

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI

SAMUEL K. LIPARI)
(Statutory Trustee of Dissolved)
Medical Supply Chain, Inc.))
)
Plaintiff,)
)
v.) Case No. 06-0573 .CV-W-F.JG
)
GENERAL ELECTRIC COMPANY, et al.)
)
Defendants.)

INITIAL DISCLOSURES OF GENERAL ELECTRIC COMPANY,
GENERAL ELECTRICAL CAPITAL BUSINESS ASSETS FUNDING CORPORATION,
GE TRANSPORTATION SYSTEMS GLOBAL SIGNALING LLC,

COME NOW General Electric Company ("GE"), General Electric Capital Business Assets Funding Corporation ("GE Capital"), and GE Transportation Systems Global Signaling, LLC ("GE Transportation") (collectively the "GE defendants") make the following initial disclosures pursuant to Fed. R. Civ. P. 26(a)(1) based on the information presently known or reasonably available. The information, documents and identity of persons the OR defendants may rely on to support its claims in this case may change as the case develops. The following disclosures are thus made with the caveat that the GE defendants will continue to investigate this matter further and will conduct discovery) and to the extent appropriate, and as required by the rules, it will amend and/or supplement these disclosures as additional information is obtained or becomes known, or its significance becomes apparent. In making these disclosures, the GE defendants reserve the right to object to any further disclosure or discovery on the grounds of privilege or as otherwise appropriate.

A. Name, and if known" the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identified in the subjects and information.

t~ Lynn James Evcba rd

The knowledge of Medical Supply Chain, its attempts to get financing from other sources and facts and circumstances regarding the factual allegations of the Complaint.

2. Sam Lipari

The operations of Medical Supply Chain, the dissolution of Medical Supply Chain, communications with the defendants and the facts and circumstances regarding the factual allegations of the Complaint.

3. Brett Landrith

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4. Barry Pri ce

Knowledge regarding the property in question and interest in the property.

5. Scot t Asner

Knowledge regarding the properly in question and interest in the property.

6. Allen Lefko
Groin Valley Bank

Knowledge regarding Medical Supply Chain's abilittes to buy or lease the properties,

7. Pat Campbell
Gold Bank

Knowledge regarding Medical Supply Chain's abilities to buy or lease the properties.

8. Randy Castle
Jacome Bank

Knowledge regarding Medical Supply Chain's abilities to buy or lease the properties.

9. Joan Mark
Consultant

Knowledge regarding Medical Supply Chain's abilities to buy or lease the properties,

10. George Fricke

Discussions with Lipari and Landrith regarding the property, his authority with regard to the property and the facts and circumstances regarding the factual allegations of the Complaint.

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13. Tom Davis

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14. Gary Jakaitis

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15. John Phillips

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16. Doug Mackay

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17. City of Blue Springs Economic Development Director

Communications with Lipari and Landrith regarding the property in question and the facts and circumstances regarding the factual allegations of the Complaint,

18. City of Blue Springs Attorney

Communications with Lipari and Landrith regarding the property in question and the facts and circumstances regarding the factual allegations of the Complaint

19. All other persons identified by any other party to this lawsuit.

B. Copy of or description by category and location of, all documents, data) compilations, and tangible things that are in the possession, custody or control of the party and that the disclosing party may be used to support its claims or defenses unless solely for impeachment:

1. All written communications between the parties,
2. All documents provided by a MSC representative to any of the GE defendants.
3. All documents provided by OE representatives to representatives of MSC.
4. All documents identified by other parties to this lawsuit.

C. Computation of Damages.

The GE Defendants are not yet claiming any damages in this case.

D. Insurance.

Not applicable.

I-IUSCI-I & EPPENBERGER, LLC

By: John K. Power

John K. Power, # 70448
1201 Main Street, Suite 2300
Kansas City, MO 64105
Telephone: (816) 421-4800
Facsimile: (816) 421-0596

by Jason B. Moore
MO Bar #
54592

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 instrument "was forwarded this 27th day of September, 2006) by first class mail) postage prepaid to:

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

John K. P.
by Jason B. Moore
MO Bar #54592

**IN THE UNITED STATES DISTRICT COURT
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SAMUEL K. LIPARI)	
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HUSCH & EPPENBERGER, LLC

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Telephone: (816) 421-4800
Facsimile: (816) 421-0596

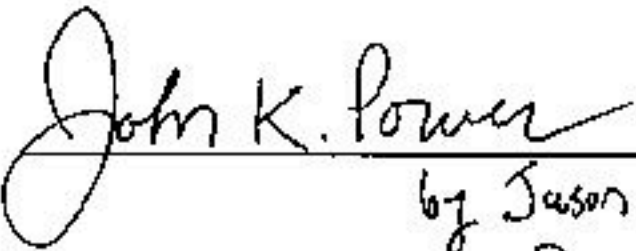
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