

**IN THE STATE OF MISSOURI
JACKSON COUNTY DISTRICT COURT
AT INDEPENDENCE,
MISSOURI**

SAMUEL K. LIPARI)
(Assignee of Dissolved)
Medical Supply Chain, Inc.))
Plaintiff)
)
vs.)
)
GENERAL ELECTRIC COMPANY,)
GENERAL ELECTRIC CAPITAL)
BUSINESS ASSET FUNDING CORP.,)
GE TRANSPORTATION SYSTEMS)
GLOBAL SIGNALING, L.L.C.)
Defendants)

Case No. 0616-cv07421

ANSWER TO DOCUMENT PRODUCTION REQUEST

Comes now the petitioner, Samuel K. Lipari (“plaintiff”) appearing pro se and makes the following answer to defendants’ document production request.

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:

The plaintiff provided the Missouri State Court notice of service upon the defendants of the names of witnesses and documents related to his claims on 7/05/2006 including documents that may fit the description of the documents described in this numbered production request. The plaintiff again provided an updated disclosure of witnesses and documents as required by the Western District of Missouri federal court Rule 26 case management order conference, during the defendants’ fraudulent removal of this action. The plaintiff personally again delivered by hand approximately 4000 documents related to his claims including documents that may be described as requested

in this document production request, along with a detailed table of contents by bates number in March, 2007.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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

RESPONSE:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

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:

The plaintiff repeats his answer for production request number 1.

OATH

I the undersigned hereby swear under oath to the truth of the above statements regarding the production of documents requested by the defendants.

Samuel K. Lipari

Date

Respectively submitted,

Samuel K. Lipari
Pro se

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and accurate copy of the foregoing instrument was served on this 17th day of September, 2007, by hand delivery to:

John K. Power, Esq.
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