

**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

**SECOND ANSWER TO DOCUMENT PRODUCTION REQUEST**

Comes now the petitioner, Samuel K. Lipari (“plaintiff”) appearing pro se and makes the following answer to defendants’ second document production request. Note the defendants failed to provide a disk or to email a copy of their questions as required under Missouri rules.

**1. Production request damages.**

**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. Production request ledgers.**

RESPONSE:

The plaintiff repeats his answer for production request number 1.

RESPONSE:

**3 Production request dissolution.**

RESPONSE:

The plaintiff repeats his answer for production request number 1 with the additional comment that the plaintiff will use Missouri Secretary of State documents readily available to the defendants to respond to any challenges by the defendants over dissolution.

**4 Production request assignment.**

RESPONSE:

The plaintiff repeats his answer for production request number 1 with the additional comment that the plaintiff will use Missouri Secretary of State documents readily available to the defendants to respond to any challenges by the defendants over assignment.

**OATH**

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

S/Samuel K. Lipari  
Samuel K. Lipari

10/01/07  
Date

Respectively submitted,

S/Samuel K. Lipari

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 1<sup>st</sup> day of October, 2007, by hand delivery to:

John K. Power, Esq.  
Husch & Eppenberger, LLC  
1700 One  
Kansas City Place  
1200 Main Street  
Kansas City, MO  
64105-2122

S/Samuel K. Lipari  
Samuel K. Lipari  
297 NE Bayview  
Lee's Summit, MO 64064  
816-365-1306  
saml@medicalsupplychain.com  
Pro se