

# Husch & Eppenberger, LLC

Attorneys and Counselors at Law

[leonard.wagner@Husch.com](mailto:leonard.wagner@Husch.com)

1200 Main Street, Suite 2300  
Kansas City, Missouri 64105-2122  
816.421.4800  
Fax 816.421.0596  
[www.husch.com](http://www.husch.com)

April 13, 2007

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

Re: *Samuel K. Lipari v. General Electric Company, et al.*

Dear Mr. Lipari:

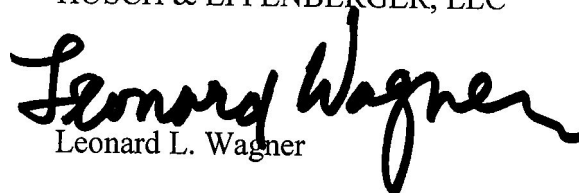
I am writing in response to your letter dated April 7, 2007. Your letter refers to "requested discovery documents" and asserts that you have received a "frivolous blanket denial of discovery." Your letter did not specify, but I assume you are writing in reference to the responses served on February 20, 2007 to the following three sets of requests for production of documents served by plaintiff upon defendants General Electric Company, General Electric Capital Business Assets Funding Corporation, and GE Transportation Systems Global Signaling, LLC: 1) Plaintiffs Requests for Production of Documents; 2) Plaintiffs Requests for Production of Insurance Documents; and 3) Plaintiffs Requests for Production of Attorney Client Privilege Documents.

The responses served to the 52 separate requests for production of documents set forth within those three sets of requests included detailed objections as appropriate. Certain of the responses also indicated that no such documents exist. Other responses indicated that the defendants do not have any such documents in their possession, custody or control. Finally, some of the responses further indicated that to the extent the request was not objectionable, the requested documents have previously been produced to you.

The defendants have fully responded to your discovery requests, and your letter raises no issue with any of the objections that were raised. If you wish to discuss any issue you have with the objections asserted or you believe the referenced documents have not been previously produced, please advise.

Sincerely,

HUSCH & EPPENBERGER, LLC

  
Leonard L. Wagner

LLW/amh

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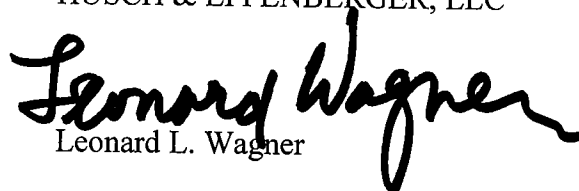
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