

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA
PHILADELPHIA**

MARC BRAGG, Esq., an individual,

CIVIL DIVISION

Plaintiff,

No. 06-cv-4925

v.

JUDGE EDUARDO ROBRENO

LINDEN RESEARCH, INC., a corporation,
and PHILIP ROSEDALE, an individual,

Defendants.

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION OF DOCUMENTS AND
THINGS DIRECTED TO DEFENDANT LINDEN RESEARCH, INC.**

AND NOW COMES, Plaintiff, Marc Bragg, Esq., by and through counsel, Jason A. Archinaco, Esq., and the law firm of WHITE AND WILLIAMS, LLP, and serves Plaintiff's First Requests for Production of Documents and Things Directed to Defendant Linden Research, Inc. Pursuant to the Federal Rules of Civil Procedure, you are required to answer the following Requests for Production of Documents and Things within thirty (30) days of receipt.

INSTRUCTIONS AND DEFINITIONS

1. Document(s), when used herein, shall be used in its broadest sense and shall mean and include any and all written, recorded, graphic or tangible matter, whether produced by hand, recorded, or reproduced or whether electronically produced or reproduced and, without limiting the generality of the foregoing, shall include all correspondence, memoranda (whether external or internal), records, reports, graphs, brochures, technical data, contracts, agreements, diagrams, maps, accounting records, accounting ledgers, financial statements, financial journals, check records, checks, tax records, photographs, films, telegrams, specifications of every sort, manuals, papers, letters, notes, notations, telephone messages, notebooks, minutes or summaries of

meetings, schedules, transcripts, diaries, publications, directives, instructions, computations, purchase orders, tabulations, invoices, bills, credit memos, receipts, mortgage or related documents, testing records, laboratory reports, bills of lading, sketches, computer printouts, published sales aids, blueprints, plans, design drawings, product brochures, sales literature, records of shipment, advertisements, test films, laboratory notebooks, quality control tests, production records and any drafts, revisions or amendments or copies of the above that are within the knowledge, possession, custody, control or subject to the control of Defendant Linden Research, Inc., its representatives, agents or counsel. Data of all sorts on a computer or on a disc wherever located in whatsoever form is specifically encompassed within this Request and Definition.

2. In producing documents, please specify the paragraph to which such documents relate.

3. For each such document otherwise falling within this Request which Defendant contends is excludable for whatever reason from discovery, please note with any objection to production the following:

- a) The date of the document;
- b) Its general nature (e.g., letter, memorandum, test results, etc.);
- c) The name(s) of the author(s);
- d) The name(s) of the recipient(s) of the document and of any drafts or copies thereof;
- e) The person(s) having present custody of the document;
- f) The basis for any such claim of privilege or other asserted basis to avoid production of the document.

**PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS
DIRECTED TO DEFENDANT LINDEN RESEARCH, INC.**

1. Produce all documents identified in your Rule 26(a) Disclosures.

RESPONSE:

2. Produce all complete, unedited chat logs referenced in Defendant Linden's counterclaim.

RESPONSE:

3. Produce all document retention policies of Defendant Linden.

RESPONSE:

4. Produce all documents supporting any claims for damages raised in Defendant Linden's counterclaim.

RESPONSE:

5. Produce a privilege log of any documents not produced or withheld from your response to Plaintiff's Request for Production of Documents and Things Directed to Defendant Linden Research, Inc.

RESPONSE:

Dated: July 23, 2007

WHITE AND WILLIAMS, LLP

By 

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