

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

LYDIA CLADEK, INC.,

Debtor.

**CASE NO. 3-10-bk-02805-PMG
CHAPTER 11**

**THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS'
NOTICE OF SERVICE OF SUBPOENAS**

The Official Committee of Unsecured Creditors, by and through its undersigned counsel, hereby gives notice of the issuance of a Subpoena on the following, which are attached hereto as Exhibits A, B, and C, respectively:

- a. John Pitcher a/k/a Jack Pitcher;
- b. Mark Healy; and
- c. Corporate Representative of Michael Moecker & Associates, Inc.

Dated this 19th day of November 2010.

Respectfully submitted,

/s/ Jon E. Kane

Jon E. Kane, Esq.
Florida Bar No. 814202
Burr & Forman, LLP
450 S. Orange Avenue, Suite 200
Orlando, FL 32801
Telephone: (407) 244-0888
Fax: (407) 244-0889
Email: jkane@burr.com

**ATTORNEYS FOR THE OFFICIAL
COMMITTEE OF UNSECURED
CREDITORS**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the forgoing has been served on November 19, 2010 via U.S. Mail and/or the court's electronic CM/ECF electronic mail upon all parties and counsel on the attached Amended Official Service List as of September 20, 2010.

/s/ Jon E. Kane

Jon E. Kane. Esq.

Lydia Cladek, Inc.
Case No.: 3:10-bk-2805-PMG
AMENDED OFFICIAL SERVICE LIST
(amended as of September 20, 2010)

Michael Phelan
Chapter 11 Trustee
3613 North 29th Ave.
Hollywood, FL 33020

Jacob A. Brown, Esq.
Akerman Senterfitt
50 North Laura Street, Suite 2500
Jacksonville, FL 32202

Lydia Cladek, Inc.
108 Seagrove Main Street
St. Augustine, FL 32080

Lawrence Lilly, Esq.
336 Redwing Lane
St. Augustine, FL 32080-7979

Lydia I. Cladek
189 Sea Colony Parkway
St. Augustine, FL 32080

Lydia I. Cladek
1001 Lindgren Blvd.
Sanibel, FL 33957

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135 W. Central Blvd., Suite 620
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Quincy, IL 62305

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Bristol, WI 53104-9732

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c/o Bennett Yell
9075 June Lane
St. Augustine, FL 32080

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Michael Egelman
c/o Michael Egelman
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St. Augustine, FL 32086

RAD Management Company
c/o Donald R. Radbill
221 N. Forest Dune Dr.
St. Augustine, FL 32080

Internal Revenue Service
Centralized Insolvency Operations
PO Box 21126
Philadelphia, PA 19114-0326

Internal Revenue Service
Special Procedures – Stop 5720
400 W Bay Street Suite 35045
Jacksonville, FL 32202

Alan M. Weiss, Esq.
50 North Laura Street, Suite 3900
Jacksonville, FL 32202

Wm. Patrick Fulford, Esq.
505 Maitland Avenue, Suite 100
Altamonte Springs, FL 32701

Florida Department of Revenue
5050 W. Tennessee Street
Tallahassee, FL 32399-0145

U.S. Securities & Exchange
Commission
Reorganization Branch, Atlanta
3475 Lenox Rd., NE, Ste. 1000
Atlanta, GA 30326-3235

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Chapel Hill, NC 27516

Alma Obinger
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Deptford, NJ 08096

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Oakdale, NY 11769

Brigitte and Steven Neiswender
14 King Eider Way
Taylors, SC 29687

Harold W. Thompson
Irene E. Thompson
12 King Eider Way
Taylors, SC 29687

Tennessee Department of Revenue
c/o Tennessee Attorney General's Office
Bankruptcy Division
P.O. Box 20207
Nashville, TN 37202-0207

Marshall B. Hall
3123 S. Ponte Vedra Blvd.
Ponte Vedra, FL 32082-4535

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1112 Southeast 22nd Avenue
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Greensboro, NC 27408

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c/o Laura Beth Faragasso, Esq.
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Tallahassee, FL 32317-4079

Michael J. McCabe, Esq.
Eric S. Vaughn, Esq.
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Jacksonville, FL 32207

Don-Fran Page
3316 Parkridge Rd. #137
Waterloo, IA 50701

EXHIBIT A

B256 – Subpoena in a Case under the Bankruptcy Code (12/07)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

LYDIA CLADEK, INC.,

Debtor.

**SUBPOENA IN
BANKRUPTCY PROCEEDING**

**Case No.: 3:10-BK-02805-PMG
Chapter 11**

**TO: John Pitcher a/k/a Jack Pitcher
128 Island Cottage Way
St. Augustine, FL 32080**

YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above adversary proceeding.

PLACE	COURT ROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above bankruptcy proceeding.

PLACE	DATE AND TIME
Law Offices of Akerman Senterfitt 50 N. Laura Street, Suite 2500 Jacksonville, FL 32202	December 2, 2010 at 1:00 p.m.

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME

Any organization not a party to this proceeding that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents or other person who consent to testify on its behalf, and may set forth for each person designated, the matters on which the person will testify. Rule 30(b)(6), Federal Rules of Civil Procedure, made applicable in bankruptcy cases and proceedings by Rules 1018, 7030, and 9014, Federal Rules of Bankruptcy Procedure.

ISSUING OFFICER SIGNATURE AND TITLE	DATE
x _____ Attorney for Official Committee of Unsecured Creditors of Lydia Cladek, Inc.	November 17, 2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Jon Kane, Esquire, Fla. Bar No. 814202, Burr & Forman, LLP, 450 S. Orange Avenue, Suite 200, Orlando, FL 32801, Telephone: (407) 244-0888

B256 – Subpoena in a Case under the Bankruptcy Code (12/07)

PROOF OF SERVICE

SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	MANNER OF SERVICE	
SERVED BY (PRINT NAME)	TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006, made applicable in cases under the Bankruptcy Code by Rule 9016, Federal Rules of Bankruptcy Procedure:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or

inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

- (i) fails to allow reasonable time for compliance;
- (ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;
- (iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) If a subpoena

- (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

- (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

- (iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect

a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A)

EXHIBIT D

B256 - Subpoena in a Case under the Bankruptcy Code (12/07)

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

In re:

LYDIA CLADEK, INC.,

Debtor.

**SUBPOENA DUCES TECUM IN
BANKRUPTCY PROCEEDING**

**Case No.: 3:10-bk-02805-PMG
Chapter 11**

**TO: Mark Healy
Michael Moecker & Associates, Inc.
841 Prudential Drive, 12th Floor
Jacksonville, FL 32207**

YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above adversary proceeding.

PLACE	COURT ROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above bankruptcy proceeding.

PLACE	DATE AND TIME
Law Offices of Akerman Senterfitt 50 N. Laura Street, Suite 2500 Jacksonville, FL 32202	December 1, 2010 at 10:00 a.m.

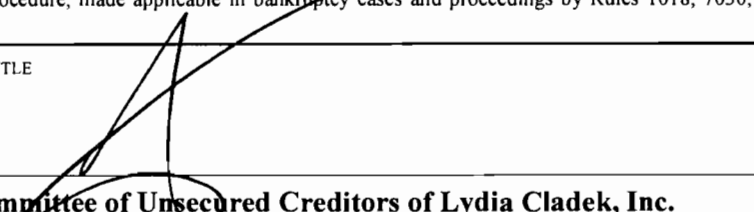
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **SEE SCHEDULE A**

PLACE	DATE AND TIME
Law Offices of Akerman Senterfitt 50 N. Laura Street, Suite 2500 Jacksonville, FL 32202	December 1, 2010 at 10:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

Any organization not a party to this proceeding that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents or other person who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Rule 30(b)(6), Federal Rules of Civil Procedure, made applicable in bankruptcy cases and proceedings by Rules 1018, 7030, and 9014, Federal Rules of Bankruptcy Procedure.

ISSUING OFFICER SIGNATURE AND TITLE	DATE
 Attorney for Official Committee of Unsecured Creditors of Lydia Cladek, Inc.	November 17, 2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Jon Kane, Esquire, Fla. Bar No. 814202, Burr & Forman, LLP, 450 S. Orange Avenue, Suite 200, Orlando, FL 32801, Telephone: (407) 244-0888

B256 – Subpoena in a Case under the Bankruptcy Code (12/07)

PROOF OF SERVICE

SERVED	DATE	PLACE
SERVED ON (PRINT NAME)	MANNER OF SERVICE	
SERVED BY (PRINT NAME)	TITLE	

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____
DATE

SIGNATURE OF SERVER

ADDRESS OF SERVER

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006, made applicable in cases under the Bankruptcy Code by Rule 9016, Federal Rules of Bankruptcy Procedure:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A)

SCHEDULE A

DEFINITIONS AND INSTRUCTIONS

Unless specifically indicated, or otherwise required by the context in which the terms, names, and instructions are used, the following definitions shall be applicable herein for the purposes of this discovery request only.

1. The words **“any”** and **“all”** shall be considered to include **“each”** and **“each and every.”**

2. **“Accountant”** shall mean Michael Moecker & Associates, Inc., Michael Moecker & Associates, Inc., its past and present employees, its agents, officers, directors, shareholders and employees, its assignors; merged, consolidated or acquired predecessors or successors; divisions, affiliates, units and subsidiaries, whether or not wholly owned; including, but not limited to, all other persons acting or purporting to act on its behalf; experts, persons consulted concerning any factual matter or matters of opinion relating to any of the facts or issues involved in this action, including, but not limited to, its attorneys.

3. **“Accountant Fee Application”** shall mean the Amended Application for Interim Compensation for Michael Moecker & Associates, Inc. (Doc. No. 244).

4. **“Committee”** shall mean the Official Committee of Unsecured Creditors of Lydia Cladek, Inc.

5. The term **“communication”** and **“communications”** shall mean any and all writings, electronic mail, oral communications, conversations by telephone, meeting and any contact, oral or written, formal or informal, at any time or place, under any circumstances whatsoever in which information of any nature was transmitted or exchanged in any form, and

any record or notes of other communications (including interoffice, intra-office communications, electronic memoranda, voicemail messages and all other oral communications) and specifically including Electronically Stored Information ("ESI").

6. **"Debtor"** shall mean Lydia Cladek Inc., its past and present employees, agents, representatives, counsel and all other persons or entities acting or purporting to act under its control.

7. As used in this Request, the term **"document"** or **"documents"** shall mean the original and any non-identical copies (whether different from the original because of notations made on or attached to a copy or otherwise), of any written, graphic, or otherwise recorded matter however produced, and drafts and both sides thereof, whether inscribed by hand, printed, created and stored on computer software or hardware, or recorded by mechanical, electronic, microfilm, photographic, phonic, or any other means including material printed or recorded electronically or magnetically or stored in any type of data bank, computer, or storage device including, but not limited to, the following: abstracts, address books, advertisements, advertising materials, agendas, agreements, analyses of any kind, appointment books, audio cassettes, bids, billings, bulletins, books, books of account, brochures, calendars, catalogs, charts, checks and canceled checks, agreements, checklists, circulars, communications, compilations, computer files and programs, consultant's reports, contracts, correspondence and drafts of correspondence, desk calendars, diagrams, diaries, dictionaries, directories, diskettes, drafts, drawings, electronic mail, electronic mail message, estimates, evaluations, expense records, experts' reports or studies, facsimiles, films, financial statements or calculations, floppy disks, flyers, graphs, instructions, intra-corporate communications, inspection records, sheets and reports, inter- and intra-office memoranda, invoices, layouts, leaflets, ledgers, letters, licenses, lists, logs, mailings, manuals,

maps, memoranda, minutes, movies, notes, notebooks, opinions, outlines, organizational charts, tables, pamphlets, permits, photographs, pictures, prints, projections, promotional materials, press releases or clippings, publications, procedures, quotations, records, records or transcripts of statements, depositions, conversations, meetings, discussions, conferences or interviews, whether in person or by telephone or by other means, recordings, renderings, reports, schedules, scripts, sketches, slides, specifications, statistical analyses, studies, summaries, tabulations, tallies, tapes, tape recordings, telegrams, teletype messages, telefax messages, telephone logs, time sheets, transcripts, undertakings, work assignments, worksheets, video cassettes, videotapes, papers and files, summaries of personal conversations or interviews, notes or summaries of conversation, minutes, notes or records of meetings or conferences, opinions or reports of consultants, projections, statistical statements, computer stored matter, magnetic tapes, microfilm, microfiche, all other records kept by electronic, photographic, or mechanical means, records and paper and things similar to any of the foregoing, however denominated, specifically including any information stored at any time in any electronically stored data on magnetic or optical storage media as an "active" file or files (readily readable by one or more computer applications or forensics software); any "deleted" but recoverable electronic files on said media; any electronic file fragments (files that have been deleted and partially overwritten with new data); and slack (data fragments stored randomly from random access memory on a hard drive during the normal operation of a computer [RAM slack] or residual data left on the hard drive after new data has overwritten some but not all of previously stored data), in your possession, custody, or control, your agents, or your attorneys and their agents. Document shall also mean the transcript of any deposition taken in any other action, which contains information called for in this request.

8. The terms "**Electronically Stored Information**" or "**ESI**" shall include all electronic information permitted under Rule 34 of Federal Rules of Civil Procedure, including, without limitation: word-processing documents; spreadsheets; presentation documents; graphics; animations; images; email (including attachments which shall be kept with the email); instant messages; text messages; log files; source code; compressed files; voice mail; audio, video, and audiovisual recordings; databases and database subsets; and other user, or machine created, computer files or other digital information which is stored on computer networks, servers, computer systems, desktop computers, laptop computers, home computers, the Internet, an intranet, archives, discs, CDs, DVDs, other optical media, diskettes, drives, zip drives, tapes, cartridges, other magnetic media, flash drives, and other external storage media, personal digital assistants, handheld wireless devices, cellular telephones, Blackberries, iPods, pagers, and voicemail systems.

9. "**Persons**" shall mean natural persons, corporations, firms, companies, partnerships, unincorporated associations, governmental or public agencies, joint ventures, and all other entities.

10. "**Referring to**" or "**relating to**" shall mean constituting or evidencing and directly or indirectly mentioning, describing, referring to, pertaining to, being connected with or reflecting upon the stated subject matter.

11. "**Trustee**" shall mean Michael P. Phelan, in his capacity as Chapter 11 Trustee of the bankruptcy estate of Lydia Cladek, Inc. and all other persons or entities acting or purporting to act under his control or on his behalf, including but not limited to employees, agents and attorneys.

12. **"Trustee Fee Application"** shall mean the Amended Application for Interim Compensation for Michael P. Phelan, Trustee Chapter 11 (Doc. No. 243).

13. **"You"** shall mean Mark Healy, his agents, assigns, and all other persons acting or purporting to act on his behalf.

14. The singular of any word shall include the plural, and the plural of any word shall include the singular.

15. To the extent that you consider any of the following Requests objectionable, respond to so much of each Request and part thereof, as is not objectionable in your view and separately state that part of each Request as to which you raise objection and each ground for such objection.

16. Each and every request for a document or documents to be produced requires production of the document, in its entirety, without abbreviation or expurgation.

17. More than one paragraph of this request may ask for the same document. The presence of such duplication is not to be interpreted to narrow or limit the normal interpretation placed upon each individual request. Where a writing is requested in more than one numbered paragraph, only one copy of it need be produced.

18. If any document is withheld under claim of privilege or work product, furnish a list identifying each document for which the privilege or work product is claimed, together with the following information for each such document: date, sender, recipient, persons to whom copies were furnished, job titles of each of these persons, subject matter of the document, number of pages in the document, the basis on which the privilege or work product is claimed, the paragraph or paragraphs of this request to which the document responds, the subject matter of

the document and the person in whose custody the document is presently located, and whether any matter that is not privileged or not work product is discussed or mentioned in that document.

19. If any document requested was, but is no longer in the possession or subject to the control of the Trustee, or is no longer in existence, state whether it: (i) is missing or lost; (ii) has been destroyed; (iii) has been transferred, voluntarily or involuntarily, to others and state the identity of those persons to whom it has been transferred; (iv) has been otherwise disposed of, and in each instance, explain the circumstances surrounding such disposition, state the date or approximate date thereof, and the identity of the persons with knowledge of such circumstances; and (v) identify the documents that are missing, lost, destroyed, transferred, or otherwise disposed of, by author, date, subject matter, addressee and the number of pages.

20. If you do not clearly understand, or have any questions about, the definitions, instructions, or any request for documents, please contact counsel for Committee promptly for clarification.

21. As to any request that is claimed to be overbroad or to seek irrelevant documents, please indicate whether any responsive documents or subcategory of responsive documents are conceded to be discoverable and identify the documents or subcategory of documents that will be produced.

22. As to any request that is claimed to be unduly burdensome, expensive or oppressive or to which a similar objection is asserted, please provide the following information: (i) the approximate number and/or volume of responsive documents; (ii) the location and manner in which the documents are maintained; (iii) any particular or unusual burden or effort required to produce the responsive documents; (iv) the estimated cost of producing responsive documents;

and (v) any other facts on which you rely in support of your claim that production of responsive documents is unduly burdensome, costly or difficult.

23. Pursuant to Federal Rules of Civil Procedure 34, made applicable through Federal Rules of Bankruptcy Procedure 7034, all documents must be produced as they are kept in the usual course of business, including ESI, or must be organized and labeled to correspond to the categories of documents requested below. Each and every request for a document or documents to be produced requires production of the document, in its entirety, without abbreviation or expurgation.

24. Production of Documents in Electronic Format. As to all electronically stored information and Documents or communications existing in electronic format, including, but not limited to, electronic mail, please provide diskettes containing such data, CDR discs, or other portable storage media. *All Documents existing in electronic format shall be provided in their native format with accompanying metadata* (for example, but not by way of limitation, emails sent or received using Microsoft Outlook should be produced on CDR disc in ".PST" format).

25. Each request herein shall be deemed continuing so as to require prompt supplemental responses, to the extent required by the Federal Rules of Civil Procedure, if information called for herein is obtained, discovered or created subsequent to the time of responding to these requests.

26. This request covers all documents from April 5, 2010 to date, unless the specific request calls for a different time period.

DOCUMENTS TO BE PRODUCED

1. All documents which You intend to admit into evidence or rely upon at any hearing on the Accountant Fee Application and/or the Trustee Fee Application.

2. All documents, including time sheets, correspondence, notes, records, invoices, worksheets, correspondence and billing statements, which evidence, support or relate to the work You performed as set forth in the Accountant Fee Application and/or the Trustee Fee Application and attachments thereto.

3. All documents, including time sheets, correspondence, notes, records, invoices, worksheets, correspondence and billing statements which evidence, support or relate to the work performed by the Accountant as set forth in the Accountant Fee Application and/or the Trustee Fee Application and the attachments thereto.

4. All communications relating to the Accountant Fee Application and any objections thereto, including e-mail communications.

5. All communications relating to the Trustee Fee Application and any objections thereto, including e-mail communications.

EXHIBIT E

UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION

In re:

LYDIA CLADEK, INC.,

Debtor.

SUBPOENA DUCES TECUM IN
BANKRUPTCY PROCEEDING

Case No.: 3:10-bk-02805-PMG
Chapter 11

TO: The Corporate Representative of MICHAEL MOECKER
& ASSOCIATES, INC. with the most knowledge
regarding the issues listed on the attached SCHEDULE A
c/o Michael Moecker & Associates, Inc.
3613 N. 29th Avenue
Hollywood, FL 33020

YOU ARE COMMANDED to appear in the United States Bankruptcy Court at the place, date, and time specified below to testify in the above adversary proceeding.

PLACE	COURT ROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above bankruptcy proceeding.

PLACE	DATE AND TIME
Law Offices of Akerman Senterfitt 50 N. Laura Street, Suite 2500 Jacksonville, FL 32202	December 1, 2010 at 10:00 a.m.

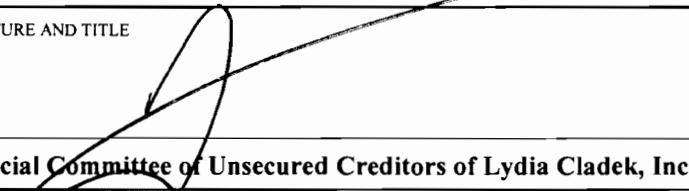
YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects): **SEE SCHEDULE B**

PLACE	DATE AND TIME
Law Offices of Akerman Senterfitt 50 N. Laura Street, Suite 2500 Jacksonville, FL 32202	December 1, 2010 at 10:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
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Any organization not a party to this proceeding that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents or other person who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Rule 30(b)(6), Federal Rules of Civil Procedure, made applicable in bankruptcy cases and proceedings by Rules 1018, 7030, and 9014, Federal Rules of Bankruptcy Procedure.

ISSUING OFFICER SIGNATURE AND TITLE	DATE
 x _____ Attorney for Official Committee of Unsecured Creditors of Lydia Cladek, Inc.	November 19, 2010

ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Jon Kane, Esquire, Fla. Bar No. 814202, Burr & Forman, LLP, 450 S. Orange Avenue, Suite 200, Orlando, FL 32801, Telephone: (407) 244-0888

PROOF OF SERVICE

SERVED	DATE	PLACE
SERVED ON (PRINT NAME)		MANNER OF SERVICE
SERVED BY (PRINT NAME)		TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____

ADDRESS OF SERVER _____

Rule 45, Federal Rules of Civil Procedure, Subdivisions (c), (d), and (e), as amended on December 1, 2006, made applicable in cases under the Bankruptcy Code by Rule 9016, Federal Rules of Bankruptcy Procedure:

(c) PROTECTION OF PERSONS SUBJECT TO SUBPOENAS.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court on behalf of which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection, copying, testing, or sampling of designated electronically stored information, books, papers, documents or tangible things, or

inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection, copying, testing, or sampling may, within 14 days after service of the subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to producing any or all of the designated materials or inspection of the premises — or to producing electronically stored information in the form or forms requested. If objection is made, the party serving the subpoena shall not be entitled to inspect, copy, test, or sample the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production, inspection, copying, testing, or sampling. Such an order to compel shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection, copying, testing, or sampling commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a person who is not a party or an officer of a party to travel to a place more than 100 miles from the place where that person resides, is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party

in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) DUTIES IN RESPONDING TO SUBPOENA.

(1) (A) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) If a subpoena does not specify the form or forms for producing electronically stored information, a person responding to a subpoena must produce the information in a form or forms in which the person ordinarily maintains it or in a form or forms that are reasonably usable.

(C) A person responding to a subpoena need not produce the same electronically stored information in more than one form.

(D) A person responding to a subpoena need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or to quash, the person from whom discovery is sought must show that the information sought is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) (A) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) If information is produced in response to a subpoena that is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has and may not use or disclose the information until the claim is resolved. A receiving party may promptly present the information to the court under seal for a determination of the claim. If the receiving party disclosed the information before being notified, it must take reasonable steps to retrieve it. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT. Failure of any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena issued. An adequate cause for failure to obey exists when a subpoena purports to require a nonparty to attend or produce at a place not within the limits provided by clause (ii) of subparagraph (c)(3)(A).

DEFINITIONS AND INSTRUCTIONS

Unless specifically indicated, or otherwise required by the context in which the terms, names, and instructions are used, the following definitions shall be applicable herein for the purposes of this discovery request only.

1. The words **“any”** and **“all”** shall be considered to include **“each”** and **“each and every.”**

2. **“Accountant,” “You,”** and/or **“Your”** shall mean Michael Moecker & Associates, Inc., its past and present employees, its agents, officers, directors, shareholders and employees, its assignors; merged, consolidated or acquired predecessors or successors; divisions, affiliates, units and subsidiaries, whether or not wholly owned; including, but not limited to, all other persons acting or purporting to act on its behalf; experts, persons consulted concerning any factual matter or matters of opinion relating to any of the facts or issues involved in this action, including, but not limited to, its attorneys.

3. **“Accountant Fee Application”** shall mean the Amended Application for Interim Compensation for Michael Moecker & Associates, Inc. (Doc. No. 244).

4. **“Committee”** shall mean the Official Committee of Unsecured Creditors of Lydia Cladek, Inc.

5. The term **“communication”** and **“communications”** shall mean any and all writings, electronic mail, oral communications, conversations by telephone, meeting and any contact, oral or written, formal or informal, at any time or place, under any circumstances whatsoever in which information of any nature was transmitted or exchanged in any form, and any record or notes of other communications (including interoffice, intra-office communications,

electronic memoranda, voicemail messages and all other oral communications) and specifically including Electronically Stored Information (“ESI”).

6. **"Confidentiality Agreement"** means the Confidentiality Agreement entered into between the Trustee and Committee, dated September 30, 2010.

7. **"Debtor"** shall mean Lydia Cladek Inc., its past and present employees, agents, representatives, counsel and all other persons or entities acting or purporting to act under its control.

8. **"Disclosure Statement"** shall mean the Disclosure Statement of Official Committee of Unsecured Creditors filed by the Committee (Doc. No. 294).

9. As used in this Request, the term **"document"** or **"documents"** shall mean the original and any non-identical copies (whether different from the original because of notations made on or attached to a copy or otherwise), of any written, graphic, or otherwise recorded matter however produced, and drafts and both sides thereof, whether inscribed by hand, printed, created and stored on computer software or hardware, or recorded by mechanical, electronic, microfilm, photographic, phonic, or any other means including material printed or recorded electronically or magnetically or stored in any type of data bank, computer, or storage device including, but not limited to, the following: abstracts, address books, advertisements, advertising materials, agendas, agreements, analyses of any kind, appointment books, audio cassettes, bids, billings, bulletins, books, books of account, brochures, calendars, catalogs, charts, checks and canceled checks, agreements, checklists, circulars, communications, compilations, computer files and programs, consultant's reports, contracts, correspondence and drafts of correspondence, desk calendars, diagrams, diaries, dictionaries, directories, diskettes, drafts, drawings, electronic mail, electronic mail message, estimates, evaluations, expense records, experts' reports or studies,

facsimiles, films, financial statements or calculations, floppy disks, flyers, graphs, instructions, intra-corporate communications, inspection records, sheets and reports, inter- and intra-office memoranda, invoices, layouts, leaflets, ledgers, letters, licenses, lists, logs, mailings, manuals, maps, memoranda, minutes, movies, notes, notebooks, opinions, outlines, organizational charts, tables, pamphlets, permits, photographs, pictures, prints, projections, promotional materials, press releases or clippings, publications, procedures, quotations, records, records or transcripts of statements, depositions, conversations, meetings, discussions, conferences or interviews, whether in person or by telephone or by other means, recordings, renderings, reports, schedules, scripts, sketches, slides, specifications, statistical analyses, studies, summaries, tabulations, tallies, tapes, tape recordings, telegrams, teletype messages, telefax messages, telephone logs, time sheets, transcripts, undertakings, work assignments, worksheets, video cassettes, videotapes, papers and files, summaries of personal conversations or interviews, notes or summaries of conversation, minutes, notes or records of meetings or conferences, opinions or reports of consultants, projections, statistical statements, computer stored matter, magnetic tapes, microfilm, microfiche, all other records kept by electronic, photographic, or mechanical means, records and paper and things similar to any of the foregoing, however denominated, specifically including any information stored at any time in any electronically stored data on magnetic or optical storage media as an "active" file or files (readily readable by one or more computer applications or forensics software); any "deleted" but recoverable electronic files on said media; any electronic file fragments (files that have been deleted and partially overwritten with new data); and slack (data fragments stored randomly from random access memory on a hard drive during the normal operation of a computer [RAM slack] or residual data left on the hard drive after new data has overwritten some but not all of previously stored data), in your possession, custody, or

control, your agents, or your attorneys and their agents. Document shall also mean the transcript of any deposition taken in any other action, which contains information called for in this request.

10. The terms "**Electronically Stored Information**" or "**ESI**" shall include all electronic information permitted under Rule 34 of Federal Rules of Civil Procedure, including, without limitation: word-processing documents; spreadsheets; presentation documents; graphics; animations; images; email (including attachments which shall be kept with the email); instant messages; text messages; log files; source code; compressed files; voice mail; audio, video, and audiovisual recordings; databases and database subsets; and other user, or machine created, computer files or other digital information which is stored on computer networks, servers, computer systems, desktop computers, laptop computers, home computers, the Internet, an intranet, archives, discs, CDs, DVDs, other optical media, diskettes, drives, zip drives, tapes, cartridges, other magnetic media, flash drives, and other external storage media, personal digital assistants, handheld wireless devices, cellular telephones, Blackberries, iPods, pagers, and voicemail systems.

11. "**Objection**" shall mean the Chapter 11 Trustee's Response in Opposition to Motion of the Official Committee of Unsecured Creditors to Combine Disclosure Statement and Confirmation Hearing filed by the Trustee (Doc. No. 315).

12. "**Persons**" shall mean natural persons, corporations, firms, companies, partnerships, unincorporated associations, governmental or public agencies, joint ventures, and all other entities.

13. "**Plan**" shall mean the Plan of Reorganization submitted by Official Committee of Unsecured Creditors filed by the Committee (Doc. No. 295).

14. **"Referring to"** or **"relating to"** shall mean constituting or evidencing and directly or indirectly mentioning, describing, referring to, pertaining to, being connected with or reflecting upon the stated subject matter.

15. **"Trustee"** shall mean Michael P. Phelan, in his capacity as Chapter 11 Trustee of the bankruptcy estate of Lydia Cladek, Inc. and all other persons or entities acting or purporting to act under his control or on his behalf, including but not limited to employees, agents and attorneys.

16. **"Trustee Fee Application"** shall mean the Amended Application for Interim Compensation for Michael P. Phelan, Trustee Chapter 11 (Doc. No. 243).

17. The singular of any word shall include the plural, and the plural of any word shall include the singular.

18. To the extent that you consider any of the following Requests objectionable, respond to so much of each Request and part thereof, as is not objectionable in your view and separately state that part of each Request as to which you raise objection and each ground for such objection.

19. Each and every request for a document or documents to be produced requires production of the document, in its entirety, without abbreviation or expurgation.

20. More than one paragraph of this request may ask for the same document. The presence of such duplication is not to be interpreted to narrow or limit the normal interpretation placed upon each individual request. Where a writing is requested in more than one numbered paragraph, only one copy of it need be produced.

21. If any document is withheld under claim of privilege or work product, furnish a list identifying each document for which the privilege or work product is claimed, together with

the following information for each such document: date, sender, recipient, persons to whom copies were furnished, job titles of each of these persons, subject matter of the document, number of pages in the document, the basis on which the privilege or work product is claimed, the paragraph or paragraphs of this request to which the document responds, the subject matter of the document and the person in whose custody the document is presently located, and whether any matter that is not privileged or not work product is discussed or mentioned in that document.

22. If any document requested was, but is no longer in the possession or subject to the control of the Trustee, or is no longer in existence, state whether it: (i) is missing or lost; (ii) has been destroyed; (iii) has been transferred, voluntarily or involuntarily, to others and state the identity of those persons to whom it has been transferred; (iv) has been otherwise disposed of, and in each instance, explain the circumstances surrounding such disposition, state the date or approximate date thereof, and the identity of the persons with knowledge of such circumstances; and (v) identify the documents that are missing, lost, destroyed, transferred, or otherwise disposed of, by author, date, subject matter, addressee and the number of pages.

23. If you do not clearly understand, or have any questions about, the definitions, instructions, or any request for documents, please contact counsel for Committee promptly for clarification.

24. As to any request that is claimed to be overbroad or to seek irrelevant documents, please indicate whether any responsive documents or subcategory of responsive documents are conceded to be discoverable and identify the documents or subcategory of documents that will be produced.

25. As to any request that is claimed to be unduly burdensome, expensive or oppressive or to which a similar objection is asserted, please provide the following information:

(i) the approximate number and/or volume of responsive documents; (ii) the location and manner in which the documents are maintained; (iii) any particular or unusual burden or effort required to produce the responsive documents; (iv) the estimated cost of producing responsive documents; and (v) any other facts on which you rely in support of your claim that production of responsive documents is unduly burdensome, costly or difficult.

26. Pursuant to Federal Rules of Civil Procedure 34, made applicable through Federal Rules of Bankruptcy Procedure 7034, all documents must be produced as they are kept in the usual course of business, including ESI, or must be organized and labeled to correspond to the categories of documents requested below. Each and every request for a document or documents to be produced requires production of the document, in its entirety, without abbreviation or expurgation.

27. Production of Documents in Electronic Format. As to all electronically stored information and Documents or communications existing in electronic format, including, but not limited to, electronic mail, please provide diskettes containing such data, CDR discs, or other portable storage media. *All Documents existing in electronic format shall be provided in their native format with accompanying metadata* (for example, but not by way of limitation, emails sent or received using Microsoft Outlook should be produced on CDR disc in ".PST" format).

28. Each request herein shall be deemed continuing so as to require prompt supplemental responses, to the extent required by the Federal Rules of Civil Procedure, if information called for herein is obtained, discovered or created subsequent to the time of responding to these requests.

29. This request covers all documents from April 5, 2010 to date, unless the specific request calls for a different time period.

SCHEDULE A

1. The Plan, Disclosure Statement, and Objection, including feasibility of the plan, projections, feasibility analysis, liquidation analysis, and analysis of the loan portfolio.
2. The loan portfolio of the Debtor.
3. The allegation that the Committee committed improper solicitation of the Plan.
4. The allegation that the Committee breached the Confidentiality Agreement.
5. The Trustee Fee Application and all attachments thereto.
6. The Accountant Fee Application and attachments thereto.

SCHEDULE B

DOCUMENTS TO BE PRODUCED

1. All documents which the Trustee and/or the Accountant intends to admit into evidence or rely upon at any hearing on approval (conditional or final) of the Disclosure Statement.
2. All documents which the Trustee and/or the Accountant intends to admit into evidence or rely upon at any hearing on the Accountant Fee Application and/or the Trustee Fee Application.
3. All documents which support the Trustee's allegations in the Objection relating to feasibility of the Plan.
4. All documents which support the Trustee's allegation in the Objection that the Plan is not in the best interest of creditors.
5. All communications between the Trustee and Accountant relating to feasibility of the Plan, including but not limited to any feasibility analysis, liquidation analysis, and analysis of the loan portfolio.
6. All documents relating to any analysis of the Debtor's loan portfolio.
7. All communications between the Trustee and Accountant relating to the Objection, Plan and Disclosure Statement.
8. Any communications between the Trustee and the Accountants which relates to the projections attached to the Disclosure Statement and/or feasibility.
9. All communications and documents which support the allegation that the Committee committed improper solicitation of the Plan.

10. All communications and documents which support the allegation that the Committee breached the Confidentiality Agreement.

11. All documents, including time sheets, correspondence, notes, records, invoices, worksheets, correspondence and billing statements, which evidence, support or relate to the work performed by the Trustee as set forth in the Trustee Fee Application and/or the Accountant Fee Application and attachments thereto.

12. All documents, including time sheets, correspondence, notes, records, invoices, worksheets, correspondence and billing statements which evidence, support or relate to the work performed by the Accountant as set forth in the Accountant Fee Application and/or the Trustee Fee Application and the attachments thereto.

13. All communications relating to the Accountant Fee Application and any objections thereto, including e-mail communications.

14. All communications relating to the Trustee Fee Application and any objections thereto, including e-mail communications.

15. If the Trustee intends to have expert testimony at the hearing on approval (conditional or final) of the Disclosure Statement, all documents which were relied on by that expert(s) in forming his or her opinion.

16. If the Trustee intends to have expert testimony at the hearing on approval (conditional or final) of the Disclosure Statement, all documents provided to the expert(s) who will testify on behalf of the Trustee and all correspondence with such expert and reports drafted by the expert.

17. If the Trustee intends to have expert testimony at the hearing on approval (conditional or final) of the Disclosure Statement, all documents which were referred to in any reports drafted by the expert(s) who will testify on behalf of the Trustee.

18. If the Trustee intends to have expert testimony at the hearing on approval (conditional or final) of the Disclosure Statement, all communications between the Accountant and the expert(s).