

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, S. number, and address): Brian A. Sun (State Bar No. 89410), Katherine E. Hertel (State Bar No. 208939)</p> <p>Jones Day 555 S. Flower St., 50th Floor Los Angeles, CA 90071</p> <p>TELEPHONE NO.: 213-489-3939 FAX NO. (Optional): 213-243-2539</p> <p>E-MAIL ADDRESS (Optional): <u>kehertel@jonesday.com</u></p> <p>ATTORNEY FOR (Name): Greenberg Glusker Fields Claman & Machtinger LLP, & Bertram Fields</p>	<p><i>FOR COURT USE ONLY</i></p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles</p> <p>STREET ADDRESS: 600 South Commonwealth Avenue</p> <p>MAILING ADDRESS:</p> <p>CITY AND ZIP CODE: Los Angeles, CA 90005</p> <p>BRANCH NAME: Central Civil West</p>	
<p>PLAINTIFF/PETITIONER: Bo Zenga</p> <p>DEFENDANT/RESPONDENT: City of Los Angeles, et. al.</p>	
<p>DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS</p>	
<p>CASE NUMBER: Lead Case No. BC 316318 (Zenga BC316459)</p>	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Daniel A. Saunders, Assistant U.S. Attorney Phone: (213) 824-2272
 United States Attorneys Office, 1500 United States Courthouse, 312 N. Spring Street, Los Angeles, California 90012


1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

<p>To (name of deposition officer): Jason M. Frank, Esq.</p> <p>On (date) : July 26, 2010</p> <p>Location (address): 450 Newport Center Drive, Second Floor, Newport Beach, CA 92660</p>	<p>At (time): 1:00 p.m.</p>
<p>Do not release the requested records to the deposition officer prior to the date and time stated above.</p>	

- a. by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows:
 Touhy Requests For Documents as set forth in Attachment A
- Continued on Attachment 3.
4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: May 26, 2010
 Katherine E. Hertel
(TYPE OR PRINT NAME)


(SIGNATURE OF PERSON ISSUING SUBPOENA)
 Attorney for Greenberg Glusker et al. & Bertram Fields
(TITLE)

(Proof of service on reverse)

EXHIBIT 13-00

PLAINTIFF/PETITIONER:	CASE NUMBER:
DEFENDANT/RESPONDENT:	

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) Witness fees were paid.
Amount:..... \$ _____

(2) Copying fees were paid.
Amount:..... \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. Not a registered California process server.
- b. California sheriff or marshal.
- c. Registered California process server.
- d. Employee or independent contractor of a registered California process server.
- e. Exempt from registration under Business and Professions Code section 22350(b).
- f. Registered professional photocopier.
- g. Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

Date:

▶ _____
(SIGNATURE)

▶ _____
(SIGNATURE)

CHART of Touhy Document Requests –
Requests for Documents

I. DEFINITIONS

As used in this chart of *Touhy* requests for documents, the following terms shall have the following meanings:

“Civil Cases” or “Civil Actions” shall mean the collateral civil proceedings entitled *In Re Pellicano* Cases pending before the Honorable Ann I. Jones in Los Angeles Superior Court (“LASC”), Lead Case No. BC316318, *McDougall, et al. v. Pellicano, et al.*, pending before the Honorable Richard Rico, LASC Case No. BC 381720, and *LaViolette v. Stevens*, pending before the Honorable Ralph W. Dau, LASC Case No. BC 410221 (“Civil Litigants”).

The *In Re Pellicano* Cases include:

- Anita Busch v. Pellicano, et al.*, (Lead Case), Case No. BC316318 (“the Busch Case”);
- Arthur Bernier v. Pellicano, et al.*, Case No. SC015056 (the “Bernier Case”);
- Keith Carradine, et al., v. Pellicano, et al.*, Case No. BC349590 (the “Carradine Case”);
- Doe v. Doe, et al.*, Case No. BC397071;
- Donna Dubrow v. Pellicano, et al.*, Case No. BC354840;
- Erin Finn v. Pacific Bell Tel. Co., et al.*, Case No. BC358271;
- Erin Finn v. Pfeifer, et al.*, Case No. BC388812;
- Michael Gerbosi v. Pacific Bell Tel. Co., et al.*, Case No. BC388664;
- Alex Kasper and Lee O. DuMond v. Pacific Bell Tel. Co., et al.*, Case No. BC358270 (the “Class Plaintiffs’ Case” or the “Kasper Action”);
- Lisa Bonder Kerkorian v. AT&T Corp., et al.*, Case No. BC350832;
- Stephen Kolodny v. Christensen, et al.*, Case No. BC356722;
- Robert Lobel, et al. v. Pacific Bell Tel. Co., et al.*, Case No. BC411180;
- Andrew Miller, et al. v. City of Los Angeles, et al.*, Case No. BC361319 (the “Miller Class Action”);
- Pamela Miller v. Thomson, et al.*, Case No. BC411218 (the “Pamela Miller Case”);
- Rein v. Pacific Bell Tel. Co., et al.*, Case No. BC410763;
- Michael Davis Sapir v. Tom Cruise, et al.*, Case No. BC428383 (the “Sapir Case”);
- Arni Shafir v. City of Beverly Hills, et al.*, Case No. BC361621;
- Deborah Simon v. AT&T Corp., et al.*, Case No. BC406589 (the “Simon Case”);
- Jeff M. Sturman v. AT&T Inc. et al.*, Case No. BC405674;
- Vincent “Bo” Zenga v. City of Los Angeles, et al.*, Case No. BC316459 (the “Zenga Case”);
- Monika Zsibrita v. Rock, et al.*, Case No. BC397071 (the “Zsibrita/Rock Case”); and
- Monika Zsibrita v. City of Los Angeles, et al.*, Case No. BC356529.

"Civil Litigants" shall mean the civil litigants in the Civil Cases or Civil Actions.

"Class Plaintiffs" shall mean Plaintiffs and class representatives Alex Kasper and Lee O. DuMond and all others similarly situated (*i.e.*, class members) in the civil proceeding entitled *Kasper, et al. v. Pacific Bell Tel. Co.*, Case No. BC3588270, one of the related, complex civil *In Re Pellicano Cases* currently pending before the Hon. Ann L. Jones, Central Civil West Courthouse, Los Angeles Superior Court (Lead Case Number BC 316318). Plaintiffs' claims arise from the illegal wiretapping and recording of thousands of telephone calls by criminal convict Anthony Pellicano and Defendant Pacific Bell Telephone Co., formerly operating as SBC Communications, Inc., by and through its former employees (including, without limitation, Rayford Turner, Michelle Malkin, Teresa Wright, and Joann Wigan), Plaintiffs' First Amended Complaint alleges the following causes of action: (a) violations of Cal. Penal Code sections 632 and 637.2; (b) Business & Professions Code sections 17200 et seq.; (c) invasion of privacy, (d) negligence, and (e) negligent supervision of Defendant Pacific Bell's employees. The Class is comprised of individuals who were not only the obvious "targets" of Pellicano's investigations, but those individuals whose calls were consequently illegally recorded by and through the conspiracy between Anthony Pellicano and former employees of Defendant Pacific Bell to unlawfully wiretap the telephone lines and illegally record the conversations of specific "targets." For example, Plaintiff Alexander Kasper's calls with Erin Finn were illegally recorded and his privacy invaded in the course of Pellicano's unlawful wiretapping of Ms. Finn's telephone lines, just as Plaintiff Lee O. DuMond's calls with her daughter, Hayley DuMond, were illegally recorded and her privacy invaded as a result of Pellicano's interception of both Keith Carradine's and Hayley DuMond's telephone lines.

"Communications" shall mean and includes all forms of written, oral (whether in person or by some remote means), visual or electronic communication (including e-mails) by, between or among persons.

"Computer Program" shall mean any set of ordered instructions to a computer to carry out a specific task and/or respond to user input and shall include binary executable and source code formats.

"Criminal Case" or "Criminal Actor" shall mean *United States of America v. Anthony Pellicano, et al.*, CR No. 05-01046-DSF before the Honorable Dale S. Fischer and shall include the federal criminal trial against Anthony Pellicano, Mark Arneson, Rayford Earl Turner, Kevin Kachikian, and Abner Nicherie and the severed federal criminal trial against Terry Christensen and Anthony Pellicano.

"Document" or "Writing" shall mean the broadest form of tangible expression as set forth in California Evidence Code Section 250, and shall include, without limitation, any paper, note, memorandum, letter, photograph, graphic and/or digital image, drawing, spreadsheet, accounting record, e-mail, or computer or digital file, whether in tangible form or on a computer or similar device (e.g.: hard disk, optical disk, tape drive or backup, diskette, in a file stored or saved on the internet, in a server operated by the Government or someone else, or other medium).

"Government" shall mean the United States Department of Justice, including the United States Attorney's Office, and any and all persons, agents, attorneys, representatives, and entities acting for or on its behalf, and the Federal Bureau of Investigation ("FBI") and any and all persons, agents, attorneys, representatives, and entities acting for or on its behalf.

“Pellicano” shall mean Anthony Pellicano, including any business entity operated and/or controlled by Anthony Pellicano, and its/their officers, employees, and/or agents, including Pellicano Investigative Services.

“Person” or “Persons” shall mean any natural person, partnership, joint venture, cooperative or unincorporated association, public or private corporation, public entity or other entity, or any past or present affiliate, officer, director, employee, agent, representative or attorney of any of the foregoing.

“Plaintiffs” shall mean all plaintiffs, class representatives, and class members, in the related, complex civil proceedings entitled *In Re Pellicano Cases* currently pending before the Hon. Ann I. Jones, Central Civil West Courthouse, Los Angeles Superior Court (Lead Case Number BC 316318), *McDougall, et al. v. Pellicano, et al.*, pending before the Honorable Richard Rico, LASC Case No. BC 381720, and *LaViolette v. Stevens*, pending before the Honorable Ralph W. Dau, LASC Case No. BC 410221 (“Civil Litigants”) and in federal court.

“Requesting Parties” shall mean only those Civil Litigants listed in the “Requesting Parties” column in the particular request.

“You” or “Your” shall mean the United States Department of Justice, including the United States Attorney’s Office, and any and all Persons, agents, attorneys, representatives, and entities acting for or on its behalf, and the Federal Bureau of Investigation (“F.B.I.”) and any and all Persons, agents, attorneys, representatives, and entities acting for or on its behalf.

B. SPECIFIC CIVIL LITIGANTS

As used in this chart of *Touhy* requests for documents, the following Civil Litigants shall be referenced as follows:

Bertram Fields – (“Fields”)

Christensen, Glaser, Fink, Jacobs, Weil & Shapiro, LLP – (the “Christensen Firm”)

Terry Christensen and Glaser, Fink, Jacobs, Weil & Shapiro, LLP – (collectively the “Christensen Defendants”)

Gorry Meyer & Rudd – (“GMR”)

Greenberg Glusker Fields Claman & Machtinger LLP – (“Greenberg Glusker”)

Pacific Bell Tel. Co. (d/b/a AT&T Tel. Co.; formerly SBC Communications) – (“Pacific Bell”)

Plaintiffs Alex Kasper and Lee O. DuMond, individually and on behalf of all others similarly situated (*i.e.*, class members) in *Kasper, et al. v. Pacific Bell Tel. Co.*, Case No. BC358270 (collectively, “Class Plaintiffs”)

Wasser, Cooperman & Carter – (the "Wasser Firm")

Wasser, Dennis M. and Wasser, Cooperman & Carter – (collectively the "Wasser Defendants")

C. GENERAL OBJECTION

The lack of objection by any party to the production of a document(s) pursuant to the *Touhy* requests herein is not an admission by any party that the language of the request itself (including any statement of alleged relevance) is accurate in any way.

Pacific Bell Telephone Company ("Pacific Bell") objects to each and every request herein to the extent the requests call for the production of any Pacific Bell records or information which are covered by California Public Utilities Code Section 2891(a); such records and information can only be produced for the individuals who have signed written authorizations allowing for the release of such records and information pursuant to the Protective Order in the Civil Cases. These individuals include the following named plaintiffs in the Civil Cases: Busch, Anita; Carradine, Hayley Dumond (Fka Dumond, Hayley); Carradine, Keith; Dubrow, Donna; Dumond, Lee; Finn, Erin; Gerbosi, Michael; Gregg, Heidi; Kasperavicius, Alexis; Kerkorian, Lisa; Lobel, Leslie A.; Lobel, Robert A.; Miller, Andrew Vicent; Miller, Joyce A.; Miller, Pamela Wayne; Rein, Robert S.; Russo, Max; Shafrir, Ami; Zenga, Bo; And, Zsibrita, Monika. Pursuant to the Protective Order, such documents and information should be produced to Pacific Bell only. Pacific Bell will in turn produce the unredacted records to the named plaintiffs' appropriate counsel in accordance with the redaction protocols required by the Protective Order. Pacific Bell objects to the production of any other customer's records or information pursuant to California Public Utilities Code Section 2891(a).

D. CHART OF TOUHY REQUESTS FOR DOCUMENTS

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
1.	All Documents produced to the Civil Litigants in <i>Anita Busch v. Anthony Pellicano, et al.</i> Los Angeles Superior Court, Case No. BC316318, pertaining to the unlawful acts against Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
2.	All Documents obtained from the Civil Litigants in <i>Anita Busch v. Anthony Pellicano, et al.</i> Los Angeles Superior Court, Case No. BC316318 pertaining to the unlawful acts taken against Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
3.	All Documents obtained from Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
4.	All Documents provided to Anita Busch, including but not limited to recordings of telephone calls and investigative summaries.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
5.	All investigative summaries concerning Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
6.	All Documents, including handwritten notes, from which investigative summaries concerning Anita Busch were compiled.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
7.	All Documents evincing wiretapping of Anita Busch's phones.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
8.	All recordings of Anita Busch's telephone calls.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
9.	All transcripts of Anita Busch's recorded telephone calls.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
10.	All recordings of telephone calls regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
11.	All transcripts of telephone calls regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
12.	All Documents evincing threats made to Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
13.	All Documents evincing surveillance of Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
14.	All Documents evincing the "hacking" of Anita Busch's computer(s).	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
15.	All Documents that evince Michael Oviz hired Pellicano to conduct surveillance of Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
16.	All Documents that evince Michael Oviz hired Pellicano to threaten Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
17.	All Documents that evince Michael Oviz hired Pellicano to wiretap Anita Busch's telephone(s).	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
18.	All Documents that evince Michael Oviz hired Pellicano to "hack" into Anita Busch's computer(s).	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
19.	All Documents that evince Michael Oviz hired Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
20.	All Documents that evince Michael Ovitiz spoke with Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
21.	All Documents that evince Michael Ovitiz hired Pellicano to do anything regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
22.	All Documents that evince Michael Ovitiz hired GMR to hire Pellicano to do anything regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
23.	All Documents that evince somebody hired Pellicano to take any action regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
24.	All Documents that evince anybody hired Pellicano to take any action regarding Anita Busch.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
25.	All Documents that evince Pellicano took it upon himself to investigate and/or harass people in an effort to obtain business.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
26.	All Documents that evince Pellicano took it upon himself to investigate and/or harass people in an effort to obtain business, excluding those Documents protected by the grand jury secrecy rule, F.R.C.P., Rule 6.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
27.	All Documents that evince Pellicano took it upon himself to investigate and/or harass Anita Busch in an effort to obtain business from Michael Ovitz.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
28.	All Documents, including investigative summaries created from interview(s) of Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
29.	All Documents produced by	The Government is the only source of the requested information and documentation	GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Pellicano.	and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Ovitz, Michael		
30.	All Documents produced to Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
31.	All Documents, including investigative summaries created from interview(s) of people who worked for Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
32.	All Documents produced by people who worked for Pellicano.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
33.	All Documents produced to people who worked for Pellicano.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
34.	All Documents, including investigative summaries created from interview(s) of Tarita Virtue.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
35.	All Documents produced by Tarita Virtue.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
36.	All Documents produced to Tarita Virtue.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
37.	All Documents, including investigative summaries created from interview(s) of	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Denise Ward.	source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
38.	All Documents produced by Denise Ward.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
39.	All Documents produced to Denise Ward.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
40.	All Documents, including investigative summaries created from interview(s) of Lily LeMasters.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
41.	All Documents produced by Lily LeMasters.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
42.	All Documents produced to Lily LeMasters.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
43.	All Documents, including investigative summaries created from interview(s) of Gaye Lynn Palazzos.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
44.	All Documents produced by Gaye Lynn Palazzos.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
45.	All Documents produced to Gaye Lynn Palazzos.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
46.	All Documents, including investigative summaries created from interview(s) of Mary Grace Spratlin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
47.	All Documents produced by Mary Grace Spratlin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
48.	All Documents produced to Mary Grace Spratin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
49.	All Documents, including investigative summaries created from interview(s) of Esther Finley.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
50.	All Documents produced by Esther Finley.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
51.	All Documents produced to Esther Finley.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
52.	All Documents, including investigative summaries created from interview(s) of Richard Campau.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
53.	All Documents produced by Richard Campau.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
54.	All Documents produced to Richard Campau.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
55.	All Documents, including investigative summaries created from interview(s) of Laura Sanchez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
56.	All Documents produced by Laura Sanchez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
57.	All Documents produced to Laura Sanchez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
58.	All Documents, including investigative summaries created from interview(s) of Kathy Kenicke.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
59.	All Documents produced by Kathy Kenicke.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
60.	All Documents produced to Kathy Kenicke.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
61.	All Documents, including investigative summaries created from interview(s) of Kevin Kachikian.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
62.	All Documents produced by Kevin Kachikian.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
63.	All Documents produced to Kevin Kachikian.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
64.	All Documents, including investigative summaries, created from interview(s) of Patricia Perez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
65.	All Documents produced by Patricia Perez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
66.	All Documents produced to Patricia Perez.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
67.	All Documents, including investigative summaries, created from interview(s) of	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Linda Bottlik.	source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
68.	All Documents produced by Linda Bottlik.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
69.	All Documents produced to Linda Bottlik.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Oviz, Michael		
70.	All Documents, including investigative summaries, created from interview(s) of Heather Deaton.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Oviz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
71.	All Documents produced by Heather Deaton.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
72.	All Documents produced to Heather Deaton.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
73.	All Documents, including investigative summaries, created from interview(s) of Emma Burgess.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
74.	All Documents produced by Emma Burgess.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
75.	All Documents produced to Emma Burgess.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
76.	All Documents, including investigative summaries, created from interview(s) of Diane Dean.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
77.	All Documents produced by Diane Dean.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
78.	All Documents produced to Diane Dean.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
79.	All Documents, including investigative summaries, created from interview(s) of Patrick Coffin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
80.	All Documents produced by Patrick Coffin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
81.	All Documents produced to Patrick Coffin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
82.	All Documents, including investigative summaries, created from interview(s) of Wayne Chin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
83.	All Documents produced by Wayne Chin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
84.	All Documents produced to Wayne Chin.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
85.	All Documents, including investigative summaries, created from interview(s) of Wayne Reynolds.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
86.	All Documents produced by Wayne Reynolds.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
87.	All Documents produced to Wayne Reynolds.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
88.	All Documents, including investigative summaries, created from interview(s) of Stacey Joiner.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
89.	All Documents produced by Stacey Joiner.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
90.	All Documents produced to Stacey Joiner.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
91.	All Documents, including investigative summaries, created from interview(s) of Aaron Messman.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
92.	All Documents produced by Aaron Messman.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
93.	All Documents produced to Aaron Messman.	This request seeks information from employee(s) of Pellicano, defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
94.	All Documents, including investigative summaries, created from interview(s) of Ned Zeman.	Ned Zeman was a contributing editor for Vanity Fair. In August 2002, just two months after the June 20, 2002 incident involving Busch's car, Zeman was reportedly threatened in a manner similar to Busch. At the time, the press, Busch and Stanley Ornellas asserted that this incident might be related to the incident involving Busch, because Zeman was writing about Steven Seagal and Jules Nasso at the time. The Government is the only source of the requested information and documentation and such requested bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
95.	All Documents produced by Ned Zeman.	Ned Zeman was a contributing editor for Vanity Fair. In August 2002, just two months after the June 20, 2002 incident involving Busch's car, Zeman was reportedly threatened in a manner similar to Busch. At the time, the press, Busch and Stanley Ornellas asserted that this incident might be related to the incident involving Busch, because Zeman was writing about Steven Seagal and Jules Nasso at the time. The Government is the only source of the requested information and documentation and such requested	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
96.	All Documents produced to Ned Zeman.	Information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
97.	All Documents, including investigative summaries, created from interview(s) of Michael Ovitz.	Ned Zeman was a contributing editor for Vanity Fair. In August 2002, just two months after the June 20, 2002 incident involving Busch's car, Zeman was reportedly threatened in a manner similar to Busch. At the time, the press, Busch and Stanley Ornellas asserted that this incident might be related to the incident involving Busch, because Zeman was writing about Steven Seagal and Jules Nasso at the time. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
98.	All Documents produced by Michael Ovitz.	Michael Ovitz is a defendant in the Busch Case. GMR is also a defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
99.	All Documents produced to Michael Ovitz.	Michael Ovitz is a defendant in the Busch Case. GMR is also a defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
100.	All Documents, including investigative summaries, created from interview(s) of employees/independent contractors/principals of Artists Management Group.	Reportedly, Artists Management Group was Ovitz's company on which Busch was reporting and/or investigating when she was investigated and threatened; Busch asserts the acts against her were in retaliation for these articles. Ovitz is a defendant in the action Busch Case. GMR is also a defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
101.	All Documents produced by employees/independent contractors/principals of Artists Management Group.	the allegations in the Busch Case.	GMR Ovitz, Michael		
102.	All Documents produced to employees/independent contractors/principals of Artists Management Group.	Reportedly, Artists Management Group was Ovitz's company on which Busch was reporting and/or investigating when she was investigated and threatened; Busch asserts the acts against her were in retaliation for these articles. Ovitz is a defendant in the action Busch Case. GMR is also a defendant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
103.	All Documents, including investigative summaries, created from interview(s) of Steven Seagal.	Busch at one time asserted that the incidents involving her that were at issue in the Criminal Case and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have investigated Seagal's potential links. Statements made by Seagal, including but not limited to those regarding Pellicano, Busch, Ned Zeman, Ovitz or any of the activities at issue in the Criminal Case are thus directly relevant to this litigation. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
104.	All Documents produced by Steven Seagal.	Busch at one time asserted that the incidents involving her that were at issue in the Criminal Case and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>investigated Seagal's potential links. Statements made by Seagal, including but not limited to those regarding Pellicano, Busch, Ned Zeman, Ovitz or any of the activities at issue in the Criminal Case are thus directly relevant to this litigation. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>			
105.	<p>All Documents produced to Steven Seagal.</p>	<p>Busch at one time asserted that the incidents involving her that were at issue in the Criminal Case and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have investigated Seagal's potential links. Statements made by Seagal, including but not limited to those regarding Pellicano, Busch, Ned Zeman, Ovitz or any of the activities at issue in the Criminal Case are thus directly relevant to this litigation. The Government is the only source of the requested information and documentation and such requested information and</p>	<p>GMR Ovitz, Michael</p>		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
106.	All Documents, including investigative summaries, created from interview(s) of Jules Nasso.	Busch at one time asserted that the incidents involving her that were at issue in the Criminal Case and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have investigated Nasso's potential links. Statements made by Nasso, including but not limited to those regarding Pellicano, Busch, Ned Zeman, Ovitz or any of the activities at issue in the federal criminal trial against Pellicano are thus directly relevant to this litigation. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
107.	All Documents produced by Jules Nasso.	Busch at one time asserted that the incidents involving her that were at issue in the Criminal Case and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal	GMR Ovitz, Michael		

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108.	All Documents produced to Jules Nasso.	<p>and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have investigated Nasso's potential links. Statements made by Nasso, including but not limited to those regarding Pellicano, Busch, Ned Zeman, Oviz or any of the activities at issue in the federal criminal trial against Pellicano are thus directly relevant to this litigation. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>	GMR Oviz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
109.	All Documents, including investigative summaries, created from interview(s) of Bert Fields.	Anita Busch has asserted that Bert Fields suggested to her that the June 20, 2002 incident might be related to her stories regarding Ovitz or AMG/APG. Fields has been known to have used Pellicano to assist with some cases, and on information and belief he was interviewed by the Government in this regard. Pellicano raised Fields' name in Ovitz's call to Pellicano of April 2002 (played at Federal criminal trial against Pellicano), whereby Ovitz testified he sought to obtain Pellicano's services. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
110.	All Documents produced by Bert Fields pertaining to Pellicano.	Anita Busch has asserted that Bert Fields suggested to her that the June 20, 2002 incident might be related to her stories	GMR Ovitz,	Grey, Brad Greenberg Glusker and	Grey, Greenberg Glusker, and Fields object to this request to the extent it calls for the production of documents

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>regarding Ovitz or AMG/APG. Fields has been known to have used Pellicano to assist with some cases, and on information and belief he was interviewed by the Government in this regard. Pellicano raised Fields' name in Ovitz's call to Pellicano of April 2002 (played at Federal criminal trial against Pellicano), whereby Ovitz testified he sought to obtain Pellicano's services. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>	Michael	Fields	<p>relating to Brad Grey, Greenberg Glusker, Fields, the Zenga case, or any other case relating to Grey, Greenberg Glusker, and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavaq, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Fields produced documents in response to grand jury</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Fields produced</p>

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					<p>documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960). Here, the Requesting Party states that "[t]he Government is the only source of the requested information." But clearly Fields would have these materials if he is the individual who produced the documents to the Government in response to grand jury subpoenas. To this date no Civil Litigant has propounded proper civil document requests on Fields for the materials the Requesting Party now seeks from the Government.</p> <p>Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
111.	All Documents produced by Bert Fields pertaining to Anita Busch.	Anita Busch has asserted that Bert Fields suggested to her that the June 20, 2002 incident might be related to her stories regarding Ovitz or AMG/APG. Fields has been known to have used Pellicano to assist with some cases, and on information and belief he was interviewed by the Government in this regard. Pellicano raised Fields' name in Ovitz's call to Pellicano of April 2002 (played at Federal criminal trial against Pellicano), whereby Ovitz testified he sought to obtain Pellicano's services. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael	Greenberg Glusker and Fields	Greenberg Glusker and Fields object to this request to the extent it calls for the production of documents relating to Greenberg Glusker, Fields, or any case relating to Greenberg Glusker and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i> , 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure, see <i>United States v. Dynavac, Inc.</i> , 6 F.3d 1407, 1415 (9th Cir. 1993); and (4) to the extent this

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>request is asking for information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.</p> <p>First, to the extent Fields produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Party is able to obtain the</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Fields produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(e). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas)</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>documents from Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them," and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (<i>quoting United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960)). Here, the Requesting Party states that "[t]he Government is the only source of the requested information." But clearly Fields would have these materials if he is the individual who produced the documents to the Government in response to grand jury subpoenas. To this date no Civil Litigant has propounded proper civil document requests on Fields for the materials the Requesting Party now seeks from the Government.</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
112.	All Documents produced to Bert Fields.	Anita Busch has asserted that Bert Fields suggested to her that the June 20, 2002 incident might be related to her stories regarding Ovitz or AMG/APG. Fields has been known to have used Pellicano to assist with some cases, and on information and belief he was interviewed by the Government in this regard. Pellicano raised Fields' name in Ovitz's call to Pellicano of April 2002 (played at Federal criminal trial against Pellicano), whereby Ovitz testified he sought to obtain Pellicano's services. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael	Greenberg Glusker and Fields	Fourth, Greenberg Glusker and Fields object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410. Such materials are not appropriate for disclosure under these rules.
113.	All Documents, including investigative summaries,	Bernard Weinraub co-authored all or almost all of the stories that Busch wrote	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	created from interview(s) of Bernard Weinraub.	about Oviz and the related company Artists Management Group ("AMG") in 2001 and 2002. Busch now claims that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Weinraub experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
114.	All Documents produced by Bernard Weinraub.	Bernard Weinraub co-authored all or almost all of the stories that Busch wrote about Oviz and the related company Artists Management Group ("AMG") in 2001 and 2002. Busch now claims that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Weinraub experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the	GMR Oviz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
115.	All Documents produced to Bernard Weinraub.	Bernard Weinraub co-authored all or almost all of the stories that Busch wrote about Ovitz and the related company Artists Management Group ("AMG") in 2001 and 2002. Busch now claims that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Weinraub experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
116.	All Documents, including investigative summaries, created from interview(s) of Paul Lieberman.	Paul Lieberman co-authored all or almost all of the stories that Busch wrote about Jules Nasso and Steven Seagal in June 2002. Busch originally claimed that the June 20, 2002 incident occurred in	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
117.	All Documents produced by Paul Lieberman.	<p>retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Lieberman experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>	GMR Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
118.	All Documents produced to Paul Lieberman.	Paul Lieberman co-authored all or almost all of the stories that Busch wrote about Jules Nasso and Steven Seagal in June 2002. Busch originally claimed that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Lieberman experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
119.	All Documents, including investigative summaries, created from interview(s) of Los Angeles Times personnel.	Anita Busch was working for the Los Angeles Times and reportedly writing about Jules Nasso and Steven Seagal in June 2002 when she was attacked and told to "stop". Busch originally claimed that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her employer, the Los Angeles Times, and any other information they may have that relates to the source of the June 20, 2002 incident or	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
120.	All Documents produced by Los Angeles Times personnel.	any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
121.	All Documents produced to Los Angeles Times	Anita Busch was working for the Los Angeles Times and reportedly writing about Jules Nasso and Steven Seagal in June 2002 when she was attacked and told to "stop". Busch originally claimed that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her employer, the Los Angeles Times, and any other information they may have that relates to the source of the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz,		

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	personnel.	about Jules Nasso and Steven Seagal in June 2002 when she was attacked and told to "stop". Busch originally claimed that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her employer, the Los Angeles Times, and any other information they may have that relates to the source of the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
122.	All Documents, including investigative summaries, created from interview(s) of New York Times personnel.	Anita Busch was working for the New York Times shortly before June 2002 when she was attacked and told to "stop". Busch was reportedly told by Bert Fields that the attacks may have been as a result of earlier articles she had worked on, leading her to reportedly believe that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her then employer, the New York Times, and any other information they may	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
123.	All Documents produced by New York Times personnel.	<p>have that relates to the source of the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p> <p>Anita Busch was working for the New York Times shortly before June 2002 when she was attacked and told to "stop". Busch was reportedly told by Bert Fields that the attacks may have been as a result of earlier articles she had worked on, leading her to reportedly believe that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her then employer, the New York Times, and any other information they may have that relates to the source of the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
124.	All Documents produced to New York Times personnel.	Anita Busch was working for the New York Times shortly before June 2002 when she was attacked and told to "stop". Busch was reportedly told by Bert Fields that the attacks may have been as a result of earlier articles she had worked on, leading her to reportedly believe that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to these or other stories she was working on for her then employer, the New York Times, and any other information they may have that relates to the source of the June 20, 2002 incident or any other incident involving Busch, is directly relevant. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
125.	All Documents, including investigative summaries, created from interview(s) of Ron Meyer.	At the federal criminal trial against Pellicano, Stanley Ornellas claimed that Ron Meyer had stated a personal belief that Michael Ovitz was somehow involved with Pellicano's legal difficulties. Similar assertions were reported in the press. Ovitz reportedly asked Pellicano to investigate Meyer along with Busch. The Government is the only source of the	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
126.	All Documents produced by Ron Meyer.	At the federal criminal trial against Pellicano, Stanley Ornellas claimed that Ron Meyer had stated a personal belief that Michael Ovitz was somehow involved with Pellicano's legal difficulties. Similar assertions were reported in the press. Ovitz reportedly asked Pellicano to investigate Meyer along with Busch. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
127.	All Documents produced to Ron Meyer.	At the federal criminal trial against Pellicano, Stanley Ornellas claimed that Ron Meyer had stated a personal belief that Michael Ovitz was somehow involved with Pellicano's legal difficulties. Similar assertions were reported in the press. Ovitz reportedly asked Pellicano to investigate Meyer along with Busch. The Government is the only source of the requested information and documentation and such requested information and	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
128.	All Documents, including investigative summaries, created from interview(s) of David Geffen.	At the federal criminal trial against Pellicano, Stan Ornellas, one of the investigators in charge of the criminal investigation, testified that David Geffen was one of the individuals that Pellicano was to investigate on behalf of Michael Ovitiz. On information and belief, in Ovitiz's call to Pellicano of April 2002 (played at the Federal criminal trial against Pellicano), Ovitiz testified he sought Pellicano's services regarding various people that he believed were causing him harm, including Geffen, Busch and others. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
129.	All Documents produced by David Geffen.	At the federal criminal trial against Pellicano, Stan Ornellas, one of the investigators in charge of the criminal investigation, testified that David Geffen was one of the individuals that Pellicano was to investigate on behalf of Michael Ovitiz. On information and belief, in Ovitiz's call to Pellicano of April 2002 (played at the	GMR Ovitiz, Michael		

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		Federal criminal trial against Pellicano), Ovitiz testified he sought Pellicano's services regarding various people that he believed were causing him harm, including Geffen, Busch and others. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.			
130.	All Documents produced to David Geffen.	At the federal criminal trial against Pellicano, Stan Ornellas, one of the investigators in charge of the criminal investigation, testified that David Geffen was one of the individuals that Pellicano was to investigate on behalf of Michael Ovitiz. On information and belief, in Ovitiz's call to Pellicano of April 2002 (played at the Federal criminal trial against Pellicano), Ovitiz testified he sought Pellicano's services regarding various people that he believed were causing him harm, including Geffen, Busch and others. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
131.	All Documents, including investigative summaries, created from interview(s) of Cathy Schulman.	Cathy Schulman has testified under oath in other proceedings that she was interviewed by the FBI about Michael Ovitz. Schulman reportedly told the FBI that Ovitz had confidential information about a December 2001 meeting of hers with Ron Meyer possibly obtained through Pellicano. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
132.	All Documents produced by Cathy Schulman.	Cathy Schulman has testified under oath in other proceedings that she was interviewed by the FBI about Michael Ovitz. Schulman reportedly told the FBI that Ovitz had confidential information about a December 2001 meeting of hers with Ron Meyer possibly obtained through Pellicano. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
133.	All Documents produced to	Cathy Schulman has testified under oath in other proceedings that she was	GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Cathy Schulman.	Interviewed by the FBI about Michael Ovitiz. Schulman reportedly told the FBI that Ovitiz had confidential information about a December 2001 meeting of hers with Ron Meyer possibly obtained through Pellicano. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Ovitiz, Michael		
134.	All Documents, including investigative summaries, created from interview(s) of Ron Burkle.	On information and belief, Ron Burkle claimed during his interview(s) with the FBI that Pellicano told him that Michael Ovitiz had hired Pellicano to obtain information about him [Burkle]. On information and belief, Burkle was asked questions about Ovitiz at his FBI interview(s). The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
135.	All Documents produced by Ron Burkle.	On information and belief, Ron Burkle claimed during his interview(s) with the FBI that Pellicano told him that Michael Ovitiz had hired Pellicano to obtain information about him [Burkle]. On information and	GMR Ovitiz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>belief, Burkle was asked questions about Ovitiz at his FBI interview(s). The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>			
136.	<p>All Documents produced to Ron Burkle.</p>	<p>On information and belief, Ron Burkle claimed during his interview(s) with the FBI that Pellicano told him that Michael Ovitiz had hired Pellicano to obtain information about him [Burkle]. On information and belief, Burkle was asked questions about Ovitiz at his FBI interview(s). The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>	<p>GMR Ovitiz, Michael</p>		
137.	<p>All Documents, including investigative summaries, created from interview(s) of Bryan Lourd.</p>	<p>At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Bryan Lourd on behalf of Michael Ovitiz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,</p>	<p>GMR Ovitiz, Michael</p>		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
138.	All Documents produced by Bryan Lourd.	At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Bryan Lourd on behalf of Michael Ovitz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
139.	All Documents produced to Bryan Lourd.	At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Bryan Lourd on behalf of Michael Ovitz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
140.	All Documents, including investigative summaries, created from interview(s) of	At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Kevin	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Kevin Huvane.	Huvane on behalf of Michael Ovitz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	Michael		
141.	All Documents produced by Kevin Huvane.	At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Kevin Huvane on behalf of Michael Ovitz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
142.	All Documents produced to Kevin Huvane.	At the federal criminal trial against Pellicano, assertions were made that Pellicano obtained information about Kevin Huvane on behalf of Michael Ovitz on August 10, 2001. Similar assertions were reported in the press. The Government is the only source of the requested information and documentation and such requested information and documents, if	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
143.	All Documents, including investigative summaries, created from interview(s) of Steven Bing.	Steven Bing is reported to have been a client of Pellicano who helped set up a meeting between Pellicano and Ron Burkle whom Pellicano was investigating on behalf of Michael Ovitz. Any statements he might have made to the Government regarding his contacts with Pellicano, Ovitz, Burke and others could, therefore, prove to be relevant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
144.	All Documents produced by Steven Bing.	Steven Bing is reported to have been a client of Pellicano who helped set up a meeting between Pellicano and Ron Burkle whom Pellicano was investigating on behalf of Michael Ovitz. Any statements he might have made to the Government regarding his contacts with Pellicano, Ovitz, Burke and others could, therefore, prove to be relevant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		documents, if they exist, bear directly on the allegations in the Busch Case.			
145.	All Documents produced to Steven Bing.	Steven Bing is reported to have been a client of Pellicano who helped set up a meeting between Pellicano and Ron Burkle whom Pellicano was investigating on behalf of Michael Ovitz. Any statements he might have made to the Government regarding his contacts with Pellicano, Ovitz, Burkle and others could, therefore, prove to be relevant in the Busch Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
146.	All Documents, including investigative summaries, created from interview(s) of Alexander Proctor.	Alexander Proctor is a defendant in the Busch Case and was a defendant in the Criminal Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
147.	All Documents produced by Alexander Proctor.	Alexander Proctor is a defendant in the Busch Case and was a defendant in the Criminal Case. The Government is the	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
148.	All Documents produced to Alexander Proctor.	Alexander Proctor is a defendant in the Busch Case and was a defendant in the Criminal Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
149.	All Documents, including investigative summaries, created from interview(s) of Mark Arneson.	Mark Arneson is a defendant in the action Busch Case and was a defendant in the Criminal Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
150.	All Documents produced by Mark Arneson.	Mark Arneson is a defendant in the action Busch Case and was a defendant in the Criminal Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist,	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		bear directly on the allegations in the Busch Case.			
151.	All Documents produced to Mark Arneson.	Mark Arneson is a defendant in the action Busch Case and was a defendant in the Criminal Case. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
152.	All Documents reflecting payments made to Pellicano from 1996 to 2004 by Michael Ovitz.	Michael Ovitz is a defendant in Busch Case who reportedly used the services of Pellicano on various occasions in the years preceding the attack on Anita Busch in 2002. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
153.	All Documents (which by definition includes all recordings) memorializing communications between Pellicano and each of the following: Bertram Fields; Etienne Ketcha; Mark	Michael Ovitz is a defendant in the Busch Case who reportedly talked to Pellicano repeatedly and used the services of Pellicano on various occasions in the years preceding the attack on Anita Busch in 2002. Bert Fields, one of Ovitz's lawyers, also hired Pellicano over the years, was	GMR Ovitz, Michael	Greenberg Glusker and Fields	Greenberg Glusker and Fields object to this request to the extent it calls for the production of documents Greenberg Glusker or any of its attorneys including Fields produced in response to grand jury subpoenas: (1) to the extent they reveal the substance of the grand jury

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Landesman; Michael Ovitz; Steven Seagal; Marty Singer.	mentioned in the April 2002 phone call from Ovitz to Pellicano, and reportedly instructed Busch to consider the subject of her earlier articles (e.g., Michael Ovitz) as behind the June 2002 attack on her. Busch at one time asserted that the 2002 incidents involving her were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Pellicano is reportedly well-acquainted with and has worked for Seagal. Marty Singer was Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Pellicano to assist with cases over the years. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.			investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i> , 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure, see <i>United States v. Dynavac, Inc.</i> , 6 F.3d 1407, 1415 (9th Cir. 1993); and (4) to the extent this request is asking for information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410. First, to the extent Greenberg Glusker or any of its attorneys including Fields

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, to the extent this request seeks communications produced by Fields or Greenberg Glusker or any of its attorneys, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>as such a court should not authorize any disclosure.</p> <p>Second, to the extent Greenberg Glusker or any of its attorneys including Fields produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas)</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Greenberg Glusker and/or Fields pursuant to authority provided in an applicable statute or</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960). Further, the Requesting Party states that "[t]he Government is the only source of the requested information." But if this request is seeking communications produced by Greenberg Glusker and/or Fields in response to grand jury subpoenas, Greenberg Glusker and/or Fields would also have these materials. Fourth, Greenberg Glusker and Fields object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
154.	All Documents (including recordings) memorializing communications by each of the following, including all reports and memoranda of interviews: Bertram Fields; Michael Oviz; Steven Seagal; Marty Singer.	Michael Oviz is a defendant in the Busch Case who reportedly talked to Pellicano repeatedly and used the services of Pellicano on various occasions in the years preceding the attack on Busch in 2002. Fields, one of Oviz's lawyers, also hired Pellicano over the years, was mentioned in the April 2002 phone call from Oviz to Pellicano, and reportedly instructed Busch to consider the subject of her earlier articles (e.g., Michael Oviz) as behind the June 2002 attack on her. Busch at one time asserted that the 2002 incidents involving her were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Pellicano is reportedly well-acquainted with and has worked for Seagal. Marty Singer was Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Pellicano to assist with cases over the years. The Government is the only source of the requested information and documentation and such requested information and	GMR Oviz, Michael	Greenberg and Fields	See objection to Request 153. 410. Such materials are not appropriate for disclosure under these rules.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
155.	All encrypted and unencrypted audio files in any medium not limited to digital or analog recordings, DVD, Compact Disc, cassette, micro-cassette, digital tape, and/or computer file), of telephone conversations by Pellicano involving or pertaining to the following people: Anita Busch, Bertram Fields, Michael Ovitz, Steven Seagal, Marty Singer, seized or otherwise obtained as part of the investigation or prosecution of any criminal defendant in the Criminal Action.	documents, if they exist, bear directly on the allegations in the Busch Case. Michael Ovitz is a defendant in the Busch Case who reportedly talked to Pellicano repeatedly and used the services of Pellicano on various occasions in the years preceding the attack on Busch in 2002. Fields, one of Ovitz's lawyers, also hired Pellicano over the years, was mentioned in the April 2002 phone call from Ovitz to Pellicano, and reportedly instructed Busch to consider the subject of her earlier articles (e.g., Ovitz) as behind the June 2002 attack on her. Busch at one time asserted that the 2002 incidents involving her were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Pellicano is reportedly well-acquainted with and has worked for Seagal. Marty Singer was Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Pellicano to assist with cases over the years. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
156.	<p>All transcriptions of audio recordings of telephone conversations of any person by Pellicano involving or pertaining to the following people: Anita Busch, Bertram Fields, Michael Ovitiz, Steven Seagal, Marty Singer either made or obtained by the Government as part of the investigation or prosecution of any criminal defendant in the Criminal Action.</p>	<p>Michael Ovitiz is a defendant in the Busch Case who reportedly talked to Pellicano repeatedly and used the services of Pellicano on various occasions in the years preceding the attack on Busch in 2002. Fields, one of Ovitiz's lawyers, also hired Pellicano over the years, was mentioned in the April 2002 phone call from Ovitiz to Pellicano, and reportedly instructed Busch to consider the subject of her earlier articles (e.g., Ovitiz) as behind the June 2002 attack on her. Busch at one time asserted that the 2002 incidents involving her were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Pellicano is reportedly well-acquainted with and has worked for Seagal. Marty Singer was Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Pellicano to assist with cases over the years.</p> <p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on</p>	<p>GMR Ovitiz, Michael</p>		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
157.	<p>All summaries of audio recordings of telephone conversations of any person by Pellicano involving or pertaining to the following people: Anita Busch, Bertram Fields, Michael Ovitiz, Steven Seagal, Marty Singer either made or obtained by the Government as part of the investigation or prosecution of any criminal defendant in the Criminal Action.</p>	<p>the allegations in the Busch action.</p> <p>Michael Ovitiz is a defendant in the Busch Case who reportedly talked to Pellicano repeatedly and used the services of Pellicano on various occasions in the years preceding the attack on Busch in 2002. Fields, one of Ovitiz's lawyers, also hired Pellicano over the years, was mentioned in the April 2002 phone call from Ovitiz to Pellicano, and reportedly instructed Busch to consider the subject of her earlier articles (e.g., Ovitiz) as behind the June 2002 attack on her. Busch at one time asserted that the 2002 incidents involving her were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Pellicano is reportedly well-acquainted with and has worked for Seagal. Marty Singer was Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Pellicano to assist with cases over the years.</p> <p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on</p>	<p>GMR Ovitiz, Michael</p>		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
158.	All unredacted trial exhibits introduced into evidence in the Criminal Action.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
159.	All Documents produced by the Government in discovery in the Criminal Action.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
160.	All Documents produced by Pellicano in discovery in the	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are	GMR Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Criminal Action.	defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Ovitz, Busch, and GMR.	Michael		
161.	All Documents produced by Pacific Bell Telephone Company dba AT&T and/or SBC Communications, pursuant to search warrants, subpoenas or any other requests or demands as part of the investigation or prosecution of the criminal defendant Pellicano in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in undated format.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		
162.	All Documents seized or taken from Pellicano by any law enforcement personnel pertaining or referring to Anita Busch.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC	GMR Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
163.	All Documents obtained by the Government pursuant to search warrants and subpoenas as part of the investigation or prosecution of criminal defendant Pellicano in the Criminal Action.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael	Grey, Brad Greenberg Glusker and Fields	Grey, Greenberg Glusker, and Fields object to this request to the extent it calls for the production of documents relating to Brad Grey, Greenberg Glusker, Fields, the Zenga case, or any other case relating to Grey, Greenberg Glusker, and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i> , 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Grey, Fields, Greenberg Glusker or any of its attorneys produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Further, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Grey, Fields and Greenberg Glusker or its attorneys produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Greenberg Glusker and Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them," and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960). Here, the Requesting Party states that "[t]he Government is the only source of the requested information." But clearly Greenberg Glusker and Fields would have materials they produced in response to grand jury subpoenas. To this date no Civil Litigant has propounded proper</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
164.	All Documents obtained by the Government pursuant to search warrants and subpoenas as part of the investigation or prosecution of any criminal defendant in the Criminal Action that pertains or relates to Anita Busch.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitz, Michael		civil document requests on Fields, Grey, and/or Greenberg Glusker or any of its attorneys for the materials the Requesting Party now seeks from the Government. For all of these reasons, the Government should deny the Requesting Party's request for these materials. Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
165.	All Documents evincing an actual or potential grant of immunity from criminal prosecution to any of the following in connection with the Criminal Action or any of the witnesses therein: Steven Seagal; Bert Fields; Michael Ovitiz	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitiz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
166.	All unsealed search warrants issued by the Government as part of the investigation and/or prosecution of any criminal defendant in the Criminal Action.	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Michael Ovitiz, Anita Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.	GMR Ovitiz, Michael		
167.	All subpoenas for records issued by the Government as part of the investigation or prosecution of any	Pellicano, Proctor and Arneson were defendants in the Criminal Case and are defendants, for the same acts, in the Busch Case. Other parties in the Busch	GMR Ovitiz, Michael	Greenberg Glusker and Fields	Greenberg Glusker and Fields object to this request to the extent it calls for the production of documents relating to Greenberg Glusker, Fields, or any case

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>criminal defendant in the Criminal Action.</p>	<p>Case are the City of Los Angeles, SBC Communications, Inc. (Pacific Bell, AT&T), Ovtz, Busch, and GMR. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the Busch Case.</p>			<p>relating to Greenberg Glusker and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Greenberg Glusker or any of its attorneys including Fields produced documents in response to grand jury subpoenas, these documents</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Further, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Greenberg Glusker or any of its attorneys including Fields produced documents that contain</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Greenberg Glusker or Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
168.	All FBI Witness Interview Memos (302s) and/or any other writings prepared by the Government regarding any investigation by the	The Christensen Defendants believe that number of unknown individuals have been interviewed by the Government regarding their knowledge of the alleged Leak investigation and that such documents will	Christensen		person producing them," and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (<i>quoting United States v. Interstate Dress Carriers, Inc.</i> , 280 F.2d 52, 54 (2nd Cir. 1960). Here, the Requesting Party states that "[t]he Government is the only source of the requested information." But clearly Greenberg Glusker and Fields would have materials they produced in response to grand jury subpoenas. To this date no Civil Litigant has propounded proper civil document requests on Fields and/or Greenberg Glusker or any of its attorneys for the materials the Requesting Party now seeks from the Government. For all of these reasons, the Government should deny the Requesting Party's request for these materials.

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
169.	<p>San Diego United States Attorney's Office (SDUSAO) of the alleged breaches of the Protective Order entered in the Criminal Case on April 3, 2006 (the "Leak Investigation").</p> <p>All audio or video recordings regarding interviews of the following individuals in connection with United States of America v. Pellicano, Case No: CR 05-1046; Ashman, Michael; Busch, Anita; Castelluccio, Frank; Chase, Gary; Dovej, Gregory; Edwards, Jeffrey; Ellis, Robert; Freihon, David; Gardiner, Mark Gasmer, Harlee; Gores, Alec; Gores, Lisa; Hart, Kenneth; Henry, Theresa; Kerkorian, Kirk; Koenig, Bruce; Kolodny, Stephen; Lemasters, Lily; Lin, Eugene Ted; Lopes, David; Lyle, Corrie; Mandles, Melanie; Manser, Daric; Mosser, Jonathan;</p>	<p>provide or may lead to the discovery of admissible evidence as to their knowledge and involvement, if any, regarding defenses to some or all causes of action of the Plaintiffs in each of the above referenced actions.</p> <p>Each of the above individuals testified at Christensen trial, and thus have information relevant to all civil cases related to alleged wiretapping of Lisa Bonder Kerkorian, including but not limited to the actions brought by Lisa Bonder Kerkorian, Stephen Kolodny, Robert Rein, Jeff Sturman, Robert and Leslie Lobel and Deborah Simon. The requested documents and things are solely in the possession of the Government.</p>	Pacific Bell		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Mosser, Jonathan; Nagler, Lawrence; Parra, Gregory; Pearce, Michael; Pfeifer, Robert Joseph; Rein, Robert; Rios, Elizabeth; Sager, Kelli Lee; Schmidt, Donald; Scholl, Stephen; Shillingford, Clifford; Simon, Deborah; Snyder, David; Snyder, David; Sturman, Jeffrey; Virtue, Tarita; Wolff, Nancy; Wood, Janice; Wright, Teresa Lynette</p>				
170.	<p>All audio or video recordings regarding interviews of the following individuals in connection with United States of America v. Pallicano, Case No. CR 05-1046: Buddine, Laura; Doe, Jane; Doucett, Linda; Dovel, Gregory; Edwards, Jeffrey Layne; Ellis, Robert; Father of Jane Doe Number 2; Finn, Erin; Green, Jude; Grey, Brad; Hart, Kenneth W.; Huvane, Kevin; Kerlin, Karla; Kim, Helen; Knecht, Peter L.;</p>	<p>Each of the above individuals testified at Christensen trial, and thus have information relevant to the wiretapping claim and issues civil cases, especially the claims brought by certain plaintiffs related to alleged wiretapping of Lisa Bonder Kerkorian. The requested documents and things are solely in the possession of the Government.</p>	Pacific Bell	Grey, Brad	<p>Grey objects to this request to the extent it calls for the production of documents relating to Brad Grey, the Zenga case, or any other case relating to Grey because they constitute confidential grand jury materials protected by Rule 6(e) of the Federal Rules of Criminal Procedure and thus cannot be released by the DOJ under the <i>Touhy</i> regulations. See 28 C.F.R. § 16.26. Witness interviews conducted in connection with a grand jury investigation constitute grand jury material for purposes of Rule 6(e) when they may reveal what occurred before</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>LeMasters, Lilly; Lopes, David; Lourd, Bryan William; Maguire, Susan; Manser, Daric; Millett, Patricia; Mueller, George; Neilsen, James P.; Parra, Gregory; Pearce, Michael; Pfeifer, Robert; Pfeifer, Robert Joseph; Rios, Elizabeth; Rosen, Charles Victor; Schuman, Steve; Shandling, Garry; Snyder, David J.; Virtue, Tarita; Westby, Julie Ann; Williams, Matthew Derrick</p>				<p>the grand jury. See, e.g., <i>In re Special February, 1975 Grand Jury</i>, 662 F.2d 1232, 1238 (7th Cir. 1981). The requested recordings memorialize interviews conducted as part of and pursuant to the grand jury's investigation, and the matters covered in both interviews were the subjects of the grand jury proceedings. Grey was subpoenaed to testify before the grand jury and appeared before the grand jury subsequent to his two interviews. The interviews focused on the same matters as Grey's testimony before the grand jury and were conducted in preparation and anticipation of Grey's subsequent appearances before the grand jury. Grey also believes that the summaries of his interviews were read to or summarized for the grand jury. Thus, these summaries constitute grand jury materials protected by Rule 6(e). See, e.g., <i>Martin v. Consultants & Administrators, Inc.</i>, 966 F.2d 1078, 1097 (7th Cir. 1992); <i>United States v. Armco Steel Corp.</i>, 458 F. Supp. 784, 790 (W.D. Mo. 1978). As such, the DOJ may not release recordings of Grey's interviews.</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>Moreover, Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Furthermore, Requesting Parties are able to obtain the same information through civil discovery – and in fact have already done so. Plaintiff Bo Zenga (“Zenga”) has propounded interrogatories and other discovery requests, and discovery is continuing. Zenga has deposed Grey for two full days and to date has received almost two thousand pages of documents relating to, among other things, the same issues for which Requesting Parties claim recordings of Grey’s interviews are required. Thus, there is no particularized need sufficient for court approval of disclosure of these recordings. See <i>McAhrinch v.</i></p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
171.	<p>All audio or video recordings regarding interviews of the following individuals in connection with United States of America v. Pellicano, Case No: CR 05-1046: Bernier, Arthur; Busch, Anita; Carradine, Keith; Dumond, Lee; Dubrow, Donna; Finn, Eini; Gebosi, Michael; Hugues, Mark; Kerkerian, Lisa; Kolodny, Stephen; Lobel, Leslie; Lobel, Robert; Miller, Andrew; Miller, Joyce; Russo, Maxwell; Russo, Samuel; Shafrir, Ami; Simon, Deborah; Sturman, Jeff M.; Tysman, Kissandra aka Cohen, Kissandra; Zenga, Bo; Zsibrita, Monika</p>	<p>Each of the above individuals is a plaintiff in the Pellicano civil cases (including federal proceedings pending before Hon. Dale S. Fischer), and thus prior statements by them are relevant to the wiretapping claims and various legal issues in the Pellicano civil cases, including but not limited to the statutes of limitations and damages. The requested documents and things are solely in the possession of the Government.</p> <p>Class Plaintiffs: The requested audio and video recordings of any interviews of individual plaintiffs in the In Re Pellicano Cases that were obtained in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording</p>	<p>Pacific Bell Plaintiffs Class Plaintiffs</p>	<p>John McTiernan</p>	<p><i>Wintermute</i>, 491 F.3d 759, 767-68 (8th Cir. 2007).</p> <p>McTiernan is currently a defendant in the following criminal proceeding: <i>United States of America v. John McTiernan</i>, Case No.: 2:06-CR-00259-DSF. Trial is set for July 13, 2010. Release of materials referencing McTiernan and/or Dubrow threatens to taint and/or improperly influence McTiernan's upcoming criminal trial, thereby violating McTiernan's Sixth Amendment right to a fair trial by an impartial jury. A criminal defendant has the right to a fair trial before a panel of impartial jurors. <i>Rose v. Clark</i> (1986) 478 U.S. 570. Furthermore, a jury may consider only the evidence produced at trial and a jury trial should be free from any suspicious taint by extraneous influences. Given the news media's coverage of the Pellicano cases, it is easily conceivable that the release of materials which reference or pertain to McTiernan and/or Dubrow could be reported in the press. If this occurs, it may improperly influence jurors or potential jurors in the upcoming trial. Accordingly, McTiernan objects to the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
172.	All audio or video	<p>of telephone conversations between any of the individual plaintiffs identified in the request and members of the Class are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Pacific Bell	John	<p>release of materials which reference or pertain to McTiernan and/or Dubrow. McTiernan further objects on the grounds that Title 28 of the Code of Federal Regulations, section 16.23, prohibits an attorney in the Department of Justice from releasing grand jury testimony, material, documents, or information secured by an attorney, or investigator of the Department of Justice, unless the attorney is satisfied that, with respect to any disclosure, the factors set forth in section 16.26(a)-(b) are satisfied. Here, the requested disclosure would violate, at a minimum, sections 16.26(a)-(b) in that the disclosure would potentially violate McTiernan's Sixth Amendment rights. Therefore, it cannot be said that the disclosure is "appropriate under the rules of procedure" or applicable statutory law. Additionally, disclosure would interfere with enforcement proceedings in that it could taint McTiernan's criminal trial. For all of the reasons stated, McTiernan objects to the release of materials which reference or pertain to McTiernan and/or Dubrow.</p> <p>McTiernan is currently a defendant in</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>recordings regarding interviews of the following individuals in connection with United States of America v. Pellicano, Case No: CR 05-1046: Ameson, Mark; Carradine, Sandra Will; Christenson, Terry; Fields, Bert; Grey, Brad; Hunt, William; Iannone, Marvin; Kachikian, Kevin; Kerkorian, Kirk; Malkin, Michelle; McTiernan, John; Moriarty, David; Ovitz, Michael S.; Pellicano, Anthony; Pfeifer, Robert; Proctor, Alexander; Rock, Chris; Sender, Adam; Stevens, Craig; Snowden, David; Turner, Rayford; Wasser, Dennis; Weil, Alan J.; Wright, Theresa</p>	<p>defendant in the Pellicano civil cases (including federal proceedings pending before Hon. Dale S. Fischer), and thus has information relevant to the wiretapping claims and issues in the civil cases, including joint tortfeasor issues. The requested documents and things are solely in the possession of the Government. Class Plaintiffs: The requested audio and video recordings of any interviews of individual defendants in the In Re Pellicano Cases that were obtained in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between the individual civil plaintiffs and members of the Class at the behest of the identified defendants in the request are highly relevant to Plaintiffs' statutory and common</p>	<p>Plaintiffs Class Plaintiffs</p>	<p>McTiernan Grey, Brad</p>	<p>the following criminal proceeding: <i>United States of America v. John McTiernan</i>, Case No.: 2:06-CR-00259-DSF. Trial is set for July 13, 2010. Release of materials referencing McTiernan threatens to taint and/or improperly influence McTiernan's upcoming criminal trial, thereby violating McTiernan's Sixth Amendment right to a fair trial by an impartial jury. A criminal defendant has the right to a fair trial before a panel of impartial jurors. <i>Rose v. Clark</i> (1986) 478 U.S. 570. Furthermore, a jury may consider only the evidence produced at trial and a jury trial should be free from any suspicious taint by extraneous influences. Given the news media's coverage of the Pellicano cases, it is easily conceivable that the release of materials which reference or pertain to McTiernan could be reported in the press. If this occurs, it may improperly influence jurors or potential jurors in the upcoming trial. Accordingly, McTiernan objects to the release of materials which reference or pertain to McTiernan and/or Dubrow. McTiernan further objects on the grounds that Title 28 of the Code of Federal Regulations, section 16.23,</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in <i>Kasper, et al. v. Pacific Bell Tel. Co.</i></p>			<p>prohibits an attorney in the Department of Justice from releasing grand jury testimony, material, documents, or information secured by an attorney, or investigator of the Department of Justice, unless the attorney is satisfied that, with respect to any disclosure, the factors set forth in section 16.26(a)-(b) are satisfied. Here, the requested disclosure would violate, at a minimum, sections 16.26(a)-(b) in that the disclosure would potentially violate McTiernan's Sixth Amendment rights. Therefore, it cannot be said that the disclosure is "appropriate under the rules of procedure" or applicable statutory law. Additionally, disclosure would interfere with enforcement proceedings in that it could taint McTiernan's criminal trial. For all of the reasons stated, McTiernan objects to the release of materials which reference or pertain to McTiernan.</p> <p>Grey objects to this request to the extent it calls for the production of documents relating to Brad Grey, the <i>Zenga</i> case, or any other case relating to Grey because they constitute confidential grand jury materials</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>protected by Rule 6(e) of the Federal Rules of Criminal Procedure and thus cannot be released by the DOJ under the <i>Touhy</i> regulations. See 28 C.F.R. § 16.26.</p> <p>Witness interviews conducted in connection with a grand jury investigation constitute grand jury material for purposes of Rule 6(e) when they may reveal what occurred before the grand jury. See, e.g., <i>In re Special February, 1975 Grand Jury</i>, 662 F.2d 1232, 1238 (7th Cir. 1981). The requested recordings memorialize interviews conducted as part of and pursuant to the grand jury's investigation, and the matters covered in both interviews were the subjects of the grand jury proceedings. Grey was subpoenaed to testify before the grand jury and appeared before the grand jury subsequent to his two interviews. The interviews focused on the same matters as Grey's testimony before the grand jury and were conducted in preparation and anticipation of Grey's subsequent appearances before the grand jury. Grey also believes that the summaries of his interviews were read to or</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>summarized for the grand jury. Thus, these summaries constitute grand jury materials protected by Rule 6(e). See, e.g., <i>Martin v. Consultants & Administrators, Inc.</i>, 966 F.2d 1078, 1097 (7th Cir. 1992); <i>United States v. Armco Steel Corp.</i>, 458 F. Supp. 784, 790 (W.D. Mo. 1978). As such, the DOJ may not release recordings of Grey's interviews.</p> <p>Moreover, Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Furthermore, Requesting Parties are able to obtain the same information through civil discovery – and in fact have already done so. Plaintiff Bo Zenga ("Zenga") has propounded interrogatories and</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
173.	All audio or video recordings regarding interviews of all employees of Pellicano or Pellicano-controlled entities in connection with United States of America v. Pellicano, Case. No: CR 05-1046	Employees of Mr. Pellicano would have information relevant to the wiretapping claims and issues in the civil cases, including liability, statutes of limitations, damages and joint tortfeasor issues. The requested documents and things are solely in the possession of the Government. Class Plaintiffs: The requested audio and video recordings of any interviews of former employees of Pellicano that were obtained in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical	Pacific Bell Plaintiffs Class Plaintiffs		other discovery requests, and discovery is continuing. Zenga has deposed Grey for two full days and to date has received almost two thousand pages of documents relating to, among other things, the same issues for which Requesting Parties claim recordings of Grey's interviews are required. Thus, there is no particularized need sufficient for court approval of disclosure of these recordings. See <i>McAinch v. Wintermute</i> , 491 F.3d 759, 767-68 (8th Cir. 2007).

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
174.	All computer and electronic files seized in any and all searches of the offices of Pellicano and any Pellicano-affiliated companies in connection with United States of America v. Pellicano, Case.	<p>Such documents and things are relevant to the wiretapping claims and issues in the civil cases, including liability, statutes of limitations, damages and joint tortfeasor issues. The requested documents and things are solely in the possession of the Government.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Pacific Bell Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
175.	Any subpoenas issued by the Government to Michael Ovitiz	<p>Class Plaintiffs The requested files and programs that were obtained by the Government in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning such unlawful wiretapping and/or recording are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Ovitiz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
			Ovitz, Michael		
176.	Any subpoenas issued by the Government to James Ellis	Mr. Ellis is counsel to Mr. Ovitz and to companies owned by Mr. Ovitz.	GMR Ovitz, Michael		
177.	Any subpoenas issued by the Government to Alexander Proctor	Mr. Proctor is a defendant in the Busch Case and was a defendant in the Criminal Case.	GMR Ovitz, Michael		
178.	Any subpoenas issued by the Government to Pellicano	Mr. Pellicano is a defendant in the Busch Case and was a defendant in the Criminal Case.	GMR Ovitz, Michael		
179.	Any subpoenas issued by the Government to Mark Arneson	Mr. Arneson is a defendant in the Busch Case and was a defendant in the Criminal Case.	Ovitz, Michael GMR		
180.	Any subpoenas issued by the Government to Immanuel Spira	Mr. Spira was an attorney at defendant GMR who on information and belief may have worked with Mr. Pellicano.	Ovitz, Michael GMR		
181.	Any subpoenas issued by the Government to Christopher Rudd	Mr. Rudd is a partner at defendant GMR who on information and belief may have been interviewed by the Government in connection with alleged hiring of Mr. Pellicano.	Ovitz, Michael GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
182.	Any subpoenas issued by the Government to Timothy Gorry	Mr. Gorry was a partner at defendant GMR who on information and belief may have been interviewed by the Government in connection with alleged hiring of Mr. Pellicano.	Ovitz, Michael GMR		
183.	Any subpoenas issued by the Government to Anita Busch	Ms. Busch is the plaintiff in the Busch Case. She is also the individual whose case began the investigation that led to the Criminal Case. She also at one time believed that the June 20, 2002 vandalism and other incidents involving her (at issue in both the federal criminal trial and in the current civil action) were related to stories she was writing regarding Steven Seagal and Jules Nasso. Any statements made by Ms. Busch relating to the events at issue in the Government's investigation are thus directly relevant to this litigation.	Ovitz, Michael GMR		
184.	Any subpoenas issued by the Government to Paul Lieberman	Mr. Lieberman co-authored all or almost all of the stories that Ms. Busch wrote about Messrs. Nasso and Seagal in June 2002. Ms. Busch originally claimed that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Mr. Lieberman experienced, and any other information he had or did not have about the June 20, 2002 incident or any other	Ovitz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
185.	Any subpoenas issued by the Government to Bernard Weinraub	Mr. Weinraub co-authored all or almost all of the stories that Ms. Busch wrote about Mr. Ovitz and the related company Artists Management Group ("AMG") in 2001 and 2002. Ms. Busch now claims that the June 20, 2002 incident occurred in retaliation for these stories. Thus, any evidence relating to any retaliation, or lack of retaliation, that Mr. Weinraub experienced, and any other information he had or did not have about the June 20, 2002 incident or any other incident involving Ms. Busch, is directly relevant.	Ovitz, Michael GMR		
186.	Any subpoenas issued by the Government to Steven Seagal	Ms. Busch at one time asserted that the 2002 incidents involving her that were at issue in the federal criminal trial and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. On information and belief, the Government at least investigated or claimed to have investigated Mr. Seagal's potential links. Any statements made by Mr. Seagal relating to Pellicano, Busch or any of the activities at issue in the federal criminal	Ovitz, Michael GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
187.	Any subpoenas issued by the Government to Jules Nasso	Ms. Busch at one time asserted that the 2002 incidents involving her that were at issue in the federal criminal trial and are at issue in her current civil case were related to stories she was writing regarding Steven Seagal and Jules Nasso, and she informed law enforcement of this suspicion. Any statements made by Mr. Nasso relating to Pellicano, Busch or any of the activities at issue in the federal criminal trial against Pellicano, or relating to his activities during the relevant period (2002 to 2003, which is that last date Ms. Busch claims any affirmative acts were taken against her) are thus directly relevant to this litigation.	Ovitz, Michael GMR		
188.	Any subpoenas issued by the Government to Martin Singer	Mr. Singer was Mr. Seagal's attorney. He was also among the individuals identified in articles as potentially hiring Mr. Pellicano to assist with cases over the years.	Ovitz, Michael GMR		
189.	Any subpoenas issued by the Government to Denise	Ms. Ward testified at the federal criminal trial. She stated that she was tasked with	Ovitz, Michael		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Ward	following Ms. Busch for several weeks in May and June of 2002. "Time sheets" evidencing her surveillance were also submitted into evidence at the federal criminal trial. Any statements by Ms. Ward regarding her work done in connection with the surveillance, and in connection with other work done for Mr. Pellicano is directly relevant to this litigation.	GMR		
190.	Any subpoenas issued by the Government to Daniel Patterson	On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. Thus, his information is directly relevant to the allegations in this case, which now seek to implicate Mr. Ovitz for the acts of which Mr. Seagal or others related to him were originally implicated.	Ovitz, Michael GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
191.	Any subpoenas issued by the Government to Tarita Virtue	<p>Ms. Virtue was a former employee of Mr. Pellicano and has testified regarding alleged phone "taps" and other alleged activities of Mr. Pellicano. Defendants in this civil matter have been sued for such alleged wiretaps allegedly conducted by Mr. Pellicano.</p> <p>Class Plaintiffs: The requested subpoenas issued to former Pellicano employee, Tarita Virtue, in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning subpoenas identifying materials requested by and possibly obtained and in the possession of the Government the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims</p>	Ovitz, Michael GMR Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
192.	Any subpoenas issued by the Government to Lily LeMasters	<p>as well as various legal issues including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p> <p>Ms. LeMasters was a former employee of Mr. Pellicano and has testified regarding alleged phone "taps" and other alleged activities of Mr. Pellicano. Defendants in this civil matter have been sued for such alleged wiretaps allegedly conducted by Mr. Pellicano.</p> <p>Class Plaintiffs: The requested subpoenas issued to former Pellicano employee, Lily LeMasters, in the course of the Government's investigation and prosecution of Pellicano and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or</p>	Ovitz, Michael GMR Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
193.	Any subpoenas issued by the Government to Rayford Earl Turner	<p>evidence concerning subpoenas identifying materials requested by and possibly obtained and in the possession of the Government the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Ovitz, Michael GMR Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
194.	Any subpoenas issued by the Government to Theresa Wright	<p>evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning subpoenas identifying materials requested by and possibly obtained and in the possession of the Government the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Ovitz, Michael GMR Plaintiffs		
		Reason for request: Ms. Wright is alleged to have assisted Mr. Pellicano to obtain access to telephone lines for the purpose of "tapping" phone conversations. Defendants in this civil matter have been			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>sued for such alleged wiretaps allegedly conducted by Mr. Pellicano.</p> <p>Class Plaintiffs: The requested subpoenas issued to former SBC Communications employee Teresa Wright in the course of the Government's investigation and prosecution of Pellicano, Ms. Wright, Rayford Turner and other criminal defendants are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning subpoenas identifying materials requested by and possibly obtained and in the possession of the Government the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials,</p>	Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
195.	Any subpoenas issued by the Government to Joann Wiggan	Reason for request: Ms. Wiggan is alleged to have assisted Mr. Pellicano to obtain access to telephone lines for the purpose of "tapping" phone conversations. Defendants in this civil matter have been sued for such alleged wiretaps allegedly conducted by Mr. Pellicano. Class Plaintiffs: The requested subpoenas issued to former SBC Communications employee Joann Wiggan in the course of the Government's investigation and prosecution of Pellicano, Teresa Wright, Rayford Turner, Ms. Wiggan and other criminal defendants, are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning subpoenas identifying materials requested by and possibly obtained and in the possession of the Government the course of its investigation	Ovitz, Michael GMR Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
196.	Any subpoenas issued by the Government to Ned Zeman	<p>and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Ovitz, Michael GMR		
197.	Any subpoenas issued by the Government to John Rotger	<p>Mr. Zeman was a contributing editor for Vanity Fair. In August 2002, just two months after the June 20, 2002 incident involving Ms. Busch's car, Mr. Zeman was reportedly threatened. At the time, the press, Ms. Busch and Stanley Ornellas asserted that this incident might be related to the incident involving Ms. Busch, because Mr. Zeman was writing about Mr. Seagal and Mr. Nasso at the time.</p>	Ovitz, Michael GMR		
198.	Any subpoenas issued by the Government to John	Mr. Rotger was identified by Mr. Ornellas in an affidavit as a suspect in the threat against Ned Zeman. Mr. Rotger is connected to Mr. Seagal.	Ovitz,		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Rottger, Jr.	against Ned Zeman. Mr. Rottger is connected to Mr. Seagal.	Michael GMR		
199.	Any subpoenas issued by the Government to William (Bill) McMullen	According to Stanley Ornellas, Mr. McMullen informed Ornellas of the potential involvement of John Rottger in the threat against Ned Zeman.	Ovitz, Michael GMR		
200.	Any subpoenas issued by the Government to Ron Meyer	At the federal criminal trial against Mr. Pellicano, Stanley Ornellas claimed that Mr. Meyer had stated a personal belief that Mr. Ovitz was somehow involved with Mr. Pellicano's legal difficulties. Similar assertions were reported in the press.	Ovitz, Michael GMR		
201.	Any subpoenas issued by the Government to Kevin Huwane	At the federal criminal trial against Mr. Pellicano, assertions were made that Mr. Pellicano obtained information about Mr. Huwane on behalf of Mr. Ovitz or AMG. Similar assertions were reported in the press.	Ovitz, Michael GMR		
202.	Any subpoenas issued by the Government to Bryan Lourd	At the federal criminal trial against Mr. Pellicano, assertions were made that Mr. Pellicano obtained information about Mr. Lourd on behalf of Mr. Ovitz or AMG. Similar assertions were reported in the press.	Ovitz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
203.	Any subpoenas issued by the Government to James Casey	At the federal criminal trial against Mr. Pellicano, assertions were made that Mr. Pellicano obtained information about Mr. Casey on behalf of Mr. Ovitz or AMG. Similar assertions were reported in the press.	Ovitz, Michael GMR		
204.	Any subpoenas issued by the Government to Arthur Bernier	At the federal criminal trial against Mr. Pellicano, assertions were made that Mr. Pellicano obtained information about Mr. Bernier on behalf of Mr. Ovitz or AMG. Similar assertions were reported in the press.	Ovitz, Michael GMR		
205.	Any subpoenas issued by the Government to Cathy Schulman	Ms. Schulman has testified under oath in other proceedings that she was interviewed by the FBI about Mr. Ovitz.	Ovitz, Michael GMR		
206.	Any subpoenas issued by the Government to Bert Fields	Ms. Busch has asserted that Mr. Fields suggested to her that the June 20, 2002 incident might be related to her stories regarding Mr. Ovitz or AMG/APG. Mr. Fields has been known to have used Mr. Pellicano to assist with some cases, and on information and belief he was interviewed by the Government in this regard.	Ovitz, Michael GMR		
207.	Any subpoenas issued by	Mr. Hornstein was a partner for Greenberg	Ovitz,		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	the Government to James Hornstein	Glusker, the same firm of which Mr. Fields is a partner. As noted above Ms. Busch has asserted that Mr. Hornstein's partner suggested to her that the June 20, 2002 incident might be related to her stories regarding Mr. Ovitz or AMG/APG. Greenberg has been known to have used Mr. Pellicano to assist with some cases, and on information and belief Mr. Hornstein may have been interviewed by the Government in this regard.	Michael GMR		
208.	Any subpoenas issued by the Government to David Geffen	At the federal criminal trial against Mr. Pellicano, Mr. Ornellas, one of the investigators in charge of the criminal investigation, testified that David Geffen was one of the individuals that Mr. Pellicano was to investigate on behalf of Mr. Ovitz.	Ovitz, Michael GMR		
209.	Any subpoenas issued by the Government to Ronald Burke	On information and belief, Mr. Burkle claimed during his interview(s) with the FBI that Mr. Pellicano told him Mr. Ovitz had hired Mr. Pellicano to obtain information about Mr. Burkle. On information and belief, Mr. Burkle was asked questions about Mr. Ovitz at his FBI interview(s).	Ovitz, Michael GMR		
210.	Any communications between the Government		Ovitz, Michael		

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	<p>and the attorneys and/or investigators for Jules Nasso (including but not limited to Barry Levin, Jack Litman, Andrew Catalan and/or William McMullen) in relation to either Jules Nasso or Steven Seagal, dated on or after June 20, 2002.</p>		GMR		
211.	<p>Any "time sheets" (similar to that identified as Prosecution Exhibits 606 to 608 in the federal criminal trial against Pellicano et al.) showing surveillance by anyone working for Mr. Pellicano, between the dates January 1, 2001 and November 17, 2003.</p>	<p>Ms. Busch has claimed overt actions against her from at least May (or sometime prior to May) 2002, and March 2003. Stanley Ornellas has claimed that Mr. Oviz sought assistance from Pellicano at least as early as 2001 in connection to other individuals. Thus, what Mr. Pellicano's employees or contractors were doing – or not doing – during that time period is directly relevant to this litigation. The November 17, 2003 end date was chosen out of an abundance of caution, as it appears certain that Mr. Pellicano's business activities ended by at least sometime in 2003, but currently it is unclear exactly what are the end dates in the materials obtained by the Government. November 17, 2003 is the date (on information and belief) that Mr. Pellicano</p>	Oviz, Michael GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
212.	Any notes or reports similar to those identified as Prosecution Exhibits P120, P129 and P130 in the Criminal Case showing information obtained by anyone working for Mr. Pellicano, between the dates January 1, 2001 and November 17, 2003.	Ms. Busch has claimed overt actions against her from at least May (or sometime prior to May) 2002, and March 2003. Stanley Ornelias has claimed that Mr. Ovitz sought assistance from Pellicano at least as early as 2001 in connection to other individuals. Thus, what Mr. Pellicano's employees or contractors were doing – or not doing – during that time period is directly relevant to this litigation. The November 17, 2003 end date was chosen out of an abundance of caution, as it appears certain that Mr. Pellicano's business activities ended by at least sometime in 2003, but currently it is unclear exactly what are the end dates in the materials obtained by the Government. November 17, 2003 is the date (on information and belief) that Mr. Pellicano began serving his sentence on explosives charges.	Ovitz, Michael GMR		
213.	The file and articles mentioned in the January 16, 2004 Los Angeles Times story located at http://articles.latimes.com/2004/jan/16	The existence of this file is directly relevant to the original theory of Ms. Busch, that the reason for the June 20, 2002 vandalism of her car was that she was writing and investigating a story about Steven Seagal	Ovitz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>004/jan/16/local/mepellicano16. Specifically, in describing the items seized in the FBI's search of Mr. Pellicano's premises, the story states: "Also seized, they said, was a separate file labeled 'Stephen Seagal matter' and containing an earlier article Busch had co-authored about the actor, as well as a Vanity Fair article about Seagal by writer Ned Zeman."</p>	<p>and Jules Nasso. Ms. Busch has now attempted to accuse Mr. Ovitiz of being behind that incident, and therefore any evidence relating to others who were or may have actually been responsible are directly relevant to Mr. Ovitiz' defense (as well as the defense of other defendants in this litigation).</p>			
214.	<p>Any recordings of Alexander Proctor.</p>	<p>On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's</p>	<p>Ovitiz, Michael GMR</p>		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
215.	Any transcripts of any recordings of Alexander Proctor.	<p>information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain leniency with respect to federal charges he faced at the time. Thus, not only are his communications regarding Mr. Proctor and Mr. Pellicano relevant to this case, any communications that reflect on Mr. Patterson's bias or motivations for providing such information to the Government are also relevant.</p> <p>On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain</p>	Ovitz, Michael GMR		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
216.	Any recordings of Daniel Patterson in or after 2001.	<p>On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain leniency with respect to federal charges he faced at the time. Thus, not only are his communications regarding Mr. Proctor and</p>	Ovitz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
217.	Any transcripts of any recordings of Daniel Patterson in or after 2001.	Mr. Pellicano relevant to this case, any communications that reflect on Mr. Patterson's bias or motivations for providing such information to the Government are also relevant.	Ovitz, Michael GMR		
		On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain leniency with respect to federal charges he faced at the time. Thus, not only are his communications regarding Mr. Proctor and Mr. Pellicano relevant to this case, any communications that reflect on Mr. Patterson's bias or motivations for			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
218.	Any communications with Daniel Patterson in or after 2001.	<p>On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain leniency with respect to federal charges he faced at the time. Thus, not only are his communications regarding Mr. Proctor and Mr. Pellicano relevant to this case, any communications that reflect on Mr. Patterson's bias or motivations for providing such information to the Government are also relevant.</p>	Ovitz, Michael GMR		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
219.	Any notes of communications with Daniel Patterson in or after 2001.	On information and belief, Mr. Patterson is the individual identified as "CW" in the affidavit submitted by the Government in order to obtain a search warrant of Mr. Pellicano's premises. CW allegedly contacted Ms. Busch to tell her who had purportedly committed the June 20, 2002 act of vandalism on her car. He is also identified as the individual who implicated Mr. Proctor and who participated in recordings in which Mr. Proctor implicated Mr. Pellicano and Mr. Seagal and/or "people back east" supposedly connected to Mr. Seagal. There have been claims made in court papers that Mr. Patterson's information may have been obtained by him – and possibly manufactured or manipulated by him – in order to obtain leniency with respect to federal charges he faced at the time. Thus, not only are his communications regarding Mr. Proctor and Mr. Pellicano relevant to this case, any communications that reflect on Mr. Patterson's bias or motivations for providing such information to the Government are also relevant.	Ovitz, Michael GMR		
220.	Any recording of conversations between Ron Meyer and Pellicano,		Ovitz, Michael		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	including the conversation identified at the federal criminal trial by Stanley Ornellas (Friday, April 18, 2008, Volume 26, page 90).		GMR		
221.	Any transcript of or notes from any conversations between Ron Meyer and Pellicano, including the conversation identified at the federal criminal trial by Stanley Ornellas (Friday, April 18, 2008, Volume 26, page 90).		Ovitz, Michael GMR		
222.	All COMPUTER PROGRAMS in electronic format, including but not limited to binary executables and source code for all TeleSleuth programs seized or otherwise obtained by You.	The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested computer programs are critical evidence to Plaintiffs	Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
223.	All Documents, including but not limited to examination notes and report(s) prepared by Jeff Edwards, Forensic Audio	The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and/or illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, related information or evidence concerning the means of such unlawful wiretapping or recording of Plaintiffs' telephone conversations, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.	Plaintiffs Class. Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Video & Image Analysis Unit (FAV/IAU), regarding the reverse engineering and decryption of the Telesleuth programs.</p>	<p>engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents prepared by Jeff Edwards (FAV/IAU) regarding the reverse engineering and decryption of the Telesleuth programs are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and/or illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the means of unlawful wiretapping and recording of Plaintiffs' telephone conversations, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
224.	All Documents, including but not limited to examination notes and report(s) associated with any testing performed by other FBI forensic units regarding the (non-cryptographic) capabilities of the Telesleuth programs.	The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in <i>Kasper, et al. v. Pacific Bell Tel. Co.</i> including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in <i>Kasper, et al. v. Pacific Bell Tel. Co.</i>	Plaintiffs Class Plaintiffs		
		The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents associated with any other testing performed by any other FBI forensic units regarding the non-cryptographic capabilities of the Telesleuth programs are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel Co. unlawfully engaged in a			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
225.	All Documents, including but not limited to examination report(s), produced by expert witness BEKTEK that were submitted into evidence	<p>common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dummond, any related information or evidence concerning the means of unlawful wiretapping and recording of Plaintiffs' telephone conversations, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>during the second criminal trial of Terry Christensen.</p>	<p>wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested expert documents are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the means of unlawful wiretapping and recording of Plaintiffs' telephone conversations, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials,</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
226.	All CodeWarrior project files, build and/or compilation instructions, and scripts for compiling the Telesleuth source code into binary executables.	<p>should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p> <p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Such materials likely contain direct evidence of illegal wiretapping of many of the civil plaintiffs and putative class members, as well as other wrongful acts against many of the civil plaintiffs by the civil defendants in the collateral civil proceedings.</p> <p>Class Plaintiffs: The requested CodeWarrior project files, build and/or compilation instructions, and scripts for compiling the Telesleuth source code into binary executables are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co.</p>	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
227.	All unencrypted or unencrypted audio recordings in any medium (including, but not limited to digital or analog recordings, DVD, Compact Disc, cassette, micro-cassette, digital tape, and/or	<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably</p> <p>unlawfully engaged in common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the means of unlawful wiretapping and recording of Plaintiffs' telephone conversations, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>computer file), of telephone conversations by Pellicano seized or otherwise obtained by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF.</p>	<p>calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Such materials likely contain direct evidence of illegal wiretapping of many of the civil plaintiffs and putative class members, as well as other wrongful acts against many of the civil plaintiffs by the civil defendants in the collateral civil proceedings.</p> <p>Class Plaintiffs: The requested audio recordings are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the actual audio recordings of telephone conversations of Plaintiffs Alex Kasper, Lee O. Dumond and any member the Class, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
228.	<p>All transcriptions of audio recordings of telephone conversations of any Person by Pellicano either made or obtained by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.</p>	<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Such materials likely contain direct evidence of illegal wiretapping of many of the civil plaintiffs and putative class members, as well as other wrongful acts against many of the civil plaintiffs by the civil defendants in the collateral civil proceedings.</p> <p>Class Plaintiffs: The requested transcriptions of audio recordings are</p>	<p>Plaintiffs Class Plaintiffs</p>	<p>Kerkorian, Kirk</p>	<p>Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
229.	All summaries of audio recordings of telephone conversations of any	<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations they exist, bear directly on the allegations</p>	Plaintiffs Class	Kerkorian, Kirk	Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Person by Pellicano either made or obtained by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.</p>	<p>made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Such materials likely contain direct evidence of illegal wiretapping of many of the civil plaintiffs and putative class members, as well as other wrongful acts against many of the civil plaintiffs by the civil defendants in the collateral civil proceedings.</p> <p>Class Plaintiffs: The requested transcriptions of audio recordings are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the summaries of telephone conversations of Plaintiffs Alex Kasper, Lee O. Dumond and any member the</p>	<p>Plaintiffs</p>		<p>of documents reflecting communications between Pellicano and Terry Christensen.</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
230.	All unredacted trial exhibits introduced into evidence in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF.	<p>Class, that were prepared or obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs	Kerkorian, Kirk	Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.
		<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested unredacted versions of all trial exhibits are critical</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped individuals and the summaries and transcriptions of unlawfully recorded telephone conversations of Erin Finn with Plaintiff Alex Kasper, Lee O. DuMond with Hayley DuMond, and of conversations involving any member the Class, that were prepared or obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, and submitted into evidence in the trial are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
231.	<p>All Documents produced by Pacific Bell Telephone Company d/b/a AT&T and/or SBC Communications, pursuant to search warrants, subpoenas or any other requests or demands by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints against Pacific Bell Telephone Company d/b/a AT&T and/or SBC Communications that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs through former telephone company employees, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Such materials likely contain direct evidence of illegal wiretapping of many of the civil plaintiffs and putative class members, as well as other wrongful acts against many of the civil plaintiffs by the civil defendants in the collateral civil proceedings.</p> <p>Class Plaintiffs: The requested business records and documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally</p>	<p>Plaintiffs Class Plaintiffs</p>		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
232.	All Documents seized or taken from Pellicano by You	<p>record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting telephone conversations of Erin Finn with Plaintiff Alex Kasper, Lee O. DuMond with Hayley DuMond, and the illegal recording of telephone conversations of any member the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs	Kerkorian,	Kerkorian objects to this request on the grounds of the attorney-client privilege

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>or other law enforcement personnel pertaining or referring to Anita Busch.</p>	<p>they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents pertaining to Anita Busch are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning he illegal recording of telephone conversations between Anita Busch and any member the Class, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory</p>	<p>Class Plaintiffs</p>	<p>Kirk</p>	<p>to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
233.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Erin Finn, Robert Pfeifer, Alan J. Weil, .	<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/Invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as</p>	Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
234.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Alexander Kasper.	<p>Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations of Erin Finn and Plaintiff Alex Kasper, or Erin Finn and any member the Class, obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents pertaining to Plaintiff Alex Kasper (aka Alexis Kasperavicius) are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between Plaintiff Erin Finn and Plaintiff Alex Kasper obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
235.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Hayley DuMond.	The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents pertaining to Hayley DuMond are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between Hayley DuMond and her mother, Plaintiff Lee O. DuMond, or between Hayley DuMond and any other member of the Class, that were obtained by the Government in the course	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
236.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Lee O. DuMond.	<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		
		<p>The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents pertaining to Plaintiff Lee O. DuMond are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
237.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or	<p>behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dummond, any related information or evidence concerning the illegal recording of telephone conversations between Plaintiff Lee O. Dummond and her daughter, Hayley Dummond, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs	Kerkorian, Kirk	Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	referring to Lisa Kerkorian.	<p>engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents pertaining to Lisa Kerkorian are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence the illegal recording of telephone conversations between Lisa Kerkorian and any member of the Class that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p>			Terry Christensen.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
238.	All Documents seized or taken from Pallicano by You or other law enforcement personnel pertaining or referring to Monika Zsibritia.	The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.	Plaintiffs Class Plaintiffs		
		The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents pertaining to Monika Zsibritia are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Durmond, any related information or evidence concerning the illegal recording of			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
239.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.	<p>telephone conversations between Monika Zsibrita and members of the Class that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs	Kerkorian, Kirk Grey, Brad Greenberg Glusker and Fields	Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen. Grey, Greenberg Glusker, and Fields object to this request to the extent it calls for the production of documents relating to Brad Grey, Greenberg Glusker, Fields, the Zenga case, or any other case relating to Grey, Greenberg Glusker, and/or Fields. (1) to the extent

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. Dumond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings, transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative</p>			<p>they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Grey, Fields, or Greenberg Glusker or its attorneys produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Wright and Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in <i>Kasper, et al. v. Pacific Bell Tel. Co.</i></p>			<p>28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Parties are able to obtain the same information through civil discovery – and in fact have already commenced the process of doing so. Zenga has propounded several document requests and other discovery requests upon Brad Grey, Greenberg Glusker, and Fields, and discovery is continuing. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Grey, Greenberg Glusker, and Fields produced documents that contain attorney work product or attorney-client</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to Requesting Parties or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Parties must request the documents from Grey, Greenberg Glusker and Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
240.	All Documents obtained by You pursuant to search warrants and subpoenas as	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints	Plaintiffs Class		because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i> , 280 F.2d 52, 54 (2nd Cir. 1960). Indeed, in 2009, Fields and Greenberg Glusker – who possess the requested documents – notified at least plaintiff Zenga of this rule and offered to work with plaintiff Zenga to produce relevant, non-privileged documents in response to a proper civil document request. To this date no Civil Litigant has propounded proper civil document requests on Fields, Grey, and/or Greenberg Glusker or any of its attorneys for the materials Requesting Parties now seek from the Government. Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Anita Busch.</p>	<p>that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. Dumond, or any member of the Class, as well as records from the databases evidencing</p>	<p>Plaintiffs</p>		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
241.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal	<p>improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings, transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Erin Finn, Robert Pfeifer, Alan J. Weil, and/or Michael Gerbosi.</p>	<p>the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. DuMond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
242.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States	<p>once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings, transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Alexander Kasper.</p>	<p>documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. DuMond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
243.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony	<p>destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings, transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Hayley DuMond.</p>	<p>lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. DuMond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
244.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible	Plaintiffs Class Plaintiffs		
		from Pellicano Investigative Agency that may include audio recordings, transcripts, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.			

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Lee O. DuMond.</p>	<p>evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co., unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. DuMond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
245.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the	<p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p> <p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the</p>	Plaintiffs Class Plaintiffs	Kerkorian, Kirk	Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Lisa Kerkorian.</p>	<p>Requesting Parties' complaints. Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. Dumond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings,</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
246.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California,	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the	Class Plaintiffs		
		transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Monika Zsibrita.</p>	<p>Requesting Parties' complaints. Class Plaintiffs: The requested documents which were obtained by search warrants or subpoenas may include documents produced by Pacific Bell Tel. Co., formerly SBC Communications, Inc., computer programs seized from Pellicano Investigative Agency, and other critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the telephone records of wiretapped persons documenting illegally recorded telephone conversations of Plaintiff Alex Kasper, Lee O. DuMond, or any member of the Class, as well as records from the databases evidencing improper and unlawful searches for confidential customer information that were once available but have since been destroyed or lost, and documents seized from Pellicano Investigative Agency that may include audio recordings,</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
247.	All Documents evidencing, reflecting, or referring to any actual or potential grant of immunity from criminal prosecution to Chris Rock for crimes or potential criminal charges associated with Chris Rock use of Pellicano's services.	transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.	The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.	Plaintiffs	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Monika Zsborita's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
248.	All unsealed search warrants issued by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.	admissible evidence concerning the allegations in the complaint.	Plaintiffs Class Plaintiffs		
		The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested search warrants will likely help Plaintiffs and the Class identify critical evidence obtained and/or in the possession of the Government in the course of the Government's investigation. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning documents and materials obtained by the Government pursuant to search warrants, including but not limited to documents seized from			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
249.	All subpoenas for records issued by You as part of Your Investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.	<p>Pellicano Investigative Agency that may include audio recordings, transcriptions, or summaries of illegally recorded telephone conversations of Plaintiffs or any member of the Class, as well as the computer programs and files seized from Pellicano Investigative Agency, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
250.	All privilege logs provided by any Person to You in response to a subpoena or any other requests or	<p>the possession of the Government in the course of the Government's investigation. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning documents and materials obtained by the Government pursuant to subpoenas for records, including but not limited to telephone and database records obtained from Pacific Bell Tel. Co (formerly SBC Communications), are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs Class Plaintiffs	Grey, Brad Greenberg Glusker and	Grey, Greenberg Glusker, and Fields object to this request to the extent it calls for the production of documents relating to Brad Grey, Greenberg

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>demands issued by You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format.</p>	<p>illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested privilege logs will assist Plaintiffs and the Class to identify critical evidence withheld from the Government despite subpoenas or requests made in the course of the Government's investigation. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning documents and materials obtained by the Government pursuant to subpoenas or other requests, including but not limited to records in the possession of Pacific Bell Tel. Co (formerly SBC Communications and records in the possession of the criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to,</p>		<p>Fields</p>	<p>Glusker, Fields, the Zenga case, or any other case relating to Grey, Greenberg Glusker, and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993). First, to the extent Grey, Fields, or Greenberg Glusker or its attorneys produced documents in response to grand jury subpoenas, these documents</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		<p>liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in <i>Kasper, et al. v. Pacific Bell Tel. Co.</i></p>			<p>constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Grey and his counsel, and Greenberg Glusker, Fields, and their counsel created and produced to the DOJ privilege logs summarizing information withheld from production in response to the DOJ's subpoenas in connection with the grand jury proceedings. Therefore, these privilege logs, along with any other documents created for the grand jury investigation, cannot be disclosed. Moreover, the Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Parties are able to obtain the same information through civil discovery –</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>and in fact have already commenced the process of doing so. Zenga has propounded several document requests and other discovery requests upon Brad Grey, Greenberg Glusker, and Fields, and discovery is continuing. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Grey, Greenberg Glusker, and Fields produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to Requesting Parties or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Parties must request the documents from Grey, Greenberg Glusker and Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960). Indeed, in 2009, Fields and Greenberg Glusker – who possess the requested documents – notified at least plaintiff Zenga of this rule and offered to work with plaintiff Zenga to produce relevant, non-privileged documents in response to a proper civil document request. To this date no Civil Litigant has propounded proper civil document requests on Greenberg Glusker, Fields and/or Grey for the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
251.	All Documents evidencing, reflecting, or referring to any Communications between Jacqueline A. Colburn and Pellicano, from May 1, 1998 to the present.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		materials Requesting Parties now seek from the Government. Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.
252.	All Documents evidencing, reflecting, or referring to any Communications between Jacqueline A. Colburn and You (and/or	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
253.	<p>any other law enforcement personnel) regarding Jacqueline A. Colburn use of Pellicano's services to wiretap, eavesdrop and/or record Communications at 1120 La Colina, Beverly Hills, California.</p>	<p>McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>	<p>Plaintiffs</p>		
254.	<p>All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) evidencing, reflecting, or referring to any interview or questioning of Jacqueline A. Colburn by You (and/or any other law enforcement personnel) regarding her use of Pellicano's services for illegal wiretaps, eavesdropping and/or recordings.</p>	<p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>	<p>Plaintiffs</p>		
	<p>All Documents evidencing, reflecting, or referring to any actual or potential grant of immunity from criminal prosecution to Jacqueline</p>	<p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette</p>	<p>Plaintiffs</p>		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	A. Colburn for crimes or potential criminal charges associated with Jacqueline A. Colburn use of Pellicano's services.	McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
255.	All Documents evidencing, reflecting, or referring to Jacqueline A. Colburn's use of Pellicano's services for wiretapping, eavesdropping, and/or recording of telephone Communications.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
256.	All Documents evidencing, reflecting, or referring to any Communications between Jacqueline A. Colburn and You relative to	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
257.	Your prosecution of Pellicano for illegal wiretaps, eavesdropping and/or recordings.	McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
258.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Richard D. Colburn.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
259.	All Documents reflecting, evidencing, or referring to any payment by Jacqueline A. Colburn to Pellicano for Pellicano's services.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
260.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) reflecting, evidencing, or	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	referring to any telephonic Communication to or from 1120 La Colina, Beverly Hills, California, which was the subject of a wiretap, eavesdrop, and/or recording by Jacqueline A. Colburn and/or Pellicano.	McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
261.	All Documents identifying any law enforcement personnel (sufficient to allow service of a trial subpoena) who interviewed Jacqueline A. Colburn regarding her retention and use of Pellicano's services to wiretap, eavesdrop, and/or record telephone Communications at 1120 La Colina, Beverly Hills, California.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
262.	All Documents evidencing, reflecting, or referring to any Communications between Robert Nachshin and You (and/or any other	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette	Plaintiffs		

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	law enforcement personnel) regarding Your prosecution of Pellicano, that refer or pertain to Jacqueline A. Colburn's use of Pellicano's services to wiretap, eavesdrop, and/or record Communications emanating from or to 1120 La Collina, Beverly Hills, California.	McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
263.	All Documents evidencing, reflecting, or referring to any Communications between Robert Nachshin and You that pertain or refer to Richard D. Colburn.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
264.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.)	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
265.	<p>evidencing, reflecting, or referring to any conversation or communication wiretapped, recorded, or eavesdropped upon by Pellicano on Jacqueline A. Colburn's behalf for telephone Communications emanating from or to 1120 La Collina, Beverly Hills, California.</p>	<p>the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>	Plaintiffs		
266.	<p>All recordings in any medium (including, but not limited to digital or analog recordings, DVD, Compact Disc, cassette, micro-cassette, digital tape, and/or computer file), that evidence, reflect, or refer to Communications emanating from or to 1120 La Collina, Beverly Hills, California, that was wiretapped, recorded or eavesdropped upon by Pellicano on Jacqueline A. Colburn's behalf.</p>	<p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>	Plaintiffs		
266.	All Documents reflecting,	The Government is the only source of the	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>evidencing, or referring to any waiver of the attorney-client privilege by Jacqueline A. Colburn relative to Communications between Robert Nachshin and/or Nachshin & Weston, LLP and Jacqueline A. Colburn.</p>	<p>requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>			
267.	<p>All Documents evidencing, reflecting, or referring to any Communications between Robert Nachshin and/or Nachshin & Weston, LLP (on the one hand) and any law enforcement personnel regarding Jacqueline A. Colburn's use of Pellicano's services to wiretap, record or eavesdrop upon telephone Communications at 1120 La Colina, Beverly Hills, California.</p>	<p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p>	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
268.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) evidencing, reflecting, or referring to any interviews of Robert Nachshin by You (and/or any law enforcement personnel) regarding Pellicano, that refer or pertain to Jacqueline A. Colburn's use of Pellicano's services to wiretap, eavesdrop, and/or record telephone Communications.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
269.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) evidencing, reflecting, or referring to any interviews of Robert Nachshin by You (and/or any law enforcement personnel) regarding any criminal investigation and/or prosecution of Pellicano for illegal wiretaps,	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
270.	All Documents that evidence, reflect or refer to Lilly LeMaster's contact information (current address and/or telephone number) sufficient to allow service of a trial subpoena.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint. Class Plaintiffs: The requested documents containing contact information for Lily LeMasters will assist Plaintiffs and the Class to ascertain the present whereabouts of this critical witness. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond,	Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
271.	All Documents that evidence, reflect or refer to Tarita Virtue's contact information (current address and/or telephone number) sufficient to allow service of a trial subpoena.	<p>any related information or evidence concerning testimony thereon from a former employee of Pellicano, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs		
		<p>The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p> <p>Class Plaintiffs: The requested documents containing contact information for Tarita</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
272.	All Documents that evidence, reflect or refer to Richard Campau's contact information (current address and/or telephone number) sufficient to allow service of a trial subpoena.	<p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p> <p>Virtue will likely help Plaintiffs and the Class ascertain the present whereabouts of this critical witness. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning testimony thereon from a former employee of Pellicano, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p>	Plaintiffs Class Plaintiffs		

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		<p>engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.</p> <p>Class Plaintiffs: The requested documents containing contact information for Richard Campau will likely help Plaintiffs and the Class ascertain the present whereabouts of this critical witness. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning testimony thereon from a former employee of Pellicano, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
273.	All Documents identifying all Persons in the chain of custody (sufficient to allow service of a trial subpoena) regarding Documents seized or taken from Pellicano's office(s) that evidence, reflect, or pertain to Jacqueline A. Colburn's retention and use of Pellicano's services to wiretap, eavesdrop upon, and/or record telephone Communications at 1120 La Colina, Beverly Hills, California.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs		
274.	All Documents that evidence, reflect or refer to contact information as (current address and/or telephone number) sufficient to allow service of a trial subpoena of any former Pellicano employee or other Person previously providing service to Pellicano who observed Pellicano or Jacqueline A. Colburn engaging in	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiffs Colette McDougall, Richard W. Colburn, Carol Colburn-Hogel, and Keith W. Colburn's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the	Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>eavesdropping, recording, or wiretapping Communications emanating from or to 1120 La Colina, Beverly Hills, California.</p>	<p>allegations in the complaint. Class Plaintiffs: The requested documents containing contact information for former employees of Pellicano will assist Plaintiffs and the Class to ascertain the present whereabouts of these critical witnesses. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning testimony thereon from former employees of Pellicano, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages. The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	<p>Plaintiffs</p>	<p>Kirkorian, Kirk</p>	<p>Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production</p>
275.	<p>All Documents produced by the law firm of Greenberg Glusker Fields, Claman,</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints</p>	<p>Plaintiffs</p>	<p>Kirkorian, Kirk</p>	<p>Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Machtinger & Kinsella LLP pursuant to search warrants, subpoenas or any other requests or demand to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>		<p>Grey, Brad Greenberg Glusker and Fields</p>	<p>of documents reflecting communications between Pellicano and Terry Christensen. Grey, Greenberg Glusker, and Fields object to this request to the extent it calls for the production of documents relating to Brad Grey, Greenberg Glusker, Fields, the Zenga case, or any other case relating to Grey, Greenberg Glusker, and/or Fields: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Grey, Fields, or Greenberg Glusker or its attorneys produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). For example, Grey and his counsel, and Greenberg Glusker, Fields, and their counsel created and produced to the DOJ privilege logs summarizing information withheld from production in response to the DOJ's subpoenas in connection with the grand jury proceedings. Therefore, these privilege logs, along with any other documents created for the grand jury investigation, cannot be disclosed. Moreover, the Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Parties are able to obtain the same information through civil discovery – and in fact have already commenced the process of doing so. Zenga has propounded several document requests and other discovery requests upon Brad Grey, Greenberg Glusker, and Fields, and discovery is continuing. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Grey, Greenberg Glusker, and Fields produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). As discussed, Zenga has</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>propounded several document requests and other discovery requests upon Grey and his attorneys, and Grey has produced several documents, including documents relating to the retention, services, abilities, activities, work product, and payment of Pallicano. Plaintiffs, who have requested that the DOJ produce these same documents in unredacted format, should not be allowed to circumvent the attorney-client communications and work product privileges. See 28 C.F.R. § 16.26(a). Moreover, any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to Requesting Parties or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>producing party, and thus the Requesting Parties must request the documents from Grey, Greenberg Glusker and Fields pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960). Indeed, in 2009, Fields and Greenberg Glusker – who possess the requested documents – notified at least plaintiff Zenga of this rule and offered to work with plaintiff Zenga to produce relevant, non-privileged documents in response to a proper civil document request. To this date no Civil Litigant has propounded proper civil document requests on Greenberg Glusker and/or Fields for the materials</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
276.	All Documents produced by the law firm of Greenberg Glusker Fields, Claman, Machtinger & Kinsella LLP pursuant to search warrants, subpoenas or any other requests or demand to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in the Zenga matter; b.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs	Grey, Brad Greenberg Glusker	Requesting Parties now seek from the Government. Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410. See Objections to Req. No. 275.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>payments or fees made to Pellicano in the Zenga matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano in the Zenga matter.</p>				
277.	<p>All Documents produced by Bertram Fields pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs; and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	Plaintiffs	Grey, Brad Greenberg Glusker and Fields	See Objections to Req. No. 275.

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	services rendered by Pellicano.				
278.	All Documents produced by Bertram Fields pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in the Zenga matter; b. payments or fees made to Pellicano in the Zenga matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano in the Zenga matter.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs	Grey, Brad Greenberg Glusker and Fields	See Objections to Req. No. 275.
279.	All Documents produced by	The Requested Materials, if they exist,	Plaintiffs	Grey, Brad	See Objections to Req. No. 275.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>Charles Shephard pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>		<p>Greenberg Glusker</p>	
280.	<p>All Documents produced by Charles Shephard pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested</p>	<p>Plaintiffs</p>	<p>Grey, Brad Greenberg Glusker</p>	<p>See Objections to Req. No. 275.</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
281.	<p>Investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in the Zenga matter; b. payments or fees made to Pellicano in the Zenga matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano in the Zenga matter.</p>	<p>documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	<p>Plaintiffs</p>	<p>Grey, Brad Greenberg Glusker and David Moriarty</p>	<p>See Objections to Req. No. 275.</p>
	<p>All Documents produced by David Moriarty pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al.,</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>			

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
282.	<p>United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	<p>Plaintiffs</p>	<p>Grey, Brad Greenberg Glusker and David Morarty</p>	<p>See Objections to Req. No. 275.</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
283.	<p>relate to: a. the decision to hire or retain Pellicano in the Zenga matter; b. payments or fees made to Pellicano in the Zenga matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano in the Zenga matter.</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	<p>Plaintiffs</p>	<p>Grey, Brad Greenberg Glusker</p>	<p>Grey and Greenberg Glusker object to the production of these documents: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); and (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus is not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2). First, to the extent Brad Grey or Greenberg Glusker or its attorneys produced documents that were created in connection with the grand jury</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>any matter, c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>				<p>investigation, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). For example, Grey and his counsel created and produced to the DOJ privilege logs summarizing information withheld from production in response to the DOJ's subpoenas in connection with the grand jury proceedings. Therefore, these privilege logs, along with any other documents created for the grand jury investigation, cannot be disclosed. Moreover, Requesting Parties have failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, Requesting Parties merely assert that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Furthermore,</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>Requesting Parties are able to obtain the same information through civil discovery – and in fact have already done so. Zenga has propounded several document requests and other discovery requests upon Grey, Greenberg Glusker, and Fields, and discovery is continuing. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Grey or Greenberg Glusker or its attorneys produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). The Government subpoenaed Grey and compelled him to produce certain documents with respect to Pellicano. Pursuant to an agreement between Grey and the USAO, memorialized in correspondence dated January 13 and January 14, 2004 between Grey's counsel and Assistant United States Attorney Kevin Lally, Grey waived certain attorney-client and attorney work product privileges in</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>connection with his production of documents to the USAO. These productions were made pursuant to grand jury subpoenas. Grey's production to the Government pursuant to this agreement does not waive these privileges with respect to the plaintiffs or any other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008). As discussed, Zenga has propounded several document requests and other discovery requests upon Grey, Greenberg Glusker, and its attorneys, and Grey has produced several documents, including documents relating to the retention, services, abilities, activities, work product, and payment of Pellicano. Plaintiffs, who have requested that the DOJ produce these same documents in unredacted format, should not be allowed to circumvent the attorney-client communications and work product privileges. See 28 C.F.R. § 16.26(a).</p> <p>Greenberg Glusker and Fields also object to this request to the extent it is asking for documents and information</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
284.	All Documents produced by Brad Grey pursuant to search warrants, subpoenas or any other requests or demands to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in the Zenga matter; b. payments or fees made to Pellicano in the Zenga matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano. in the Zenga matter.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs	Grey, Brad Greenberg Glusker	See Objections to Req. No. 283. protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
285.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Vincent "Bo" Zenga.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Class Plaintiffs: The requested documents pertaining to Plaintiff Bo Zenga are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between Bo Zenga and members of the Class that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory	Plaintiffs Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
286.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Gregory Dovel.	<p>and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p> <p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p> <p>Class Plaintiffs: The requested documents pertaining to Gregory Dovel, who is a member of the Class, are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and</p>	Plaintiffs Class Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
287.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Stacey Codlikow.	<p>Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between Bo Zenga and Gregory Dovel that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs' statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
288.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Zoriana Kit.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs		
289.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Mary Sullivan.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs		
290.	All Documents produced by Adam Sender pursuant to search warrants, subpoenas or any other requests or demand to You as part of Your investigation or prosecution of any criminal defendant in United	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	<p>States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>evidence concerning the allegations in the Requesting Parties' complaints.</p>			
291.	<p>All Documents produced by the law firm of Christensen, Glaser, Fink, Jacobs, Weil & Shapiro, LLP pursuant to search warrants, subpoenas or any other requests or demand to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
292.	<p>for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.				
293.	Any evidence of or testimony relating to the wiretapping and police database searches relating to Plaintiffs Keith Carradine and Hayley DuMond.	This information is necessary in order to defend against and evaluate the claims made against Ms. Carradine by plaintiffs Keith Carradine and Hayley DuMond. The evidence is not otherwise accessible to Ms. Carradine and is only available from the Government. Class Plaintiffs: The requested documents pertaining to wiretapping of Keith Carradine and Hayley DuMond are critical evidence to Plaintiffs and the Class. Because Plaintiffs, individually and on behalf of the Class, have alleged that Pacific Bell Tel. Co. unlawfully engaged in a common scheme to unlawfully wiretap and illegally record the confidential communications of plaintiffs such as Alexander Kasper and Lee O. Dumond, any related information or evidence concerning the illegal recording of telephone conversations between Keith	Carradine, Sandra Class Plaintiffs		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
294.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Robert Clayton, Martin Singer, Robert Nachshin, Scott Weston, Stephen Barnes, and Mark Landesman in connection with Chris Rock or Stephen Barnes.	<p>Carradine, Hayley DuMond, and members of the Class – including Plaintiff Lee O. DuMond – that were obtained by the Government in the course of its investigation and prosecution of Pellicano, Teresa Wright and Rayford Turner, among other criminal defendants, are highly relevant to Plaintiffs’ statutory and common law claims as well as various legal issues including but not limited to, liability and damages.</p> <p>The Government is the only source of the requested materials and such materials, should they exist, bear directly on the allegations, claims and defenses made in Kasper, et al. v. Pacific Bell Tel. Co.</p>	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
295.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to the publications The Globe and/or The National Enquirer,	The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints, including but not limited to those claims made by Monika Zsibrita, that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. Pellicano is believed to have been a source for the tabloids, including the publications listed herein. Ms. Zsibrita's picture was published in The Globe as was information about personal telephone calls she made at the time. Any documents showing Pellicano's relationship with these publications should be provided.	Plaintiffs		
296.	All Documents produced by the law firm Gaimis, Weil, West & Epstein LLP	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints	Plaintiffs		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
297.	<p>pursuant to search warrants, subpoenas or any other requests or demand to You as part of Your investigation or prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that relate to: a. the decision to hire or retain Pellicano in any matter; b. payments or fees made to Pellicano in any matter; c. any document submitted by Pellicano that relates to services rendered by Pellicano.</p>	<p>that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.</p>	<p>Plaintiffs</p>	<p>Kerkorian, Kirk</p>	<p>Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.</p>
297.	<p>Any evidence of or testimony relating to the wiretapping and police database searches relating to the following: Timea Zsibrita, Monika Zsibrita, Etienne Ketcha, Pamela</p>	<p>The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to</p>	<p>Plaintiffs</p>	<p>Kerkorian, Kirk</p>	<p>Kerkorian objects to this request on the grounds of the attorney-client privilege to the extent that it seeks the production of documents reflecting communications between Pellicano and Terry Christensen.</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Miller, Richard Miller, Joyce Miller, Erin Finn, Michael Gebosi, Kissandra Cohen, Ami Shafir, Lisa Kerkorian, or other persons related thereto including the parties' respective attorneys.	lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.			
298.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Daniel and/or Abner Nicherie, in connection with Ami Shafir	The Government is the only source of the requested materials and such materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints, including but not limited to those claims made by Ami Shafir, that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints. The persons listed are The Nicherie brothers believed to have been involved in the retention and payment of Pellicano.	Plaintiffs Shafir, Ami		
299.	All Documents obtained by You pursuant to search warrants and subpoenas as part of Your investigation or	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in	Plaintiffs Shafir, Ami		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	prosecution of any criminal defendant in United States of America v. Anthony Pellicano, et al., United States District Court for the Central District of California, Case Number: CR 05-01046(c)-DSF, in unredacted format, that pertains or relates to Ami Shafir.	illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.			
300.	All Documents evidencing, reflecting, or referring to any actual or potential grant of immunity from criminal prosecution to Daniel and/or Abner Nicherie for crimes or potential criminal charges associated with their use of Pellicano's services regarding Ami Shafir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafir, Ami		
301.	All Documents evidencing, reflecting, or referring to any Communications between Daniel and/or Abner Nicherie and	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafir's civil	Plaintiffs Shafir, Ami		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Pellicano, from January 1, 2000 to the present.	complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
302.	All Documents evidencing, reflecting, or referring to any Communications between Daniel and/or Abner Nicherie and You (and/or any other law enforcement personnel) regarding Daniel and/or Abner Nicherie's use of Pellicano's services to wiretap, eavesdrop and/or record Communications regarding Ami Shafrir	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafrir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafrir, Ami		
303.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) evidencing, reflecting, or referring to any interview or questioning of Daniel and/or Abner Nicherie by You	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafrir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the	Plaintiffs Shafrir, Ami		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
304.	All Documents evidencing, reflecting, or referring to any actual or potential grant of immunity from criminal prosecution to Daniel and/or Abner Nicherie for crimes or potential criminal charges associated with their use of Pellicano's services re Amri Shafir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Amri Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafir, Amri		
305.	All Documents evidencing, reflecting, or referring to Daniel and/or Abner Nicherie's use of Pellicano's services for wiretapping, eavesdropping, and/or recording of telephone Communications regarding	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Amri Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the	Plaintiffs Shafir, Amri		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	Ami Shafrir.	requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
306.	All Documents evidencing, reflecting, or referring to any Communications between Daniel and/or Abner Nicherie and You relative to Your prosecution of Pellicano for illegal wiretaps, eavesdropping and/or recordings of Ami Shafrir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafrir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafrir, Ami		
307.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Plaintiff Ami Shafrir, including but not limited to police database searches.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafrir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafrir, Ami		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
308.	All Documents reflecting, evidencing, or referring to any payment by Daniel and/or Abner Nicherie to Pellicano for Pellicano's services regarding Ami Shafir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafir, Ami		
309.	All Documents identifying any law enforcement personnel (sufficient to allow service of a trial subpoena) who interviewed Daniel and/or Abner Nicherie regarding their retention and use of Pellicano's services to wiretap, eavesdrop, and/or record telephone Communications regarding Ami Shafir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Plaintiffs Shafir, Ami		
310.	All Documents identifying all Persons in the chain of custody (sufficient to allow	The Government is the only source of the requested information and documentation and such requested information and	Plaintiffs Shafir		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	service of a trial subpoena) regarding Documents seized or taken from Pellicano's office(s) that evidence, reflect, or pertain to Daniel and/or Abner Nicherie's retention and use of Pellicano's services to wiretap, eavesdrop upon, and/or record telephone Communications regarding Ami Shafir	documents, if they exist, bear directly on the allegations in Plaintiff Ami Shafir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
311.	All Documents seized or taken from Pellicano by You or other law enforcement personnel pertaining or referring to Ami Shafir.	The Requested Materials, if they exist, bear directly on the allegations made by all Requesting Parties in their civil complaints that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the Requesting Parties' complaints.	Plaintiffs Shafir, Ami		
312.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Andrew Stevens.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named	LaViolette		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
313.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to John LaViolette.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	LaViolette		
314.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Tom Cruise.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the	Sapir, Michael Davis		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
315.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Nicole Kidman.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis		
316.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Plaintiff Michael Davis Sapir, including but not limited to police database searches.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis		
317.	All Documents evidencing,	The Government is the only source of the	Sapir,		

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	reflecting, or referring to any Communications between Tom Cruise and Pellicano, from January 1, 1990 to the present.	requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Michael Davis		
318.	All Documents evidencing, reflecting, or referring to any Communications between Tom Cruise and You (and/or any other law enforcement personnel) regarding Tom Cruise's use of Pellicano's services to wiretap, eavesdrop and/or record Communications.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis		
319.	All Documents (including but not limited to transcripts, summaries, digests, outlines, etc.) evidencing, reflecting, or	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis	Sapir, Michael Davis		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
	referring to any interview or questioning of Tom Cruise by You (and/or any other law enforcement personnel) regarding her use of Pellicano's services for illegal wiretaps, eavesdropping and/or recordings.	Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.			
320.	All Documents evidencing, reflecting, or referring to Tom Cruise's use of Pellicano's services for wiretapping, eavesdropping, and/or recording of telephone Communications.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis		
321.	All Documents evidencing, reflecting, or referring to any Communications between Tom Cruise and You relative to Your prosecution of Pellicano for illegal wiretaps,	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal	Sapir, Michael Davis		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
322.	All Documents seized or taken from Pellicano by law enforcement personnel pertaining or referring to Michael Davis Sapir.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis		
323.	All Documents reflecting, evidencing, or referring to any payment by Tom Cruise to Pellicano for Pellicano's services.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence	Sapir, Michael Davis	Greenberg Glusker	Greenberg Glusker objects to this request to the extent it calls for the production of documents relating to Greenberg Glusker, Fields, any case in which Greenberg Glusker represented Cruise: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim.

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
		concerning the allegations in the complaint.			<p>P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sells Eng'g, Inc.</i>, 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Greenberg Glusker or its attorneys produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized</p>

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					<p>need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4 (1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Greenberg Glusker or its attorneys produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege</p>

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					<p>with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Greenberg Glusker pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavaq, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States</i></p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
324.	All Documents reflecting, evidencing, or referring to any payment made by any person or entity on behalf of Tom Cruise to Pellicano for Pellicano's services.	The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in Plaintiff Michael Davis Sapir's civil complaint that the named defendants engaged in illegal wiretapping/invasion of privacy of the plaintiffs, and/or the requested documents are reasonably calculated to lead to the discovery of admissible evidence concerning the allegations in the complaint.	Sapir, Michael Davis	Greenberg Glusker	Greenberg Glusker objects to this request to the extent it calls for the production of documents relating to Greenberg Glusker, Fields, any case in which Greenberg Glusker represented Cruise: (1) to the extent they reveal the substance of the grand jury investigation and thus constitute confidential grand jury materials that cannot be released by the DOJ without prior court approval, see Fed. R. Crim. P. 6(e); 28 C.F.R. § 16.26; <i>United States v. Sellis Eng'g, Inc.</i> , 463 U.S. 418, 440 (1983); (2) to the extent these documents contain material protected by the attorney-client privilege and work

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>product doctrine and thus are not appropriate for disclosure under 28 C.F.R. § 16.26(a)(2); and (3) to the extent these are the producing party's business documents, they remain the property of the producing party and thus a third party seeking the documents must request them from the producing party pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993).</p> <p>First, to the extent Greenberg Glusker or its attorneys produced documents in response to grand jury subpoenas, these documents constitute grand jury materials and cannot be disclosed without court approval, since disclosure would violate Rule 6(e). See 28 C.F.R. § 16.26; <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1412 (9th Cir. 1993). Moreover, the Requesting Party has failed to even allege a particularized need for these materials that outweighs the need for grand jury secrecy, as would be required for a court order allowing disclosure. <i>United States v. Baggot</i>, 463 U.S. 476, 480 at n. 4</p>

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>(1983). Here, the Requesting Party merely asserts that the materials are relevant and solely in the possession of the Government – which falls far below the standard required. See <i>United States v. Proctor & Gamble Co.</i>, 356 U.S. 677, 682 (1958). Second, the Requesting Party is able to obtain the same information through civil discovery. Therefore, no particularized need exists for the DOJ to disclose the documents requested, and as such a court should not authorize any disclosure.</p> <p>Second, to the extent Greenberg Glusker or its attorneys produced documents that contain attorney work product or attorney-client communications, these documents should not be produced. See 28 C.F.R. § 16.26(a). Any privileged documents produced to the Government as a result of a subpoena or other Government compulsion does not waive privilege with respect to the Requesting Party or other parties. See <i>Regents of University of California v. Superior Court</i>, 165 Cal. App. 4th 672 (2008) (holding that production of documents in</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
					<p>response to grand jury subpoenas did not waive privilege as to third parties because of the coercive nature of the grand jury's subpoenas).</p> <p>Third, business documents which are produced pursuant to a grand jury subpoena remain the property of the producing party, and thus the Requesting Party must request the documents from Greenberg Glusker pursuant to authority provided in an applicable statute or Federal Rule of Civil Procedure. See <i>United States v. Dynavac, Inc.</i>, 6 F.3d 1407, 1415 (9th Cir. 1993) (holding that "[d]ocuments produced pursuant to a grand jury subpoena remain the property of the person producing them;" and holding that the documents could be produced because the IRS properly served the defendants who had produced the documents to the grand jury and did not request the documents from the United States Attorney) (quoting <i>United States v. Interstate Dress Carriers, Inc.</i>, 280 F.2d 52, 54 (2nd Cir. 1960)). To this date no Civil Litigant has propounded proper civil document requests on Grey or Greenberg Glusker for the materials</p>

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
325.	All Documents obtained from John LaViolette.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		the Requesting Party now seeks from the Government. Greenberg Glusker also object to this requests to the extent it is asking for documents and information protected from disclosure under Federal Rule of Criminal Procedure 11(f) and Federal Rules of Evidence 408 and 410.
326.	All Documents provided to John LaViolette, including but not limited to recordings of telephone calls and investigative summaries.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
327.	All investigative summaries concerning John LaViolette.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
328.	All Documents, including handwritten notes, from which investigative summaries concerning John LaViolette were compiled.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
329.	All Documents concerning or evidencing wiretapping of John LaViolette's telephone lines.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		

No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
330.	All recordings of John LaViolette's telephone calls.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
331.	All transcripts of John LaViolette's recorded telephone calls.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
332.	All recordings of telephone calls regarding John LaViolette.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
333.	All transcripts of telephone calls regarding John LaViolette.	The parties in the LaViolette Civil Case are plaintiff John LaViolette and defendant Andrew Stevens. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
334.	All Documents produced to Steven Brown.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
335.	All Documents obtained from Steven Brown.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
336.	All Documents provided to Steven Brown, including but not limited to recordings of telephone calls and investigative summaries.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information and documentation and such requested information and documents, if they exist, bear directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
337.	All investigative summaries concerning Steven Brown.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
338.	All Documents, including handwritten notes, from which investigative summaries concerning Steven Brown were compiled.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
339.	All Documents concerning or evidencing wiretapping of Steven Brown's telephone lines.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
340.	All recordings of Steven Brown's telephone calls.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
341.	All transcripts of Steven Brown's recorded telephone calls.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
342.	All recordings of telephone calls regarding Steven Brown.	Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the	Stevens, Andrew		

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No.	Request	Grounds for Request	Requesting Party	Party Objecting to Specific Request	Grounds for Objection
343.	All transcripts of telephone calls regarding Steven Brown.	allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.	Stevens, Andrew		
		Steven Brown had discussions with the Government about the wiretapping of his phone lines by Pellicano. It is further alleged that a phone call between Brown and LaViolette was recorded. The Government is the only source of the requested information, the requested information bears directly on the allegations in the LaViolette Civil Case and the request is reasonably calculated to lead to the discovery of admissible evidence.			

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<i>Attorney or Party without Attorney:</i> KATHERINE E. HERTEL, ESQ., Bar No. 13939 JONES DAY 555 SOUTH FLOWER STREET 50TH FLOOR LOS ANGELES, CA 90071 Telephone No: 213-489-3939 FAX No: 213-243-2539				<i>For Court Use Only</i>	
<i>Attorney for:</i> Defendant				Ref. No. or File No.:	
<i>Insert name of Court, and Judicial District and Branch Court:</i> LOS ANGELES COUNTY SUPERIOR COURT - CENTRAL CIVIL WEST					
<i>Plaintiff:</i> BO ZENGA <i>Defendant:</i> CITY OF LOS ANGELES, ET AL.					
PROOF OF SERVICE DEPOSITION SUBPOENA		<i>Hearing Date:</i> Mon, Jul. 26, 2010	<i>Time:</i> 1:00PM	<i>Dept/Div:</i>	<i>Case Number:</i> BC316318

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of the DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS
3.
 - a. Party served: DANIEL A. SAUNDERS, ASSISTANT U.S. ATTORNEY
 - b. Person served: Ariel Clark, Authorized to Accept Service
4. Address where the party was served:

1500 UNITED STATES COURTHOUSE
312 N. SPRING STREET
LOS ANGELES, CA 90012
5. I served the party:
 - a. by **personal service**. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on: Thu., May. 27, 2010 (2) at: 10:02AM
 - b. I received this subpoena for service on: Wednesday, May 26, 2010
6. Witness fees were offered or demanded, and paid: \$15.00
7. **Person Who Served Papers:**
 - a. DOUG FORREST
 - b. **FIRST LEGAL SUPPORT SERVICES**
1511 W. BEVERLY BLVD.
LOS ANGELES, CA 90071
 - c. 213-250-1111
 - d. **The Fee for Service was:** Recoverable Cost Per CCP 1033.5(a)(4)(B)
 - e. I am: (3) registered California process server
 - (i) Independent Contractor
 - (ii) Registration No.: 5141
 - (iii) County: Los Angeles

8. I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: Thu, May. 27, 2010

