

**NOTICE: THIS DOCUMENT
CONTAINS SENSITIVE DATA**

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**IN THE MATTER OF
THE MARRIAGE OF**

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IN THE COUNTY COURT

COURT FOUR

WILLIAMSON COUNTY, TEXAS

**FIRST REQUEST FOR
PRODUCTION AND INSPECTION OF DOCUMENTS
TO RESPONDENT**

TO: (hereinafter referred to as the “Responding Party”) by and through his counsel of record.

FROM: , by and through her attorney of record,
Terence Davis, (hereinafter referred to as the “Requesting Party”).

**I.
DEFINITIONS**

“Responding Party” and “Requesting Party” – refer to the parties specifically identified above.

“You,” and “your” refer to and are intended to include the “Responding Party” set forth above, your employees, and/or your agents, either individually or as a representative of any corporation, association, or partnership, as the case may be, as well as any testifying expert witnesses retained by you or retained on your behalf relating to this litigation and any consulting experts whose work product has been reviewed by, relates to, or forms the basis, either in whole or in part, of the mental impressions and opinions of any testifying experts.

“Person” includes and is intended to mean any natural person or the representative of any company, limited liability company, firm, nonpublicly traded corporation, association, trust, business trust, partnership, limited partnership, family limited partnership, limited liability partnership, joint venture, proprietorship, or any other form of business entity.

“EntRity” or “entities” includes and is intended to mean any company, limited liability company, firm, nonpublicly traded corporation, association, trust, business trust, partnership, limited partnership, family limited partnership, limited liability partnership, joint venture, proprietorship, or any other form of business entity.

“Relates to” means in whole or in part constitutes, contains, concerns, embodies, relates, analyzes, identifies, states, refers to, deals with, or in any way pertains to.

“Item,” “document,” or “documents” includes, but is not limited to, each tangible thing, recording, or reproduction of any visual or auditory information, including but not limited to papers, books, accounts, drawings, graphs, charts, photographs, electronic or videotape recordings, data, and data compilations, however made, whether handwritten, typewritten, or printed material, drafts, duplicates, carbon copies, photocopies, e-mail, scanned documents, digital documents, and all other copies.

“Parties” means Petitioner or Respondent or both Petitioner and Respondent.

“Fringe benefit” means any benefit from an employer apart from salary, including but not limited to payment of personal expenses; payment of housing expenses; vacation pay; payment of medical, hospitalization, or dental insurance, life insurance, annuities, and disability insurance policies; payment of automobile expenses (including note payment, gasoline, repairs, maintenance, insurance, and mileage compensation); payment of travel allowances; deferred compensation plans, 401(k) contributions, stock options, or retirement or pension benefits; country club or other memberships; use of company airplanes, homes, boats, or cars; payment of business professional dues; interest-free or low-interest loans; payment of legal fees; accounting or bookkeeping services; and payment for items used by you personally.

“Identify” means to provide the information necessary, name, address, and phone number of the person or entity or provide the location of the document requested.

II. INSTRUCTIONS

A. Duty to Amendment or Supplement Response pursuant to TRCP 193.5

If you learn that your response to this request was incomplete or incorrect when made or that, although it was complete and correct when made, it is no longer complete and correct, you must amend or supplement the response -

1. to the extent that the request seeks the identification of persons with knowledge of relevant facts, trial witnesses, or expert witnesses, and

2. to the extent that the request seeks other information, unless the additional or corrective information has been made known to the other parties in writing, on the record at a deposition, or through other discovery responses.

You must make amended or supplemental responses reasonably promptly after you discover the necessity for such a response.

EXHIBIT "A"

REQUESTS FOR PRODUCTION AND INSPECTION OF DOCUMENTS AND TANGIBLE THINGS

Time Period. The items and/or categories listed herein below refer to "documents" (as that term is defined herein) which are presently existing and/or which reflect facts which are presently existing, and/or which arose or came into existence either three years prior to the date this suit was filed to the present, unless another time period is expressly indicated for a particular item or category of items, or unless an indication is made at the end of an item or category of items that there is no time limit to those documents requested.

1. *Bank Statements.* Statements prepared by any bank, savings and loan, credit union, or other financial institution on a monthly, quarterly, annual, or other basis, on all accounts and deposits, including without limitation savings accounts, checking accounts, money market accounts, and certificates of deposit, which accounts (1) are held in the name of either party to this suit; (2) are held in the name of any business entity in which either party to this suit has, or has had, any interest and/or control (if not held in the name of either party); (3) are held in the name of any alias of either party to this suit, nationally or internationally; and/or (4) are held in the name of any other person and in which either party to this suit holds an interest, in which either party to this suit expects to receive any interest, and/or over which either party to this suit has signatory or withdrawal authority.
2. *Securities and Brokerage House Accounts.* Documents pertaining to stocks, bonds, or other securities in which either party to this suit owns, or has owned, an interest, legal or equitable, whether such securities are held individually or in a brokerage house account, and for each security so held.
3. *Retirement and Other Employment Benefits.* Documents pertaining to any pension, profit sharing, deferred compensation, employee stock ownership, individual retirement account, IRA/SEP, Keogh, retirement, 401(k), and/or any other retirement and/or employment benefit plan in which either party to this suit has or has had an interest, whether vested or contingent, and for each such plan, account, or benefit, including without limitation documents which reflect the following:
 1. Standard plan description, book, booklet, and/or prospectus;
 2. Statements of employee and employer contributions from the date of employment to the present;
 3. Actuarial estimates of prospective, future benefits;

4. Account statements and supporting documents issued during the course of the plan;
 5. Statements issued by any financial institution holding a retirement account, and all documents reflecting contributions to and/or withdrawals from said account;
 6. Name and address of plan administrator; and
 7. Loans and/or other debts against which said retirement plan and/or account is pledged and/or secured.
4. *Stock Options.* Documents pertaining to stock options, restricted stock, performance based units, LTIPs and the like owned or exercised and/or gifted to either party to this suit whether vested or not, and including without limitation the actual plan and any grant documents, buyout plan, alternative minimum tax reimbursement, projected grants, granting schedules, restrictions on transfer, and the like.
5. *Earning Records.* Documents pertaining to monies earned or received by either party to this suit from any source, including without limitation pay stubs, receipts, and statements of earnings, said earnings to include without limitation wages, salary, straight time earned, overtime earned, bonuses, contract labor, commissions, fringe benefits, and/or unemployment compensation and benefits, and documents referable to deductions or withholdings from said earnings, including without limitation federal and state income tax withheld, social security (FICA) withheld, Medicare withheld, self-employment taxes, self-employment deductions, unemployment insurance, medical or other insurance deductions, stock options or purchase plans, retirement or pension plans, profit-sharing plans, employee savings plans, flexible spending accounts, day care deductions and/or credits, itemized deductions, and/or repayment of loans and/or debts.
6. *Other Monetary Receipts.* Documents pertaining to other monetary receipts received by, and/or paid to or on behalf of, either party to this lawsuit, whether denominated as loans, gifts, tax refunds, cash payments, royalties, rental income, management fees, dividends, interest, interest refunds, proceeds from sale of property, accounts receivable collections and retainers, income from partnerships and/or joint ventures, distributions from business entities, distributions and/or income from trusts, social security benefits received, periodic payments made to a retirement and/or disability program or plan, and all documents referable to all deductions or withholdings from said earnings, including without limitation federal and state income tax withheld, social security (FICA) withheld, Medicare withheld, self-employment taxes, self-employment deductions, business deductions, itemized deductions, and/or repayment of loans and/or debts.

7. *Records of Investments Instruments* (including bartering) of whatsoever nature showing investments that either party to this lawsuit has made or have been made for either party to this suit, including agreements, documents, instruments, or other papers reflecting the ownership of any interest (legal or equitable) by either party to this lawsuit in any corporation, partnership, joint venture, or other business enterprise or entity, including any interests in pension or retirement or tax deferred annuity accounts arising out of either party's employment.
8. *Notes and Other Amounts Receivable.* Documents pertaining to notes receivable, accounts receivable, and other amounts receivable in which either party to this lawsuit has or has had any interest, legal or equitable, including without limitation notes, loans, amortization schedules, records of payments received, records of amounts currently owing, advances, refunds, credit card advances, and/or lines of credit.
9. *Business Expense Records.* Documents reflecting expenses paid on behalf of either party to this lawsuit, requested to be paid by or on behalf of either party to this lawsuit, and/or to be paid for or on behalf of either party to this lawsuit, whether reimbursed or not, in connection with any business or pursuit of gain or profit, and for each such expense, including without limitation all claims and expense account vouchers, receipts for payments accompanying such claims and vouchers, receipts for reimbursements, and statements and receipts pertaining to credit cards used by either party to this lawsuit in connection with any business or pursuit of gain or profit.
10. *Debts.* Documents reflecting indebtedness owed or owing by either party to this lawsuit, including without limitation promissory notes, creditors' statements, bills, credit card statements, statements and invoices evidencing charges and debts incurred, mortgage documents, liens, debts, pending or unexpected claims against any secured property, money borrowed against any property, payment books, and documents pertaining to payments made on account for any such debts, and including without limitation end of the year and other statements on any account used by either party to this lawsuit.
11. *Secured Debts.* Records of debts or liens against any property owned by either party to this lawsuit., including mortgage documents, liens, debts, notes, pending or expected claims against said property, money borrowed against said property and the like.
12. *Notes Payable.* Outstanding notes payable executed by either party to this lawsuit.

13. *Accounts Payable.* Books, records, documents and instruments pertaining to debts and liabilities owed by either party to this lawsuit, including, but not limited to, open accounts, notes, mortgages and liens, pledges, payment books and records.
14. *Telephone Logs and Bills.* Telephone, cellular phone, and long distance statements and bills and logs for telephone numbers by either party to this lawsuit and/or subject to their control.
15. *Monthly Expenses.* Documents reflecting monthly expenses of either party to this lawsuit, whether paid monthly or otherwise, including without limitation house payments, rent, real property taxes, utilities (gas, electric, water, garbage), groceries and household items, meals away from home, medical or hospitalization expenses, dental orthodontic expenses, pharmaceutical expenses, laundry and dry cleaning, car and vehicle payments, gasoline, vehicle maintenance and repair, other transportation costs and expenses, clothing, insurance (e.g., life, home, fire and casualty, health, hospitalization, medical, dental, automobile, personal liability), haircuts, dues and donations, entertainment, allowances, school lunches, children's lessons, child support, alimony, monthly expenses or payments in reference to investments, professional fees or charges (e.g., lawyer, CPA, etc.), and other expenses or costs.
16. *Proposed Support Decision.* Financial information statement or other listing of your monthly income and/or expenses, prepared by you or any person on your behalf, including without limitation any listing of fixed monthly expenses and any list of other personal expenses.
17. *Credit Card and Charge Accounts.* Statements, receipts, and other documents pertaining to charges and payments on credit card and/or charge accounts held in the name of either party to this lawsuit, and/or accounts over which either party has signatory authority.
18. *Federal and State Income Tax Returns.* Personal federal and state income tax returns filed by or on behalf of either party to this lawsuit, including without limitation accompanying schedules and attachments, documents used in connection with the preparation of such returns (which are not already produced in response to another category herein), communications to and from the Internal Revenue Service relating to any filed or to be filed return, records of tax prepayments made by either party to this lawsuit for the any non-filed return, and any worksheets of estimated taxes prepared by or on behalf of either party to this lawsuit for any non-filed return.

19. *Deductions or Withholdings From, or Attributable to, Income.* Documents pertaining to any deductions or withholdings from, or attributable to, any source of income of by either party to this lawsuit, including, but not limited to, income tax withheld, social security (FICA), unemployment insurance, medical or other insurance, stock options or purchase plans, retirement or pension plans, profit-sharing plans, savings plans, repayment of debts and the like.
20. *Financial Statements.* Personal financial statements, loan applications, proposed support decisions (as required by the Local Rules), financial information statements, charge or credit card account applications, listings of monthly income and expenses, and/or other statements of assets and liabilities of by either party to this lawsuit.
21. *Safe Deposit Box Records.* Documents pertaining to any safe deposit box held in the name of by either party to this lawsuit, alone, or jointly with other persons, or in which either party has any interest or entrance authority.
22. *Real Estate Presently Owned.* Documents pertaining to real property in which by either party to this lawsuit owns, or has owned, any interest, legal or equitable, including without limitation the following:
 1. Documents of title, including without limitation deeds, contracts for deeds, and/or contracts of purchase, sale, and/or any other conveyances;
 2. Promissory notes payable and/or receivable, mortgage documentation, amortization schedules, end-of-the-year mortgage and escrow statements, deeds of trust, liens, security agreements, and other evidence of debt secured by the property and/or owing for purchase of the property;
 3. Leases and rental agreements;
 4. Written offers to purchase or sell, including earnest money contracts;
 5. Agreements among co-owners and/or co-tenants;
 6. Probate records, if applicable;
 7. Income and expense statements, if applicable;
 8. Closing statements relating to purchase, sale, loans, and/or refinancing of said property;
 9. Written appraisals;
 10. Tax assessor appraisals and statements, and any documents used to support and/or challenge said appraisals;
 11. Title policy;
 12. Documents evidencing the source of the down payment for any real property purchased, and the location of deposit for any proceeds from any real property sold; and

13. Receipts and documents pertaining to maintenance of and/or improvements made to the property, including without limitation the source of the funds used for said maintenance and/or improvements.
23. *Real Estate Sold.* Books, records, documents and instruments pertaining to real property in which either party to this lawsuit has sold any interest, whether legal or equitable, including, but not limited to, the following:
 1. Deeds, contracts of purchase and sale and other conveyances;
 2. Notes receivable in consideration of such sale;
 3. Deeds of trust, mortgages and other security agreements securing any such notes;
 4. Agreements among co-owners relating to any such sale;
 5. Closing statements relating to purchase, borrowing and sale of any such property;
 6. Written appraisals made within three years of the date of any such sale; and
 7. Documents evidencing where the proceeds of any such sale were deposited.
24. *Life Insurance and Annuities.* Documents pertaining to annuities and policies of life insurance insuring the life of either party to this lawsuit, including without limitation documents which reflect the following:
 1. Company;
 2. Policy or annuity number;
 3. Date purchased, and source of funds used for purchase;
 4. Type of policy or annuity;
 5. Amount of coverage;
 6. Cash value, if any;
 7. Name of insured;
 8. Name of owner, if different from insured;
 9. Name of beneficiary or beneficiaries;
 10. Amount and frequency of premium payments, and documents reflecting premium payments made;
 11. Amount and date of any loan secured by the annuity or policy, if any, and the current status and balance of any such loan;
 12. Application of dividends; and
 13. Change of beneficiary forms which have been submitted, if applicable.
25. *Lease Agreements.* Documents reflecting property leased by either party to this lawsuit, including without limitation leases, lease agreements, and/or documents pertaining to security deposits.

26. *Motor Vehicles.* Documents pertaining to motor vehicles, airplanes, farm equipment, boats, trailers, recreational vehicles, motorcycles, collector's cars and vehicles, and any other mode of transportation in which either party to this lawsuit has, or has had, any interest, legal or equitable, and for each such vehicle, including without limitation the following:

1. Documents of title;
2. Bills of sale;
3. Documents referable to any loan or other amount payable which is secured by the vehicle, including without limitation notes, security instruments, payment books, amortization schedules, indicia of amount current owed, and/or records of payments made;
4. Appraisals; and
5. Written offers to sell or purchase said vehicle.

27. *Valuable Tangible Personal Property.* Documents pertaining to any items of tangible personal property having a value of over \$500.00, such as furniture, cash, coins, collections, appliances, antiques, furs, clothing, firearms, coin collections, stamp collections, heirlooms, collectibles, jewelry, painting and other artwork, and/or any other collection or collectible piece of property in which either party to this lawsuit has or has owned any interest, legal or equitable, and for each item, including without limitation documents which reflect the following:

1. Documents of title;
2. Source of payment;
3. Bills of sale;
4. Liens or other security instruments secured by said property, and payments made thereon;
5. Appraisals, including without limitation insurance appraisals; and/or
6. Offers to sell or purchase said property.

28. *Closely-Held Corporations and/or Unincorporated Business Entities.* Documents pertaining to corporations, partnerships, joint ventures, sole proprietorships, and/or other business organizations in which either party to this lawsuit owns, or has owned, any interest, legal or equitable, and for each such business entity and including without limitation (as applicable to each business entity) documents which reflect the following, and documents reflecting any amendments thereto:

1. Fully executed company agreements, membership agreements, partnership agreements, co-tenancy agreements, franchise agreements, ownership interest transfer agreements, shareholder

- agreements, brokerage agreements, stock restriction agreements, and buy-sell agreements (no time limit);
2. Monthly, quarterly, and annual balance sheets, profit and loss statements, records of retained earnings, cash flow statements, income statements and general ledgers;
 3. Financial statements prepared for the business' use and/or for submission to any lending institution and/or any other entity, and/or prepared for any other reason, including without limitation documents submitted with said financial statement;
 4. Federal and State income tax returns and franchise tax returns, along with accompanying schedules and attachments thereto;
 5. Certificates of Formation, Articles of Formation, Articles of Incorporation and/or similar organizational document and/or corporate charter (no time limit);
 6. By-Laws, and amendments thereto (no time limit);
 7. Minutes of member meetings, manager meetings, partner meetings, Board of Directors' meetings, shareholders' meetings, and minutes of any committees;
 8. Equity ownership or unit ledgers, equity ownership certificates, records of equity ownership, and the name and address of each equity owner or unit holder, along with the equity owned (no time limit);
 9. Future issues of stock and/or interest in the business, including without limitation stock options, warrants, subscription agreements, convertible securities, and/or employment contracts;
 10. The amounts of the credit lines which said business enjoys with any lending institution or individual with whom it has such credit lines, including without limitation the amount of the line of credit, the amount distributed from the line of credit, the amount owing on the line of credit, and the security proffered for the line of credit;
 11. The name, address, and office held by each officer, partner or manager of the business;
 12. Organizational charts;
 13. Sales and other transfers of interest and/or stock in said business by any owner and/or shareholder, including without limitation the names and addresses of all buyers and sellers, the amount of the interest and/or number of shares transferred, and the price paid for said transfer;
 14. Contracts entered into by said business to furnish goods or services to any person;
 15. The name, address, and principal representative of each entity;
 16. Annual reports and franchise reports;
 17. End-of-the-year summaries;
 18. Deed records of real property owned in whole or in part by said business, and documents pertaining to debts secured by said property;

19. Leases, records of leasehold improvements, records of lease payments, records of fair rental value, and records of marketing of leased space;
 20. Property inventories and depreciation schedules;
 21. Bank statements, canceled checks, receipts, deposit slips, Quicken or Quickbook reports, and other documents pertaining to any account in a financial institution held by or on behalf of the business;
 22. Employment, management or other services contracts, including without limitation any employment contracts between either party to this lawsuit and the business;
 23. Aged accounts receivable and accounts payable records, including cash receipt books and/or ledgers;
 24. Prospectuses or other writings used in connection with any public or other offerings, or internal proposals within the business to make public offerings of the business or any component thereof;
 25. The capitalization of the business, and the source thereof;
 26. Salaries, bonuses, dividends, distributions, and/or any other amounts paid by the business to each employee, owner, and/or shareholder;
 27. The fair market value of the business;
 28. Records of indebtedness, including guarantees, owed by the business or capital calls or other obligations owed by the owners referable to the business;
 29. Charge card statements and details for any charge account or charge card held in whole or in part in the name of the business;
 30. Lawsuits and litigation in which the business is involved or any property of the business is involved; and
 31. Any records of cash payments and/or cashless transactions not reflected on the books of the business.
29. *Property Held in Trust or Custodial Held Accounts.* Documents pertaining to any property or accounts being held custodial or held by any person in trust for either party to this lawsuit as trustee or custodian, and for each such trust or custodial account, including without limitation documents reflecting the following:
1. The location of such trust and/or property;
 2. A description of such trust and/or property;
 3. The name and address of the trustee, custodian and/or the person holding such property;
 4. The current value of such property;
 5. Withdrawals and/or distributions from said trust or custodial account;
 6. Financial institution statements for any trust or custodial account held in a financial institution and/or custodial accounts;
 7. Trust agreements and amendments thereto or similar governing documents;

8. Assets and values of assets owned by the trust;
 9. Debts and liabilities, and the amount thereof, owed by the trust, and the property secured therefore;
 10. Income received by the trust, and distributions made therefrom;
 11. State and federal income tax returns prepared by or on behalf of the trust, including without limitation all accompanying schedules and attachments thereto;
 12. Inter vivos trusts;
 13. Whether the trust or similar other relationship is revocable or irrevocable; and
 14. Charge card statements and details for any charge card or credit card held in whole or in part in the name of the trust and/or custodial account.
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30. *Other Property of Children.* Documents which pertain to any property (other than trusts) owned by any of your children, including without limitation documents which reflect a description, proof of ownership, value, any pledged security interest, and the trustee or custodian of said property.
 31. *Mineral and/or Oil and Gas Rights.* Documents pertaining to any interest held by or on behalf of either party to this lawsuit in any mineral leases, mineral rights, oil and gas leases, oil and gas rights, oil and gas royalties, mineral royalties, drilling rights, and/or any other activity relating to the ownership and/or production of mineral and/or oil and gas interests.
 32. *Livestock and Pets.* Documents pertaining to livestock and/or pets in which either party to this lawsuit owns an interest.
 33. *Clubs and Organizations.* Membership certificates, statements, and/or other documents pertaining to any membership of either party to this lawsuit in any club, association, frequent flyer and/or other mileage or hotel club, country club, and/or any other organization, including without limitation statements of privileges, accrued benefits, and/or other benefits received by ownership of membership in said club.
 34. *Separate Property.* Documents which support your claims of separate property (including the inception of title and all tracing evidence), regardless of whether these documents have been produced in response to any other request for production herein, and for each separate property claim, including without limitation documents which reflect the following (no time limit):
 1. Identification of each piece of alleged separate property;
 2. When and how each piece of property was obtained by you;
 3. The basis of your separate property claim(s);

4. The value of said property; and
 5. The source of the funds used to purchase said property, if applicable.
35. *Separate Property of Responding Party.* Documents pertaining to any claims you have, if any, that any pieces of property claimed by you as your separate property are not the separate property of requesting party or community property, regardless of whether these documents have been produced in response to other requests for production herein (no time limit).
36. *Reimbursement Claims.* Documents pertaining to any reimbursement claims you may have against the community estate and/or against the separate estate of Requesting Party, if any, regardless of whether such documents have been produced in response to other requests for production herein, and for each such claim, including without limitation documents which reflect the value and description of the claim, and the legal and factual basis of the claim (no time limit).
37. *Marital Property Agreements and Prenuptial Agreements.* Original marital property agreements and/or Prenuptial Agreements prepared by, executed by, or prepared on behalf of either party to this lawsuit, and including without limitation all drafts, correspondence, memoranda, notes, underlying documentation, written disclosures, post-agreement affirmations, records of litigation upholding or overturning said agreements, and bills from and records of payments to any attorney or other professional which pertain to the drafting and/or execution of said agreements.
38. *Health and Dental Insurance.* Health and dental insurance policies, plan descriptions, statements of benefits, premiums owing and/or paid (if not a payroll deduction), billing statements, correspondence, explanations of coverage, reimbursements paid, records of uninsured expenses, the effective dates of any policies in effect, any policies available but not yet enrolled in, applications submitted (whether accepted or not), policies offered through either party to this lawsuit's employment (whether enrolled or not), and other documents pertaining to health insurance policies insuring, or available to insure either party.
39. *Fire and Casualty Insurance.* Policies of fire and casualty insurance insuring real or personal property owned by either party to this lawsuit, and including without limitation claims made and/or paid on said policies, inventories of property submitted to the insurance company and/or used in connection with the acquisition and/or renewal of said policy, and/or premiums owing and/or paid.

40. *Personal Injury or Property Damage Claims or Awards.* Documents pertaining to personal injury and/or property claims and/or awards by either party to this lawsuit, whether the claim has been prosecuted or the suit filed, and whether or not the suit or claim is pending or has been settled, and whether or not monies have actually been received, in whole or in part, and for each such claim, including without limitation documents reflecting the following:
1. Pleadings filed with the Court referable to any such claims;
 2. Correspondence between each party to this lawsuit and/or their representatives, and the person against whom the claim is sought;
 3. The nature and extent of the claim;
 4. Compensation received or owing as a result of the claim;
 5. The settlement of the claim, whether adjudged in court or not, and the terms and conditions thereto;
 6. The location of the deposit and/or disposition of any proceeds from any such claim; and
 7. The attorney(s) representing responding party, and billing statements, notes, correspondence, memoranda, records of meetings and settlement negotiations, and other documents received from said attorneys or provided to said attorneys by responding party.
41. *Litigation.* Except for documents pertaining to this cause, documents pertaining to any lawsuits, civil actions, bankruptcy proceedings, claims, and/or other litigation in which either party to this lawsuit, and/or any entity in which either party to this lawsuit has or has had any interest has been a party, and for each such claim, including without limitation documents reflecting the following:
1. The cause number and style of the case;
 2. The names of all parties; and
 3. The nature and disposition of the action.
42. *Criminal Charges and Actions.* Documents pertaining to any criminal charges, investigations, allegations, complaints, and convictions of either party to this lawsuit other than minor traffic violations, including without limitation all records of suspect, arrest, formal charges, and disposition.
43. *Gifts and Loans to Others by Responding Party.* Documents reflecting gifts and/or loans of any kind made by you to any person other than Requesting Party, including without limitation documents reflecting the date of each such gift, the amount of each such gift, expenditures made by you for the entertainment of another person, travel with another person, gifts to another

person, loans to another person, and/or dinners and/or parties for or on behalf of any other person other than Requesting Party.

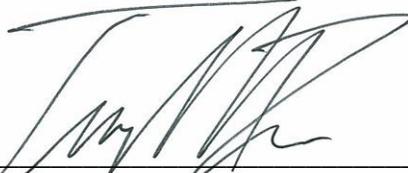
44. *Education.* Documents pertaining to yours, or any of your children's educational training, status, and progress, including without limitation formal or informal schooling, tutoring, counseling, and continuing education, whether public or private education, and including without limitation admittance applications, transcripts, report cards, school records, evaluations, test scores, course attendance and completion certificates, and disciplinary reports.
45. *Religion.* If you believe religion is a relevant issue in this cause, documents pertaining to your and/or the children's religious training and activities, whether formal or informal, including without limitation religious beliefs, activities, church, church affiliations, religious holidays, and religious ceremonies.
46. *Videotapes, Audiotapes, and Other Documentary Evidence.* The originals of videotapes, audio tapes, photographs, computer images and/or files, and/or other documents relevant to any issue in this cause, including out-takes therefrom, which videotapes, audio tapes, photographs, computer images and/or files, and/or other documents depict and/or record either party to this lawsuit, any property owned by either party to this lawsuit, and/or any person listed in response to any request for disclosure propounded to Responding Party.
47. *Letters and/or Written Memoranda.* Letters and/or written memoranda between you, Requesting Party, and/or any person listed in response to any request for disclosure and/or interrogatory propounded to Responding Party, and/or any other person, which are relevant to any issue in this cause.
48. *Expert Witness Reports.* Reports, statements, notes, memoranda, correspondence, billing statements, records of payments, underlying documentation, references and resources, and/or any other documents relevant to this cause which are contained in any file of, or held by, any potential expert witness in this case working for or on behalf of Responding Party.
49. *Legal and Expert Witness Fees.* Documents pertaining to the employment by you or on your behalf, attorneys, C.P.A.s, accountants, appraisers, actuaries, and/or other professionals in reference to this cause of action, including without limitation employment contracts, fee contracts, bills forwarded to you by said professional, records of payments made to said professional by you or

on your behalf, and/or timeslips prepared by said professional and/or his or her staff.

50. *Mental Health.* Documents pertaining to your mental health, from the date of the marriage, through the present date, including without limitation psychiatric, psychological, psychotherapy, emotional, substance abuse, learning disability, or mental health counseling, and for each occurrence, including without limitation mental health bills, pharmaceutical records, reports, raw data, test results, diagnoses, prognoses, treatment notes, recommendations, referrals, findings, charts, files, records, and records of payment to any mental health professional.
51. *Diaries and/or Journals.* Diaries, personal records, logs, journals, and/or other writings by you, whether private or presented to another person, pertaining to any issue relevant in this cause.
52. *Surveillance Items and Reports.* Documents pertaining to, reflecting, or making comments concerning, any type of surveillance and/or investigation of Requesting Party at any time, whether or not such surveillance or investigation was conducted by a licensed private investigator or any other person (licensed or unlicensed), and whether or not such surveillance or investigation was made at your request or at the request of anyone acting on behalf of you (directly or indirectly), and including without limitation reports, tape recordings, videotape recordings, photographs, records of observations, memoranda, correspondence, billing statements, records of payments made to an investigator, documents provided to the investigator, and/or any other documents or tangible things which arise from any such investigation.
53. *Calendars.* Your personal and business calendars, appointment books, and/or any other documents relating to the schedule, activities, and/or appointments of either party to this lawsuit.
54. *Documents Used in Preparation of Answers to Interrogatories and Requests for Disclosure.* Documents used by you in preparing your answers to interrogatories and/or your responses to the request for disclosure in this cause, which are not already produced in response to other requests for production herein.
55. *Email Correspondence, text messages, tweets, Facebook, LinkedIn, or other social media.* Any social media communications between you and Requesting Party and between you and other persons via email transmission, including deleted emails, or of an electronic nature during the past 12 months regarding or pertaining to the parties, the marriage, parent-child issues, or the property of either party, your travel plans or itineraries, your gifts or

transfer of monies or property to any other person or entity, and or any romantic or sexual relationship you have had with any person other than Requesting Party.

Respectfully submitted,

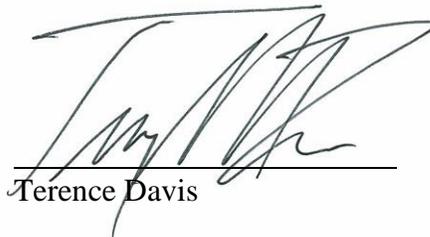


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ATTORNEY FOR REQUESTING PARTY

CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the foregoing instrument has been served in accordance with the Texas Rules of Civil Procedure as indicated below on this 26th day of April 2019:



Terence Davis