

**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 INTERROGATORIES

Comes now the petitioner, Samuel K. Lipari (“plaintiff”) appearing pro se and makes the following answers to defendants’ 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:

The complaint identifies the economic development officer for the City of Blue Springs and the city attorney that my attorney Bret D. Landrith spoke to on my behalf to see if a corporate headquarters with above living wage jobs in the hospital supply business would be a suitable occupant for the building and to inquire what the process would be to obtain the approval. He was assured that such a business would be desirable to the city and fulfill their development goals. Subsequently, General Electric appeared to be repudiating their contract and we did not go before the Blue Springs City Council. When questioned about whether they were repudiating the contract, GE Capital’s

corporate counsel Mrs. Kate O'Leary identified in the complaint revealed that GE had also communicated to the City of Blue Springs regarding the approval of MSC's occupancy and in my business judgment decided it would be best to resolve our contract issues with General Electric before proceeding with the approval process. I do not interpret the contract as requiring MSC to secure the approval. I placed the approval requirement as a condition to protect MSC in the event that Blue Springs decided that MSC could not occupy the building. I have never received notice from the City of Blue Springs that MSC would be unwelcome as an occupant and to my knowledge MSC has not been rejected. Bret D. Landrith and I returned to the City of Blue Spring's offices prior to my re-filing this complaint in state court and we were informed the economic development officer was no longer there. A city councilman or manager was temporarily taking over the economic development responsibilities and reaffirmed that a corporate headquarters for a hospital supply business would be an appropriate use of the building. Mrs. Kate O'Leary's address and telephone number are unknown and have not been turned over in defendant's discovery production.

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:

My answer is the same as I answered for question number 1.

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:

My answer is the same as I answered for question number 1.

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:

The complaint identifies Mr. Doug McKay with GE Capital. Mr. Doug McKay's address and telephone number are unknown and have not been turned over in defendants' discovery production.

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

ANSWER:

The complaint and the representations of the plaintiff have never stated that GE Capital approved a mortgage. The complaint identifies the GE property manager, Mr. George Frickie with the authority to make decisions regarding the Blue Springs property and represented to me that The General Electric Company's "business leaders" had accepted a contract where GE Capital or its underwriter (understood by me and GE Capital to be GE which is listed on the New York Stock exchange and sells bonds and stock to fund GE Capital). Mr. George Frickie's address and telephone number are unknown and have not been turned over in defendants' discovery production.

OATH

I the undersigned hereby swear under oath to the truth of the above statements in answer to the interrogatories made 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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