered numbered paragraph of the request for production of documents.

E. For purposes of this request, the following definitions will apply:

1. As used herein, "you" and "your" means Plaintiff Samuel K. Lipari and any present or former agents, employees, representatives or any other persons acting or purporting to act on behalf of, or in connection with, such Plaintiff.

2. The word "document," as used herein, includes (but is not necessarily limited to) any writing, drawing, graph, chart, photograph, phonorecord, electromagnetic medium, object, recording, data compilation, e-mail, internet, intranet, other tangible thing or physical matter of whatever character, both originals and all non-identical copies thereof, which constitutes, stores or contains any form of information relating to the subject matter of the pending action, and which is in your possession, custody or control. If any document described herein is not in your possession, custody or control, but a copy of such document is in your possession, custody or control, the description applicable to such document shall be deemed to include a copy thereof.

DESIGNATION OF DOCUMENTS TO BE PRODUCED

1. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect any communications, including the communications themselves, between you and any representative, official, or employee of the City of Blue Springs regarding the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

RESPONSE:

2. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect any communications, including the communications themselves, between you and any representative, official, or employee of the City of Blue Springs Chain regarding Medical Supply Chain (“MSC”).

RESPONSE:

3. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect any meetings between any representative of MSC and any representative, official, employee, of the City of Blue Springs regarding the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

RESPONSE:

4. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect any meetings between any representative of MSC and any representative, official, employee, of the City of Blue Springs regarding MSC.

RESPONSE:

5. Any minutes of any meeting with the City of Blue Springs in which MSC or its representative or agent attended the meeting.

RESPONSE:

6. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect any approvals, including the approval itself, by the City of Blue Springs regarding MSC's purchase and occupation of the building located at 1600 N.E. Coronado Drive, Blue Springs, Missouri.

RESPONSE:

7. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect, including the communications themselves, any contact between any representative of MSC and the City of Blue Springs' attorney.

RESPONSE:

8. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect that the City of Blue Springs approved any proposal, presentation, or request made by MSC or any of its representatives.

RESPONSE:

9. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect GE Capital's approval of a 20 year mortgage at 5.4 percent on a full purchase price of \$6.4 million with a moratorium on the first full year of mortgage payments.

RESPONSE:

10. All documents that memorialize, corroborate, substantiate, evidence or in any way reflect all communications between MSC or its representatives and GE Capital or its representatives.

RESPONSE:

11. All loan documents pertaining to the purported 20 year mortgage at 5.4 percent on the full purchase price of \$6.4 million with a moratorium on the first full year of mortgage payments.

RESPONSE:

HUSCH & EPPENBERGER, LLC

By: _____

John K. Power # 70448
Leonard L. Wagner #39783
1200 Main Street, Suite 2300
Kansas City, MO 64105
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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
