

CAUSE NO. 19-7298-367

ROBERT OBLON,	§	IN THE DISTRICT COURT OF
	§	
Plaintiff,	§	
	§	
v.	§	DENTON COUNTY, TEXAS
	§	
JORDAN BROCK,	§	
	§	
Defendant.	§	367 <sup>TH</sup> JUDICIAL DISTRICT

**DEFENDANT’S NOTICE OF FILING NON-PARTY DISCOVERY REQUEST**

Defendant Jordan Brock hereby gives notice of filing the attached Request for Production of Documents to the Custodian of Non-Party Sharing Services Global Corporation.

Respectfully submitted,

By: /s/ Andrew P. Speicher

Michael G. Brown  
State Bar No. 03153800  
mike.brown@figdav.com  
Andrew P. Speicher  
State Bar No. 24027878  
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FIGARI + DAVENPORT, LLP  
901 Main Street, Suite 3400  
Dallas, TX 75202  
Tel: 214.939.2000  
Fax: 214.939.2090

ATTORNEYS FOR DEFENDANT  
JORDAN BROCK

**CERTIFICATE OF SERVICE**

On the 26th day of August, 2019, the foregoing instrument was served via efile.txcourts.gov on Howard J. Klatsky (hklatsky@feesmith.com), Fee, Smith, Sharp & Vitullo, L.L.P., Three Galleria Tower, 13155 Noel Road., Suite 1000, Dallas, Texas 75240.

/s/ Andrew P. Speicher  
Andrew P. Speicher

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**DEFENDANT’S REQUEST FOR PRODUCTION OF DOCUMENTS  
TO THE CUSTODIAN OF RECORDS OF NON-PARTY  
SHARING SERVICES GLOBAL CORPORATION**

TO: Custodian of Records for Sharing Services Global Corporation, 1700 Coit Road, Plano, Texas 75075; and

Plaintiff, by and through his attorneys of record, Howard J. Klatsky, Fee, Smith, Sharp & Vitullo, L.L.P., Three Galleria Tower, 13155 Noel Road., Suite 1000, Dallas, Texas 75240.

PLEASE TAKE NOTICE that, pursuant to Texas Rule of Civil Procedure 205, Defendant Jordan Brock requests, and will compel by subpoena duces tecum if necessary, that Sharing Services Global Corporation, a nonparty in the above-captioned cause, produce all records identified in Exhibit A attached hereto, at the offices of Figari + Davenport, 901 Main Street, Suite 3400, Dallas, Texas 75202, on Wednesday, August 28, 2019, at 10:00 am. In lieu of originals, exact duplicates may be produced. Defendant, however, reserves the right to inspect the original documents.

Respectfully submitted,

By: /s/ Andrew P. Speicher

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/s/ Andrew P. Speicher  
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## EXHIBIT A

### I. DEFINITIONS

1. *Oblon* shall mean or refer to Plaintiff Robert Oblon.
2. *Sharing Services Global Corporation* shall mean and refer to Sharing Services Global Corporation and its former name, Sharing Services, Inc., and their officer, employees, attorneys and agents.
3. *Document* shall mean any kind of written, recorded, or graphic matter, however produced or reproduced, of any kind or description, whether sent or received, or neither, including originals, nonidentical copies (whether different from the originals because of marginal notes, or other material inserted therein or attached thereto, or otherwise), drafts and both sides thereof, and including but not limited to: papers; books; letters; correspondence; emails; electronic data; work papers; transcripts; minutes; reports and recordings of telephone and other conversations or other interviews, or of conferences or other meetings; affidavits; statements; summaries; opinions; reports; studies; analyses; evaluations; contracts; agreements; ledgers; journals; statistical records; desk calendars; appointment books; diaries; lists; tabulations; sound recordings; computer printouts; data processing records; microfilm or microfiche; photographs; maps; charts; accounts; financial statements and reports thereof; all records kept by electronic, photographic, or mechanical means; electronic mail or e-mail; and things similar to any of the foregoing, however denominated.

## **II. DOCUMENTS REQUESTED**

1. The Contractor Agreement dated April 12, 2018, between Oblon and Sharing Services Global Corporation and any amendments thereto.
2. The “Founder’s Agreement” and any amendments thereto between Oblon and Sharing Services Global Corporation.
3. All settlement agreements and any amendments thereto between Oblon and Sharing Services Global Corporation.
4. All communications between Oblon and Sharing Service Global Corporation concerning any alleged default, breach or violation of the April 12, 2018 Contractor Agreement, any “Founder’s Agreement,” or a settlement agreement between Oblon and Sharing Services Global Corporation.
5. All affidavits made by Oblon that relate to Alchemist Holdings, LLC’s stock ownership of Sharing Services Global Corporation.
6. Provide the attached Affidavit (1) completed with the correct number of pages being produced, dated, and signed along with the documents responsive to the preceding requests; or (2) in the event you have no documents responsive to the preceding requests, the attached Affidavit completed with number of pages as zero, dated, and signed.  
  
***Please note*** that the Affidavit must be notarized.

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§ 367<sup>TH</sup> JUDICIAL DISTRICT

**AFFIDAVIT**

Before me, the undersigned authority, personally appeared \_\_\_\_\_ who, being by me duly sworn, deposed as followed:

My name is \_\_\_\_\_. I am of sound mind, capable of making this affidavit, and personally acquainted with the facts stated herein.

I am a custodian of records for Sharing Services Global Corporation. Attached hereto are \_\_\_\_\_ pages of records from Sharing Services Global Corporation. These \_\_\_\_\_ said pages of records are kept by Sharing Services Global Corporation in the regular course of business, and it was the regular course of business of Sharing Services Global Corporation for an employee or representative of Sharing Services Global Corporation, with knowledge of the act, event, condition, opinion, or diagnosis recorded to make the record or to transmit information thereof to be included in such record; and the record was made at or near the time or reasonably soon thereafter. The records attached hereto are the original or exact duplicates of the original.

\_\_\_\_\_  
Custodian of Records  
Sharing Services Global Corporation

SWORN TO AND SUBSCRIBED before me, on the \_\_\_\_\_ day of \_\_\_\_\_, 2019.

\_\_\_\_\_  
Notary Public, State of Texas

My commission expires: \_\_\_\_\_