

Alan Cooper,

Plaintiff

v.

John Lawrence Steele, Prenda Law Inc., AF
Holdings, LLC, Ingenuity13, LLC,

Defendants

Court File No.:

Plaintiff's First Set of Interrogatories

TO: All Defendants.

Pursuant to Rules 26 and 33 of the Minnesota Rules of Civil Procedure, Plaintiff demands that you answer the following Interrogatories under oath within 30 days of the date these Interrogatories are served upon you. EACH DEFENDANT MUST SEPARATELY PROVIDE ANSWERS AND SIGN THEIR RESPONSES TO INTERROGATORIES.

INSTRUCTIONS

The following instructions are to be followed when answering these Interrogatories:

A. The Interrogatory or subpart thereof being answered shall be restated immediately preceding the answer to that Interrogatory or subpart thereof.

B. All factual information which is in the possession, custody or control of Defendants, their attorneys, agents, accountants, employees, or other representative, shall be divulged.

C. In answering these Interrogatories, furnish all information, however obtained, including hearsay, that is available to you and information known by or in possession of yourself, your agents, your attorneys, and your accountants, or appearing in your records.

D. If you cannot answer the following Interrogatories in full after exercising due diligence to secure the full information to do so, state an answer to the extent possible, specifying your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information. Any such documents you reviewed should be specifically identified in your answer.

E. A question that seeks information contained in, or information about, or identification of, any documents, may be answered by providing a copy of such document for inspection and copying or by furnishing a copy of such document without any further request for production.

F. "Identify," "identifying," and "identification" when referring to a person means to provide an identification sufficient to notice a deposition of such person and to serve such person with process to require his or her attendance at a place of examination and shall include, without limitation, his or her full name, present or last known address, present or last known business affiliation, home and business telephone number, title or occupation, each of his or her positions during the applicable period of time covered by any answer referring to such person and relationship, if any, to the agency.

G. "Identify," "identifying," and "identification" when used in reference to a writing or document mean to give a sufficient description of such writing or document to properly identify it in a request to produce and must include, without limitation, the following information for each such document:

1. The date appearing on such document, and if it has no date, the answer must state that fact clearly and give the date or approximate date such document was prepared;
2. The identity or descriptive code number, file number, title or label of such document;
3. The general nature and description of such document, and if it was not signed, the answer must state that fact clearly and give the name of the person or persons who prepared it;
4. The names of the person(s) to whom such document was addressed and the name of each person other than such addressee to whom such document or copies of it, were given or sent;
5. The name(s) of the person(s) having present possession, custody, or control of such document(s); and
6. Whether or not any draft, copy or reproduction of such document contains any postscripts, notations, changes or addendum not appearing on the document itself, and if so, the answer must give the description of each such draft, copy or reproduction.

DEFINITIONS

1. The terms "Plaintiff" means Alan Cooper.
2. The terms "Defendants" shall mean John Lawrence Steele, Prenda Law, Inc.; AF Holdings, LLC; and Ingenuity13, LLC.

INTERROGATORIES

1. Identify any persons you believe have personal knowledge of any facts relating to or arising out of the allegations, claims and defenses asserted in this lawsuit.
2. Identify any and all witnesses you expect to call to testify at the trial of this matter and summarize the expected content of their testimony.
3. Identify any and all exhibits you intend to introduce at the trial of this matter.
4. Identify each person you expect to call to testify as an expert witness at the trial of this matter. For each person identified,
 - a. State his area of expertise and the basis for that expertise.
 - b. List any articles, essays, papers, treatises or other writings authored wholly or partially by him.
 - c. State the subject matter about which the expert is expected to testify.
 - d. State in detail the substance of the facts and opinions to which the expert is expected to testify.
 - e. Provide a summary of the bases and individual grounds for each opinion to which the expert is expected to testify.
5. Identify all persons from whom you have obtained statements concerning any facts relating to or arising out of the allegations, claims and defenses asserted in this lawsuit and summarize the content and substance for any such statement.
6. Identify all communications between you and any entity or individual that regarding the allegations, claims, and defenses in this lawsuit. As to each communication, identify (a) the date of the communication (to the best of your recollection or records); (b) the type of communication (i.e., written or verbal); (c) if a conversation, all persons present during the conversation; and (d) the substance of the communication.

7. Identify and describe all communications between Defendant Steele and Plaintiff between 2006 and present.
8. Describe in detail any and all facts upon which you rely in alleging that Plaintiff is estopped from claiming damages against you.
9. Identify and describe any and all agreements, contracts, and payments between Defendants and Plaintiff
10. Identify and describe every officer, director, and member of AF Holdings, LLC from 2006 to present. For each person named, provide the dates that person had served in that position.
11. Identify and describe every officer, director, and member of Ingenuity13, LLC from 2006 to present. For each person named, provide the dates that person had served in that position.
12. Identify and describe any contracts, agreements, and payments between any two Defendants.
13. Identify and describe any notes, memoranda, or other documents created by Defendants or Defendants' representatives concerning the Plaintiff.
14. Identify the people who signed the document marked Exhibit A which is attached to the Complaint. For each person identified, provide a current mailing address, telephone number, and email address.
15. For each Request for Admission served upon you in which you either deny the allegations therein or provide a qualified response, please identify and provide all information known or available to you that supports your response.
16. Unless Request for Admission #31 is admitted in full, state in detail the basis for stating that any part of the letter dated November 29, 2012 is false.

17. Identify all people named Alan Cooper that Defendants have contacted or attempted to contact since November 1, 2012.
18. Identify all insurance policies held by Defendants and any claims submitted relating to this litigation.
19. Identify any and all social media accounts used by Defendants.

Dated: January 23, 2013

GODFREAD LAW FIRM, PC

By: 

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Attorney for Plaintiff, Alan Cooper