

U S DISTRICT &
BANKRUPTCY COURTS

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FILED CIVIL DISTRICT IDAHO
Clerk of Court

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Gregory C. Tollefson, ISB No. 5643
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Attorneys for Defendant Micron Electronics, Inc.

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF IDAHO

KIMBERLEY SMITH, MICHAEL B.
HINCKLEY, JACQUELINE T.
HLADUN, MARILYN J. CRAIG,
JEFFERY P. CLEVINGER, and
TIMOTHY C. KAUFMANN, individually
and on behalf of those similarly situated,

Plaintiffs,

vs.

MICRON ELECTRONICS, INC., a
Minnesota corporation,

Defendant.

Case No. CIV 01-0244-S-BLW

**AFFIDAVIT OF GREGORY C.
TOLLEFSON IN SUPPORT OF
DEFENDANT MICRON ELECTRONICS,
INC.'S MOTION FOR PROTECTIVE
ORDER OR, IN THE ALTERNATIVE,
MOTION FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFFS' SIXTH
SET OF REQUESTS FOR PRODUCTION
OF DOCUMENTS**

ORIGINAL

**AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT
MICRON ELECTRONICS, INC.'S MOTION FOR PROTECTIVE ORDER OR, IN THE
ALTERNATIVE, MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS - 1**

251

STATE OF IDAHO)
) ss.
County of Ada)

I, Gregory C. Tollefson, being duly sworn, depose and say:

1. I am an attorney at Steel Rives LLP and counsel of record for Defendant Micron Electronics, Inc. I am familiar with this case and make this affidavit based on my personal knowledge. I submit this affidavit in support of Defendant Micron Electronics, Inc.'s Motion for Protective Order or, in the Alternative, Motion for Extension of Time to Respond to Plaintiffs' Sixth Set of Requests for Production of Documents.

2. On July 7, 2004, Defendant received Plaintiffs' Sixth Set of Requests for Production of Documents via hand delivery. The discovery included five hundred and forty-five (545) requests for production of documents. A true and correct copy of Plaintiffs' Sixth Set of Requests for Production of Documents is attached hereto as **Exhibit A**.

3. After reviewing the discovery requests, on July 20, 2004, Kim Dockstader sent a letter to the offices of Huntley Park LLP, informing Plaintiffs' counsel that the deadline for completion of discovery was May 3, 2004. A true and correct copy of the correspondence is attached hereto as **Exhibit B**.

4. On July 22, 2004, Dan Williams responded to Kim Dockstader's letter, indicating Plaintiffs' Sixth Set of Requests for Production of Documents does not deal with certification issues but damages information, which Plaintiffs need in order to adhere to the deadline for disclosure of experts. A true and correct copy of the correspondence is attached hereto as **Exhibit C**.

**AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT
MICRON ELECTRONICS, INC.'S MOTION FOR PROTECTIVE ORDER OR, IN THE
ALTERNATIVE, MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS - 2**

5. Kim Dockstader responded to Dan Williams' letter on July 29, 2004, stating Defendant's position is that there is no foundation for discovery related to non-class certification issues and that Defendant would agree to allow Plaintiffs to move out their deadline for expert disclosures. A true and correct copy of the correspondence is attached hereto as **Exhibit D**.

6. On August 2, 2004, Dan Williams responded to Kim Dockstader's letter, disagreeing with Defendant's suggestion that Plaintiffs move out their deadline for expert disclosures and insisting Defendant produce the documents as soon as possible. A true and correct copy of the correspondence is attached hereto as **Exhibit E**.

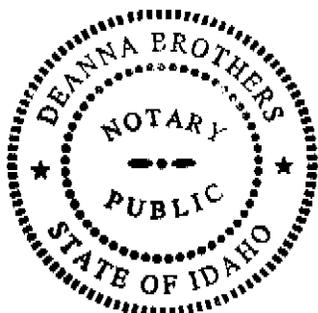
7. Defense counsel attempted to contact Plaintiffs' counsel numerous times this afternoon regarding issues related to this motion but were unsuccessful.

Dated this 6th day of August, 2004.



Gregory C. Tollefson

SUBSCRIBED AND SWORN TO BEFORE ME this 6th day of August, 2004.





Notary Public of Idaho
Residing at: Boise, Idaho
My Commission Expires: 08/19/06

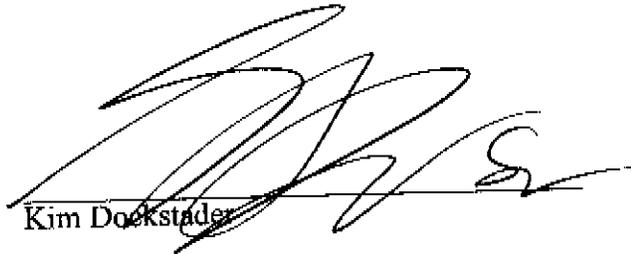
**AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT
MICRON ELECTRONICS, INC.'S MOTION FOR PROTECTIVE ORDER OR, IN THE
ALTERNATIVE, MOTION FOR EXTENSION OF TIME TO RESPOND TO
PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS - 3**

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 6th day of August, 2004, I caused to be served a true copy of the foregoing **AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT MICRON ELECTRONICS, INC.'S MOTION FOR PROTECTIVE ORDER OR, IN THE ALTERNATIVE, MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS** by the method indicated below, addressed to the following:

William H. Thomas
Daniel E. Williams
Christopher F. Huntley
HUNTLEY PARK LLP
250 South Fifth Street
PO Box 2188
Boise, Idaho 83701-2188
Fax: 208 345 7894

- Via U. S. Mail
- Via Hand-Delivery
- Via Overnight Delivery
- Via Facsimile


Kim Dockstader

AFFIDAVIT OF GREGORY C. TOLLEFSON IN SUPPORT OF DEFENDANT MICRON ELECTRONICS, INC.'S MOTION FOR PROTECTIVE ORDER OR, IN THE ALTERNATIVE, MOTION FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' SIXTH SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS - 4

EXHIBIT A

JUL 07 2004

WILLIAM H. THOMAS (ISB 3154)
 DANIEL E. WILLIAMS (ISB 3920)
 CHRISTOPHER F. HUNTLEY (ISB 6056)
 HUNTLEY PARK, THOMAS, BURKETT,
 OLSEN & WILLIAMS
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 Telephone: (208) 345-7800
 Fax: (208) 345-7894
wmthomas@huntleypark.com
danw@huntleypark.com
chuntley@huntleypark.com

Attorneys for Plaintiffs

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

KIMBERLEY SMITH, MICHAEL)
 B. HINCKLEY, JACQUELINE T.)
 HLADUN, MARILYN J. CRAIG,)
 JEFFERY P. CLEVINGER, and)
 TIMOTHY C. KAUFMANN,)
 individually and on behalf)
 of those similarly situated,)
)
 Plaintiffs,)
)
 vs.)
)
 MICRON ELECTRONICS, INC., a)
 Minnesota corporation,)
)
 Defendant.)
)

Case No. CIV 01-0244-S

PLAINTIFFS' SIXTH SET OF
REQUESTS FOR PRODUCTION
OF DOCUMENTS

TO: DEFENDANT AND ITS ATTORNEYS OF RECORD

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiffs request that defendant produce copies of the following designated documents at the offices of Huntley Park,

LLP, 250 South Fifth St., Suite 660, Boise, Idaho, within thirty (30) days of service of these Requests upon you. Plaintiff specifically requests electronic production of all documents stored in an electronic format in such electronic format.

DEFINITIONS AND PRELIMINARY STATEMENT

1. "Document" includes, but is not limited to, every form of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds or symbols, or combinations thereof, whether recorded by handwriting, printing, photostatic or photographic means, magnetic impulse, tape, computer disk, CD ROM, optical disk, or any other form of data storage, data compilation, or mechanical or electronic recording, and all other tangible things which come within the meaning of "writing" contained in Rule 1001 of the Federal Rules of Evidence, or within the meaning of "document" or "tangible thing" contained in Rule 34 of the Federal rules of Civil Procedure. Every draft or non-identical copy of a document is a separate document as that term is used herein, such as, but not limited to, copies containing notations, insertions, corrections, marginal notes or any other variations.

2. "Electronic Data" means the original and any non-identical copies of any computer program, software, database, file, e-mail, source code or operating system, including ASCII files, work processing documents, spreadsheets, charts, graphs and emails, whether active, deleted or fragmented.

3. "Electronic Media" includes any magnetic or other storage device used to record, store, or maintain "Electronic Data" including, but not limited to, computer hard disks, floppy disks, CD ROM, magnetic tapes, microfiche, punched cards and computer chips.

4. "Electronic Memory" means any disk, minidisk, floppy disk, hard drive, disk drive,

CD ROM, optical disk, memory card, personal computer, network, magnetic tape, back up, or any other means of storing, recording or retaining information generated or input to or on a computer.

5. Metadata for any electronic copy shall be deemed part of any document and shall be produced with the electronic copy of that document.

6. This request includes all Documents in your possession or under your control including, but not limited to, documents in the possession of your attorneys, accountants, investigators, or other agents or persons from whom you have a legal right to obtain such Document.

7. All of the requests herein are deemed continuing. If, after responding to this request, defendants acquire any Documents requested herein, or any information related to any Document herein, which is not reflected by any Documents produced or any response to these requests, you must file a supplemental response or indicate to counsel for plaintiff of the existence of such Documents. Such supplementation is required by the Federal Rules of Civil Procedure.

8. If any Document or portion thereof which is responsive to any request herein is or will be withheld from production, inspection or copying (whether because it is claimed to be work product, communication from attorney to client, or is entitled to be withheld for any other reason), please fully identify such Document or portion thereof in your response and fully state in your response the reason it is or will be withheld. In addition, if any Document is practically impossible of production, inspection or copying, please fully identify such Document and the reason for the practical impossibility.

9. "Defendant" as used herein shall include Micron Electronics, Inc., and any and all of

its parents, subsidiaries and/or sister organizations whether incorporated as separate entities or treated as organizational sub-groups, business segments, or divisions of Micron Electronics, Inc. The term shall not include Micron Technology, Inc.

10. Unless otherwise specifically set forth in the request for production, the requests in this 6th Request for Production shall be limited to the period June 1, 1998 to June 1, 2001.

BURDENSOME

Furthermore, if, in responding to these requests, you object to the discovery as "burdensome," please state in your response an explanation of the burden which you perceive would be imposed upon the Defendant in making the response.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Laura Anderson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 2.: Please produce copies of all records pertaining to commissions or incentives paid to Laura Anderson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 3.: Please produce all records of the entry or departure of Laura Anderson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 4.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Laura Anderson's employment with

Defendant.

REQUEST FOR PRODUCTION NO. 5.: Please produce copies of all e-mails pertaining to or sent to or from Laura Anderson during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 6.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Laura Anderson during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 7.: Please produce the personnel file for Laura Anderson for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 8.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael Angus during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 9.: Please produce copies of all records pertaining to commissions or incentives paid to Michael Angus during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 10.: Please produce all records of the entry or departure of Michael Angus from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 11.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Michael Angus's employment with Defendant.

REQUEST FOR PRODUCTION NO. 12.: Please produce copies of all e-mails pertaining to or sent to or from Michael Angus during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 13.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael Angus during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 14.: Please produce the personnel file for Michael Angus for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 15.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Ryan Ball during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 16.: Please produce copies of all records pertaining to commissions or incentives paid to Ryan Ball during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 17.: Please produce all records of the entry or departure of Ryan Ball from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 18.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Ryan Ball's employment with Defendant.

REQUEST FOR PRODUCTION NO. 19.: Please produce copies of all e-mails pertaining to or sent to or from Ryan Ball during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 20.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Ryan Ball during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 21.: Please produce the personnel file for Ryan Ball for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 22.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Destiny J. Baxter during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 23.: Please produce copies of all records pertaining to commissions or incentives paid to Destiny J. Baxter during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 24.: Please produce all records of the entry or departure of Destiny J. Baxter from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 25.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Destiny J. Baxter's employment with Defendant.

REQUEST FOR PRODUCTION NO. 26.: Please produce copies of all e-mails pertaining to or sent to or from Destiny J. Baxter during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 27.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Destiny J. Baxter during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 28.: Please produce the personnel file for Destiny J. Baxter for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 29.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Stephanie Bistline during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 30.: Please produce copies of all records pertaining to commissions or incentives paid to Stephanie Bistline during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 31.: Please produce all records of the entry or departure of Stephanie Bistline from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 32.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Stephanie Bistline's employment with Defendant.

REQUEST FOR PRODUCTION NO. 33.: Please produce copies of all e-mails pertaining to or sent to or from Stephanie Bistline during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 34.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Stephanie Bistline during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 35.: Please produce the personnel file for Stephanie Bistline for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 36.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by David Blair during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 37.: Please produce copies of all records pertaining to commissions or incentives paid to David Blair during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 38.: Please produce all records of the entry or departure of David Blair from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 39.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to David Blair's employment with Defendant.

REQUEST FOR PRODUCTION NO. 40.: Please produce copies of all e-mails pertaining to or sent to or from David Blair during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 41.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from David Blair during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 42.: Please produce the personnel file for David Blair for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 43.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Heidi M. Brady during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 44.: Please produce copies of all records pertaining to commissions or incentives paid to Heidi M. Brady during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 45.: Please produce all records of the entry or departure of Heidi M. Brady from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 46.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Heidi M. Brady's employment with Defendant.

REQUEST FOR PRODUCTION NO. 47.: Please produce copies of all e-mails pertaining to or sent to or from Heidi M. Brady during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 48.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Heidi M. Brady during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 49.: Please produce the personnel file for Heidi M. Brady for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 50.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by William Todd Brinkerhoff during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 51.: Please produce copies of all records pertaining to commissions or incentives paid to William Todd Brinkerhoff during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 52.: Please produce all records of the entry or departure of William Todd Brinkerhoff from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 53.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to William Todd Brinkerhoff's employment with Defendant.

REQUEST FOR PRODUCTION NO. 54.: Please produce copies of all e-mails pertaining to or sent to or from William Todd Brinkerhoff during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 55.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from William Todd Brinkerhoff during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 56.: Please produce the personnel file for William Todd Brinkerhoff for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 57.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael Browning during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 58.: Please produce copies of all records pertaining to commissions or incentives paid to Michael Browning during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 59.: Please produce all records of the entry or departure of Michael Browning from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 60.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Michael Browning's employment with Defendant.

REQUEST FOR PRODUCTION NO. 61.: Please produce copies of all e-mails pertaining to or sent to or from Michael Browning during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 62.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael Browning during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 63.: Please produce the personnel file for Michael Browning for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 64.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by John Caprai during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 65.: Please produce copies of all records pertaining to commissions or incentives paid to John Caprai during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 66.: Please produce all records of the entry or departure of John Caprai from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 67.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to John Caprai's employment with Defendant.

REQUEST FOR PRODUCTION NO. 68.: Please produce copies of all e-mails pertaining to or sent to or from John Caprai during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 69.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from John Caprai during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 70.: Please produce the personnel file for John Caprai for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 71.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Dennis Christensen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 72.: Please produce copies of all records pertaining to commissions or incentives paid to Dennis Christensen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 73.: Please produce all records of the entry or departure of Dennis Christensen from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 74.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Dennis Christensen's employment with Defendant.

REQUEST FOR PRODUCTION NO. 75.: Please produce copies of all e-mails pertaining to or sent to or from Dennis Christensen during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 76.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Dennis Christensen during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 77.: Please produce the personnel file for Dennis Christensen for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 78.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Alan C. Clafin during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 79.: Please produce copies of all records pertaining to commissions or incentives paid to Alan C. Clafin during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 80.: Please produce all records of the entry or departure of Alan C. Clafin from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 81.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Alan C. Clafin's employment with Defendant.

REQUEST FOR PRODUCTION NO. 82.: Please produce copies of all e-mails pertaining to or sent to or from Alan C. Claflin during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 83.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Alan C. Claflin during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 84.: Please produce the personnel file for Alan C. Claflin for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 85.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Jeffery P. Clevenger during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 86.: Please produce copies of all records pertaining to commissions or incentives paid to Jeffery P. Clevenger during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 87.: Please produce all records of the entry or departure of Jeffery P. Clevenger from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 88.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Jeffery P. Clevenger's employment with Defendant.

REQUEST FOR PRODUCTION NO. 89.: Please produce copies of all e-mails pertaining to or sent to or from Jeffery P. Clevenger during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 90.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Jeffery P. Clevenger during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 91.: Please produce the personnel file for Jeffery P. Clevenger for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 92.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Marilyn J. Craig during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 93.: Please produce copies of all records pertaining to commissions or incentives paid to Marilyn J. Craig during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 94.: Please produce all records of the entry or departure of Marilyn J. Craig from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 95.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Marilyn J. Craig's employment with Defendant.

REQUEST FOR PRODUCTION NO. 96.: Please produce copies of all e-mails pertaining to or sent to or from Marilyn J. Craig during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 97.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Marilyn J. Craig during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 98.: Please produce the personnel file for Marilyn J. Craig for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 99.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Rory Kip DeRouen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 100.: Please produce copies of all records pertaining to commissions or incentives paid to Rory Kip DeRouen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 101.: Please produce all records of the entry or departure of Rory Kip DeRouen from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 102.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Rory Kip DeRouen's employment with Defendant.

REQUEST FOR PRODUCTION NO. 103.: Please produce copies of all e-mails pertaining to or sent to or from Rory Kip DeRouen during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 104.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Rory Kip DeRouen during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 105.: Please produce the personnel file for Rory Kip DeRouen for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 106.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Hector Dimas during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 107.: Please produce copies of all records pertaining to commissions or incentives paid to Hector Dimas during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 108.: Please produce all records of the entry or departure of Hector Dimas from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 109.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Hector Dimas's employment with Defendant.

REQUEST FOR PRODUCTION NO. 110.: Please produce copies of all e-mails pertaining to or sent to or from Hector Dimas during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 111.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Hector Dimas during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 112.: Please produce the personnel file for Hector Dimas for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 113.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Shelly L. Dyer during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 114.: Please produce copies of all records pertaining to commissions or incentives paid to Shelly L Dyer during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 115.: Please produce all records of the entry or departure of Shelly L. Dyer from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 116.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Shelly L. Dyer's employment with Defendant.

REQUEST FOR PRODUCTION NO. 117.: Please produce copies of all e-mails pertaining to or sent to or from Shelly L. Dyer during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 118. : Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Shelly L. Dyer during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 119.: Please produce the personnel file for Shelly L. Dyer for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 120.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Mathew Jarmane Ell during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 121.: Please produce copies of all records pertaining to commissions or incentives paid to Mathew Jarmane Ell during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 122.: Please produce all records of the entry or departure of Mathew Jarmane Ell from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 123.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Mathew Jarmane Ell's employment with Defendant.

REQUEST FOR PRODUCTION NO. 124.: Please produce copies of all e-mails pertaining to or sent to or from Mathew Jarmane Ell during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 125.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Mathew Jarmane Ell during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 126.: Please produce the personnel file for Mathew Jarmane Ell for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 127.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Kevin Engle during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 128.: Please produce copies of all records pertaining to commissions or incentives paid to Kevin Engle during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 129.: Please produce all records of the entry or departure of Kevin Engle from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 130.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Kevin Engle's employment with Defendant.

REQUEST FOR PRODUCTION NO. 131.: Please produce copies of all e-mails pertaining to or sent to or from Kevin Engle during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 132.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Kevin Engle during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 133.: Please produce the personnel file for Kevin Engle for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 134.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Ricky S. Ferrara during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 135.: Please produce copies of all records pertaining to commissions or incentives paid to Ricky S. Ferrara during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 136.: Please produce all records of the entry or departure of Ricky S. Ferrara from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 137.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Ricky S. Ferrara's employment with Defendant.

REQUEST FOR PRODUCTION NO. 138.: Please produce copies of all e-mails pertaining to or sent to or from Ricky S. Ferrara during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 139.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Ricky S. Ferrara during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 140.: Please produce the personnel file for Ricky S. Ferrara for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 141.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Eric Fillmore during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 142.: Please produce copies of all records pertaining to commissions or incentives paid to Eric Fillmore during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 143.: Please produce all records of the entry or departure of Eric Fillmore from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 144.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Eric Fillmore's employment with Defendant.

REQUEST FOR PRODUCTION NO. 145.: Please produce copies of all e-mails pertaining to or sent to or from Eric Fillmore during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 146.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Eric Fillmore during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 147.: Please produce the personnel file for Eric Fillmore for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 148.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Ken Ford during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 149.: Please produce copies of all records pertaining to commissions or incentives paid to Ken Ford during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 150.: Please produce all records of the entry or departure of Ken Ford from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 151.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Ken Ford's employment with Defendant.

REQUEST FOR PRODUCTION NO. 152.: Please produce copies of all e-mails pertaining to or sent to or from Ken Ford during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 153.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Ken Ford during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 154.: Please produce the personnel file for Ken Ford for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 155.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Alan C. Garcia during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 156.: Please produce copies of all records pertaining to commissions or incentives paid to Alan C. Garcia during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 157.: Please produce all records of the entry or departure of Alan C. Garcia from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 158.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Alan C. Garcia's employment with Defendant.

REQUEST FOR PRODUCTION NO. 159.: Please produce copies of all e-mails pertaining to or sent to or from Alan C. Garcia during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 160.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Alan C. Garcia during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 161.: Please produce the personnel file for Alan C. Garcia for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 162.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Julie Gardner during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 163.: Please produce copies of all records pertaining to commissions or incentives paid to Julie Gardner during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 164.: Please produce all records of the entry or departure of Julie Gardner from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 165.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Julie Gardner's employment with Defendant.

REQUEST FOR PRODUCTION NO. 166.: Please produce copies of all e-mails pertaining to or sent to or from Julie Gardner during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 167.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Julie Gardner during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 168.: Please produce the personnel file for Julie Gardner for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 169.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by James C. Gibson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 170.: Please produce copies of all records pertaining to commissions or incentives paid to James C. Gibson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 171.: Please produce all records of the entry or departure of James C. Gibson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 172.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to James C. Gibson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 173.: Please produce copies of all e-mails pertaining to or sent to or from James C. Gibson during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 174.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from James C. Gibson during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 175.: Please produce the personnel file for James C. Gibson for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 176.1: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Matthew L. Hagman during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 177.: Please produce copies of all records pertaining to commissions or incentives paid to Matthew L. Hagman during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 178.: Please produce all records of the entry or departure of Matthew L. Hagman from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 179.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Matthew L. Hagman's employment with Defendant.

REQUEST FOR PRODUCTION NO. 180.: Please produce copies of all e-mails pertaining to or sent to or from Matthew L. Hagman during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 181.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Matthew L. Hagman during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 182.: Please produce the personnel file for Matthew L. Hagman for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 183.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Debbie E. Harris during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 184.: Please produce copies of all records pertaining to commissions or incentives paid to Debbie E. Harris during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 185.: Please produce all records of the entry or departure of Debbie E. Harris from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 186.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Debbie E. Harris's employment with Defendant.

REQUEST FOR PRODUCTION NO. 187.: Please produce copies of all e-mails pertaining to or sent to or from Debbie E. Harris during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 188.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Debbie E. Harris during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 189.: Please produce the personnel file for Debbie E. Harris for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 190.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael F. Hazen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 191.: Please produce copies of all records pertaining to commissions or incentives paid to Michael F. Hazen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 192.: Please produce all records of the entry or departure of Michael F. Hazen from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 193.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Michael F. Hazen's employment with Defendant.

REQUEST FOR PRODUCTION NO. 194.: Please produce copies of all e-mails pertaining to or sent to or from Michael F. Hazen during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 195.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael F. Hazen during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 196.: Please produce the personnel file for Michael F. Hazen for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 197.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Tim Hedding during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 198.: Please produce copies of all records pertaining to commissions or incentives paid to Tim Hedding during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 199.: Please produce all records of the entry or departure of Tim Hedding from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 200.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Tim Hedding's employment with Defendant.

REQUEST FOR PRODUCTION NO. 201.: Please produce copies of all e-mails pertaining to or sent to or from Tim Hedding during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 202.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Tim Hedding during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 203.: Please produce the personnel file for Tim Hedding for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 204.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Kevin Henderson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 205.: Please produce copies of all records pertaining to commissions or incentives paid to Kevin Henderson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 206.: Please produce all records of the entry or departure of Kevin Henderson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 207.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Kevin Henderson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 208.: Please produce copies of all e-mails pertaining to or sent to or from Kevin Henderson during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 209.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Kevin Henderson during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 210.: Please produce the personnel file for Kevin Henderson for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 211.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Beverly J. Hilliard during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 212.: Please produce copies of all records pertaining to commissions or incentives paid to Beverly J. Hilliard during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 213.: Please produce all records of the entry or departure of Beverly J. Hilliard from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 214.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Beverly J. Hilliard's employment with Defendant.

REQUEST FOR PRODUCTION NO. 215.: Please produce copies of all e-mails pertaining to or sent to or from Beverly J. Hilliard during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 216.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Beverly J. Hilliard during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 217.: Please produce the personnel file for Beverly J. Hilliard for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 218.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael B. Hinckley during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 219.: Please produce copies of all records pertaining to commissions or incentives paid to Michael B. Hinckley during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 220.: Please produce all records of the entry or departure of Michael B. Hinckley from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 221.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Michael B. Hinckley's employment with Defendant.

REQUEST FOR PRODUCTION NO. 222.: Please produce copies of all e-mails pertaining to or sent to or from Michael B. Hinckley during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 223.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael B. Hinckley during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 224.: Please produce the personnel file for Michael B. Hinckley for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 225.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Jacqueline T. Hladun during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 226.: Please produce copies of all records pertaining to commissions or incentives paid to Jacqueline T. Hladun during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 227.: Please produce all records of the entry or departure of Jacqueline T. Hladun from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 228.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Jacqueline T. Hladun's employment with Defendant.

REQUEST FOR PRODUCTION NO. 229.: Please produce copies of all e-mails pertaining to or sent to or from Jacqueline T. Hladun during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 230.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Jacqueline T. Hladun during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 231.: Please produce the personnel file for Jacqueline T. Hladun for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 232.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Jared Hodges during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 233.: Please produce copies of all records pertaining to commissions or incentives paid to Jared Hodges during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 234.: Please produce all records of the entry or departure of Jared Hodges from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 235.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Jared Hodges's employment with Defendant.

REQUEST FOR PRODUCTION NO. 236.: Please produce copies of all e-mails pertaining to or sent to or from Jared Hodges during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 237.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Jared Hodges during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 238.: Please produce the personnel file for Jared Hodges for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 239.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Dale Hope during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 240.: Please produce copies of all records pertaining to commissions or incentives paid to Dale Hope during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 241.: Please produce all records of the entry or departure of Dale Hope from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 242.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Dale Hope's employment with Defendant.

REQUEST FOR PRODUCTION NO. 243.: Please produce copies of all e-mails pertaining to or sent to or from Dale Hope during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 244.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Dale Hope during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 245.: Please produce the personnel file for Dale Hope for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 246.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Don Hopkins during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 247.: Please produce copies of all records pertaining to commissions or incentives paid to Don Hopkins during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 3: Please produce all records of the entry or departure of Don Hopkins from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 248.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Don Hopkins's employment with Defendant.

REQUEST FOR PRODUCTION NO. 249.: Please produce copies of all e-mails pertaining to or sent to or from Don Hopkins during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 250.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Don Hopkins during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 251.: Please produce the personnel file for Don Hopkins for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 252.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Randy P. Howell during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 253.: Please produce copies of all records pertaining to commissions or incentives paid to Randy P. Howell during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 254. Please produce all records of the entry or departure of Randy P. Howell from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 255.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Randy P. Howell's employment with Defendant.

REQUEST FOR PRODUCTION NO. 256.: Please produce copies of all e-mails pertaining to or sent to or from Randy P. Howell during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 257.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Randy P. Howell during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 258.: Please produce the personnel file for Randy P. Howell for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 259.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Timothy Carl Kaufmann during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 260.: Please produce copies of all records pertaining to commissions or incentives paid to Timothy Carl Kaufmann during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 261.: Please produce all records of the entry or departure of Timothy Carl Kaufmann from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 262.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Timothy Carl Kaufmann's employment with Defendant.

REQUEST FOR PRODUCTION NO. 263.: Please produce copies of all e-mails pertaining to or sent to or from Timothy Carl Kaufmann during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 264.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Timothy Carl Kaufmann during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 265.: Please produce the personnel file for Timothy Carl Kaufmann for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 266.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Ryan Keen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 267.: Please produce copies of all records pertaining to commissions or incentives paid to Ryan Keen during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 268.: Please produce all records of the entry or departure of Ryan Keen from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 269.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Ryan Keen's employment with Defendant.

REQUEST FOR PRODUCTION NO. 270.: Please produce copies of all e-mails pertaining to or sent to or from Ryan Keen during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 271.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Ryan Keen during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 272.: Please produce the personnel file for Ryan Keen for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 273.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by David R. Kestner during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 274.: Please produce copies of all records pertaining to commissions or incentives paid to David R. Kestner during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 275.: Please produce all records of the entry or departure of David R. Kestner from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 276.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to David R. Kestner's employment with Defendant.

REQUEST FOR PRODUCTION NO. 277.: Please produce copies of all e-mails pertaining to or sent to or from David R. Kestner during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 278.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from David R. Kestner during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 279.: Please produce the personnel file for David R. Kestner for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 280.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by John Paul Kurtin during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 281.: Please produce copies of all records pertaining to commissions or incentives paid to John Paul Kurtin during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 282.: Please produce all records of the entry or departure of John Paul Kurtin from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 283.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to John Paul Kurtin's employment with Defendant.

REQUEST FOR PRODUCTION NO. 284.: Please produce copies of all e-mails pertaining to or sent to or from John Paul Kurtin during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 285.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from John Paul Kurtin during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 286.: Please produce the personnel file for John Paul Kurtin for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 287.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael Larscheid during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 288.: Please produce copies of all records pertaining to commissions or incentives paid to Michael Larscheid during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 289.: Please produce all records of the entry or departure of Michael Larscheid from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 290.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Michael Larscheid's employment with Defendant.

REQUEST FOR PRODUCTION NO. 291.: Please produce copies of all e-mails pertaining to or sent to or from Michael Larscheid during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 292.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael Larscheid during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 293.: Please produce the personnel file for Michael Larscheid for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 294.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Linda C. Lee during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 295.: Please produce copies of all records pertaining to commissions or incentives paid to Linda C. Lee during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 296.: Please produce all records of the entry or departure of Linda C. Lee from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 297.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Linda C. Lee's employment with Defendant.

REQUEST FOR PRODUCTION NO. 298.: Please produce copies of all e-mails pertaining to or sent to or from Linda C. Lee during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 299.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Linda C. Lee during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 300.: Please produce the personnel file for Linda C. Lee for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 301.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Anthony Limani during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 302.: Please produce copies of all records pertaining to commissions or incentives paid to Anthony Limani during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 303.: Please produce all records of the entry or departure of Anthony Limani from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 304.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Anthony Limani's employment with Defendant.

REQUEST FOR PRODUCTION NO. 305.: Please produce copies of all e-mails pertaining to or sent to or from Anthony Limani during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 306.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Anthony Limani during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 307.: Please produce the personnel file for Anthony Limani for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 308.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Jay S. Madison during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 309.: Please produce copies of all records pertaining to commissions or incentives paid to Jay S. Madison during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 310.: Please produce all records of the entry or departure of Jay S. Madison from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 311.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Jay S. Madison's employment with Defendant.

REQUEST FOR PRODUCTION NO. 312.: Please produce copies of all e-mails pertaining to or sent to or from Jay S. Madison during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 313.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Jay S. Madison during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 314.: Please produce the personnel file for Jay S. Madison for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 315.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Marvin L. Masteller during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 316.: Please produce copies of all records pertaining to commissions or incentives paid to Marvin L. Masteller during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 317.: Please produce all records of the entry or departure of Marvin L. Masteller from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 318.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Marvin L. Masteller's employment with Defendant.

REQUEST FOR PRODUCTION NO. 319.: Please produce copies of all e-mails pertaining to or sent to or from Marvin L. Masteller during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 320.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Marvin L. Masteller during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 321.: Please produce the personnel file for Marvin L. Masteller for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 322.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Carren Mattson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 323.: Please produce copies of all records pertaining to commissions or incentives paid to Carren Mattson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 324.: Please produce all records of the entry or departure of Carren Mattson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 325.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Carren Mattson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 326.: Please produce copies of all e-mails pertaining to or sent to or from Carren Mattson during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 327.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Carren Mattson during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 328.: Please produce the personnel file for Carren Mattson for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 329.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Robert McCarter during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 330.: Please produce copies of all records pertaining to commissions or incentives paid to Robert McCarter during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 331.: Please produce all records of the entry or departure of Robert McCarter from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 332.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Robert McCarter's employment with Defendant.

REQUEST FOR PRODUCTION NO. 333.: Please produce copies of all e-mails pertaining to or sent to or from Robert McCarter during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 334.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Robert McCarter during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 335.: Please produce the personnel file for Robert McCarter for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 336.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Christopher McCullough during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 337.: Please produce copies of all records pertaining to commissions or incentives paid to Christopher McCullough during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 338.: Please produce all records of the entry or departure of Christopher McCullough from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 339.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Christopher McCullough's employment with Defendant.

REQUEST FOR PRODUCTION NO. 340.: Please produce copies of all e-mails pertaining to or sent to or from Christopher McCullough during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 341.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Christopher McCullough during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 342.: Please produce the personnel file for Christopher McCullough for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 343.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Laurie (Paine) McGeorge during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 344.: Please produce copies of all records pertaining to commissions or incentives paid to Laurie (Paine) McGeorge during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 345.: Please produce all records of the entry or departure of Laurie (Paine) McGeorge from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 346.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Laurie (Paine) McGeorge's employment with Defendant.

REQUEST FOR PRODUCTION NO. 347.: Please produce copies of all e-mails pertaining to or sent to or from Laurie (Paine) McGeorge during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 348.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Laurie (Paine) McGeorge during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 349.: Please produce the personnel file for Laurie (Paine) McGeorge for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 350.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Charles McGuire during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 351.: Please produce copies of all records pertaining to commissions or incentives paid to Charles McGuire during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 352.: Please produce all records of the entry or departure of Charles McGuire from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 353.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Charles McGuire's employment with Defendant.

REQUEST FOR PRODUCTION NO. 354. Please produce copies of all e-mails pertaining to or sent to or from Charles McGuire during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 355.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Charles McGuire during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 356.: Please produce the personnel file for Charles McGuire for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 357.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Don McMurrian during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 358.: Please produce copies of all records pertaining to commissions or incentives paid to Don McMurrian during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 359.: Please produce all records of the entry or departure of Don McMurrian from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 360.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Don McMurrian's employment with Defendant.

REQUEST FOR PRODUCTION NO. 361.: Please produce copies of all e-mails pertaining to or sent to or from Don McMurrian during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 362.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Don McMurrian during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 363.: Please produce the personnel file for Don McMurrian for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 364.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Stephen Miller during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 365.: Please produce copies of all records pertaining to commissions or incentives paid to Stephen Miller during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 366.: Please produce all records of the entry or departure of Stephen Miller from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 367.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Stephen Miller's employment with Defendant.

REQUEST FOR PRODUCTION NO. 368.: Please produce copies of all e-mails pertaining to or sent to or from Stephen Miller during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 369.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Stephen Miller during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 370.: Please produce the personnel file for Stephen Miller for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 371.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Isaac Moffett during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 372.: Please produce copies of all records pertaining to commissions or incentives paid to Isaac Moffett during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 373.: Please produce all records of the entry or departure of Isaac Moffett from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 374.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Isaac Moffett's employment with Defendant.

REQUEST FOR PRODUCTION NO. 375.: Please produce copies of all e-mails pertaining to or sent to or from Isaac Moffett during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 376.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Isaac Moffett during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 377.: Please produce the personnel file for Isaac Moffett for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 378.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Deborah Monahan during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 379.: Please produce copies of all records pertaining to commissions or incentives paid to Deborah Monahan during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 380.: Please produce all records of the entry or departure of Deborah Monahan from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 381.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Deborah Monahan's employment with Defendant.

REQUEST FOR PRODUCTION NO. 382.: Please produce copies of all e-mails pertaining to or sent to or from Deborah Monahan during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 383.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Deborah Monahan during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 384.: Please produce the personnel file for Deborah Monahan for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 385.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michael Moser during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 386.: Please produce copies of all records pertaining to commissions or incentives paid to Michael Moser during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 387.: Please produce all records of the entry or departure of Michael Moser from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 388.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Michael Moser's employment with Defendant.

REQUEST FOR PRODUCTION NO. 389.: Please produce copies of all e-mails pertaining to or sent to or from Michael Moser during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 390.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michael Moser during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 391.: Please produce the personnel file for Michael Moser for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 392.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Janice S. Nitz during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 393.: Please produce copies of all records pertaining to commissions or incentives paid to Janice S. Nitz during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 394.: Please produce all records of the entry or departure of Janice S. Nitz from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 395.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Janice S. Nitz's employment with Defendant.

REQUEST FOR PRODUCTION NO. 396.: Please produce copies of all e-mails pertaining to or sent to or from Janice S. Nitz during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 397.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Janice S. Nitz during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 398.: Please produce the personnel file for Janice S. Nitz for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 399.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Chris Papero during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 400.: Please produce copies of all records pertaining to commissions or incentives paid to Chris Papero during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 401.: Please produce all records of the entry or departure of Chris Papero from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 402.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Chris Papero's employment with Defendant.

REQUEST FOR PRODUCTION NO. 403.: Please produce copies of all e-mails pertaining to or sent to or from Chris Papero during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 404.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Chris Papero during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 405.: Please produce the personnel file for Chris Papero for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 406.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Susan Pierce during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 407.: Please produce copies of all records pertaining to commissions or incentives paid to Susan Pierce during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. v: Please produce all records of the entry or departure of Susan Pierce from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 408.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Susan Pierce's employment with Defendant.

REQUEST FOR PRODUCTION NO. 409.: Please produce copies of all e-mails pertaining to or sent to or from Susan Pierce during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 410.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Susan Pierce during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 411.: Please produce the personnel file for Susan Pierce for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 412.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Patrick Revels during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 413.: Please produce copies of all records pertaining to commissions or incentives paid to Patrick Revels during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 414.: Please produce all records of the entry or departure of Patrick Revels from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 415.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Patrick Revels's employment with Defendant.

REQUEST FOR PRODUCTION NO. 416.: Please produce copies of all e-mails pertaining to or sent to or from Patrick Revels during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 417.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Patrick Revels during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 418.: Please produce the personnel file for Patrick Revels for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 419.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Collin Reynolds during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 420.: Please produce copies of all records pertaining to commissions or incentives paid to Collin Reynolds during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 421.: Please produce all records of the entry or departure of Collin Reynolds from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 422.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Collin Reynolds's employment with Defendant.

REQUEST FOR PRODUCTION NO. 423.: Please produce copies of all e-mails pertaining to or sent to or from Collin Reynolds during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 424.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Collin Reynolds during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 425.: Please produce the personnel file for Collin Reynolds for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 426.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by April Rinehart during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 427.: Please produce copies of all records pertaining to commissions or incentives paid to April Rinehart during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 428.: Please produce all records of the entry or departure of April Rinehart from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 429.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to April Rinehart's employment with Defendant.

REQUEST FOR PRODUCTION NO. 430.: Please produce copies of all e-mails pertaining to or sent to or from April Rinehart during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 431.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from April Rinehart during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 432.: Please produce the personnel file for April Rinehart for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 433.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Thomas Robertson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 434.: Please produce copies of all records pertaining to commissions or incentives paid to Thomas Robertson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 435.: Please produce all records of the entry or departure of Thomas Robertson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 436.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Thomas Robertson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 437.: Please produce copies of all e-mails pertaining to or sent to or from Thomas Robertson during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 438.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Thomas Robertson during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 439.: Please produce the personnel file for Thomas Robertson for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 440.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Michelle Saari during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 441.: Please produce copies of all records pertaining to commissions or incentives paid to Michelle Saari during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 442.: Please produce all records of the entry or departure of Michelle Saari from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 443.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Michelle Saari's employment with Defendant.

REQUEST FOR PRODUCTION NO. 444.: Please produce copies of all e-mails pertaining to or sent to or from Michelle Saari during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 445.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Michelle Saari during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 446.: Please produce the personnel file for Michelle Saari for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 447.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Cheryl Sanderson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 448.: Please produce copies of all records pertaining to commissions or incentives paid to Cheryl Sanderson during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 449.: Please produce all records of the entry or departure of Cheryl Sanderson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 450.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Cheryl Sanderson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 451.: Please produce copies of all e-mails pertaining to or sent to or from Cheryl Sanderson during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 452.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Cheryl Sanderson during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 453.: Please produce the personnel file for Cheryl Sanderson for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 454.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by John Seale during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 455.: Please produce copies of all records pertaining to commissions or incentives paid to John Seale during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 456.: Please produce all records of the entry or departure of John Seale from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 457.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to John Seale's employment with Defendant.

REQUEST FOR PRODUCTION NO. 458.: Please produce copies of all e-mails pertaining to or sent to or from John Seale during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 459.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from John Seale during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 460.: Please produce the personnel file for John Seale for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 461.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Kimberley Smith during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 462.: Please produce copies of all records pertaining to commissions or incentives paid to Kimberley Smith during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 463.: Please produce all records of the entry or departure of Kimberley Smith from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 464.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Kimberley Smith's employment with Defendant.

REQUEST FOR PRODUCTION NO. 465.: Please produce copies of all e-mails pertaining to or sent to or from Kimberley Smith during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 466.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Kimberley Smith during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 467.: Please produce the personnel file for Kimberley Smith for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 468.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Cheryl (Whitenett) Stumph during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 469.: Please produce copies of all records pertaining to commissions or incentives paid to Cheryl (Whitenett) Stumph during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 470.: Please produce all records of the entry or departure of Cheryl (Whitenett) Stumph from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 471.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Cheryl (Whitenett) Stumph's employment with Defendant.

REQUEST FOR PRODUCTION NO. 472.: Please produce copies of all e-mails pertaining to or sent to or from Cheryl (Whitenett) Stumph during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 473.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Cheryl (Whitenett) Stumph during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 474.: Please produce the personnel file for Cheryl (Whitenett) Stumph for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 475.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Kurt Swanson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 476.: Please produce copies of all records pertaining to commissions or incentives paid to Kurt Swanson during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 477.: Please produce all records of the entry or departure of Kurt Swanson from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 478.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Kurt Swanson's employment with Defendant.

REQUEST FOR PRODUCTION NO. 479.: Please produce copies of all e-mails pertaining to or sent to or from Kurt Swanson during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 480.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Kurt Swanson during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 481.: Please produce the personnel file for Kurt Swanson for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 482.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Rose Thies during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 483.: Please produce copies of all records pertaining to commissions or incentives paid to Rose Thies during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 484.: Please produce all records of the entry or departure of Rose Thies from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 485.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Rose Thies's employment with Defendant.

REQUEST FOR PRODUCTION NO. 486.: Please produce copies of all e-mails pertaining to or sent to or from Rose Thies during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 487.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Rose Thies during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 488.: Please produce the personnel file for Rose Thies for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 489.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by David A. Thom during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 490.: Please produce copies of all records pertaining to commissions or incentives paid to David A. Thom during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 491.: Please produce all records of the entry or departure of David A. Thom from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 492.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to David A. Thom's employment with Defendant.

REQUEST FOR PRODUCTION NO. 493.: Please produce copies of all e-mails pertaining to or sent to or from David A. Thom during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 494.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from David A. Thom during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 495.: Please produce the personnel file for David A. Thom for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 496.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Steven W. Tom during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 497.: Please produce copies of all records pertaining to commissions or incentives paid to Steven W. Tom during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 498.: Please produce all records of the entry or departure of Steven W. Tom from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 499.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Steven W. Tom's employment with Defendant.

REQUEST FOR PRODUCTION NO. 500.: Please produce copies of all e-mails pertaining to or sent to or from Steven W. Tom during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 501.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Steven W. Tom during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 502.: Please produce the personnel file for Steven W. Tom for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 503.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Nanci (Watterson) Uli during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 504.: Please produce copies of all records pertaining to commissions or incentives paid to Nanci (Watterson) Uli during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 505.: Please produce all records of the entry or departure of Nanci (Watterson) Uli from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 506.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Nanci (Watterson) Uli's employment with Defendant.

REQUEST FOR PRODUCTION NO. 507.: Please produce copies of all e-mails pertaining to or sent to or from Nanci (Watterson) Uli during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 508.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Nanci (Watterson) Uli during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 509.: Please produce the personnel file for Nanci (Watterson) Uli for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 510.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by James Wells during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 511.: Please produce copies of all records pertaining to commissions or incentives paid to James Wells during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 512.: Please produce all records of the entry or departure of James Wells from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 513.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to James Wells's employment with Defendant.

REQUEST FOR PRODUCTION NO. 514.: Please produce copies of all e-mails pertaining to or sent to or from James Wells during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 515.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from James Wells during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 516.: Please produce the personnel file for James Wells for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 517.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Tracy Scott Wells during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 518.: Please produce copies of all records pertaining to commissions or incentives paid to Tracy Scott Wells during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 519.: Please produce all records of the entry or departure of Tracy Scott Wells from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 520.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Tracy Scott Wells's employment with Defendant.

REQUEST FOR PRODUCTION NO. 521.: Please produce copies of all e-mails pertaining to or sent to or from Tracy Scott Wells during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 522.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Tracy Scott Wells during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 523.: Please produce the personnel file for Tracy Scott Wells for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 524.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Nanette Westenhaver during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 525.: Please produce copies of all records pertaining to commissions or incentives paid to Nanette Westenhaver during her employment with the Defendant.

REQUEST FOR PRODUCTION NO. 526.: Please produce all records of the entry or departure of Nanette Westenhaver from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 527.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Nanette Westenhaver's employment with Defendant.

REQUEST FOR PRODUCTION NO. 528.: Please produce copies of all e-mails pertaining to or sent to or from Nanette Westenhaver during all time periods that she was employed with Defendant.

REQUEST FOR PRODUCTION NO. 529.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Nanette Westenhaver during all time periods of her employment with Defendant.

REQUEST FOR PRODUCTION NO. 530.: Please produce the personnel file for Nanette Westenhaver for the period of time while she was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 531.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Chris Wing during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 532.: Please produce copies of all records pertaining to commissions or incentives paid to Chris Wing during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 533.: Please produce all records of the entry or departure of Chris Wing from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 534.: Please produce copies of all time card, time sheet, and/or Time Sheet List Detail records pertaining to Chris Wing's employment with Defendant.

REQUEST FOR PRODUCTION NO. 535.: Please produce copies of all e-mails pertaining to or sent to or from Chris Wing during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 536.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Chris Wing during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 537.: Please produce the personnel file for Chris Wing for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 538.: Please produce copies of any and all payroll records, employee statement of earnings, Fiscal Registers showing pay, or other records showing pay pertaining to income earned by Robert S. Wood during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 539.: Please produce copies of all records pertaining to commissions or incentives paid to Robert S. Wood during his employment with the Defendant.

REQUEST FOR PRODUCTION NO. 540.: Please produce all records of the entry or departure of Robert S. Wood from any facility owned, leased, or otherwise controlled by the Defendant. This request shall include, but not be limited to, records resulting from the swipe of a security badge to enter or exit such a facility.

REQUEST FOR PRODUCTION NO. 541.: Please produce copies of all time card , time sheet, and/or Time Sheet List Detail records pertaining to Robert S. Wood's employment with Defendant.

REQUEST FOR PRODUCTION NO. 542.: Please produce copies of all e-mails pertaining to or sent to or from Robert S. Wood during all time periods that he was employed with Defendant.

REQUEST FOR PRODUCTION NO. 543.: Please produce copies of instant messages or any other electronic transmissions other than e-mails that either pertain to or were sent to or from Robert S. Wood during all time periods of his employment with Defendant.

REQUEST FOR PRODUCTION NO. 544.: Please produce the personnel file for Robert S. Wood for the period of time while he was employed with the Defendant.

REQUEST FOR PRODUCTION NO. 545.: Please produce all documents including, but limited to, calendars, correspondence, memos, reports, e-mails or electronic transmissions, or any other records pertaining to identification of the fiscal week, fiscal month and/or fiscal year for the Defendant between June 1, 1998 and June 1, 2001.

DATED this 7 day of July, 2004.

HUNTLEY PARK, LLP



Christopher F. Huntley
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on this 7 day of July, 2004, a true and correct copy of the foregoing instrument was served upon opposing counsel as indicated below:

Kim J. Dockstader
Gregory C. Tollefson
STOEL RIVES LLP
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702-5958

Via Hand Delivery
 Via Facsimile 389-9040
 Via U. S. Mail

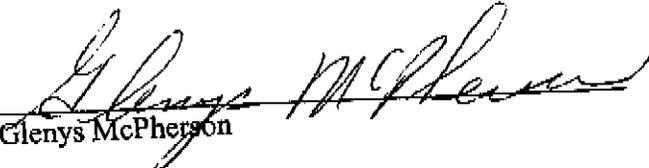

Glenys McPherson

EXHIBIT B



101 S. Capitol Boulevard, Suite 1900
Boise, Idaho 83702
main 208.389.9000
fax 208.389.9040
www.stoel.com

KIM DOCKSTADER
Direct (208) 387-4287
kdockstader@stoel.com

July 20, 2004

VIA FACSIMILE (345-7894) AND U.S. MAIL

William H. Thomas
Daniel E. Williams
Christopher F. Huntley
Huntley Park LLP
250 South 5th, Suite 660
P.O. Box 2188
Boise, Idaho 83701

Re: *Smith, et al. v. Micron Electronics, Inc.*

Gentlemen:

We are in receipt of Plaintiffs' Sixth Set of Requests for Production of Documents which were served via hand delivery on July 7, 2004. We will not be providing a substantive response to the discovery requests, as they are without question untimely served and in violation of Judge Winnill's May 23, 2003 Scheduling Order. (Docket No. 166.) We ask that you immediately withdraw the requests.

The deadline for completion of discovery was May 3, 2004. As the Court's Scheduling Order states, this deadline is "for the completion of all discovery . . . not a deadline for discovery requests. Discovery requests must be made far enough in advance . . . to allow completion of the discovery by the deadline dates." (Scheduling Order at ¶ 6.) (Emphasis in original.)

Therefore, the last day for the Parties to serve discovery requests via mail was March 30, 2004 and the last day for the Parties to serve discovery requests via hand delivery was April 2, 2004.

Although the Parties did stipulate to stay certain depositions and specified discovery responses (see May 21, 2004 Stipulated Motion (Docket No. 188) and June 17, 2004 Order (Docket No. 192), Defendant never agreed to nor did you ever request an extension of the deadline for service of discovery requests. In fact, the Stipulated Motion was executed by the Parties on May 19, 2004 and May 20, 2004, well after the discovery cut-off date of May 3, 2004.

Oregon
Washington
California
Utah
Idaho



William H. Thomas
Daniel E. Williams
Christopher F. Huntley
July 20, 2004
Page 2

Furthermore, on April 5, 2004, Dan Williams sent a letter to our office in response to our request for depositions of certain class members. In his letter, Dan proposed extending the discovery deadline for class certification issues beyond May 3, 2004, in order to use the month of May and first part of June to schedule depositions.

On April 6, 2004, I sent a response letter to your office agreeing to Dan's proposal to stipulate to extend the discovery deadline for class certification issues beyond May 3, 2004, but agreed to extend the deadline solely for the taking of depositions. This exchange resulted in the above-referenced Stipulated Motion, which did not include an extension of the deadline for service of discovery requests.

Very truly yours,



Kim Dockstader

EXHIBIT C

Huntley Park LLP
Uncommon Law

RECEIVED

JUL 26 2004

(Handwritten initials)

July 22, 2004

Robert C. Huntley
William H. Thomas
F. Michael Burkett
Steven L. Olsen
Daniel E. Williams
Christopher F. Huntley
Timothy D. Neville
Barbara Beehner-Kane

Of Counsel:
W. Anthony Park
Larry L. Goins

**Via Fax: 389-9040
& U.S. Mail**

Kim J. Dockstader
Gregory C. Tollefson
Stoel Rives LLP
101 S. Capitol Blvd., Suite 1900
Boise, ID 83702

RE: Smith, et al., v. Micron Electronics

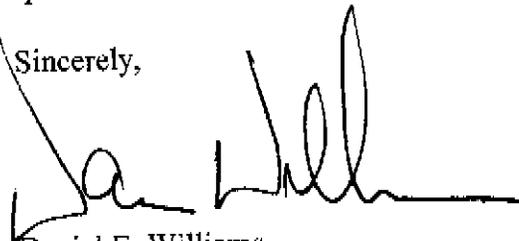
Gentlemen:

I am writing in response to Kim's letter of July 20, 2004, regarding Plaintiffs' Sixth Set of Requests for Production of Documents ("Plaintiffs' Sixth Set").

As you will note and in spite of your careful excision of the relevant language from Judge Winmill's Scheduling Order of May 23, 2003, the May 3, 2004, deadline was for completion of discovery regarding certification issues. Plaintiffs' Sixth Set does not deal with certification issues, but rather, deals with damages and your client's timely responses are necessary for Plaintiffs to adhere to the deadline for disclosure of expert opinion.

Please advise immediately if you still refuse to provide a substantive response to Plaintiffs' Sixth Set and we will file the appropriate motion and seek fees and costs in so doing.

Sincerely,



Daniel E. Williams

DEW:g

EXHIBIT D

101 S. Capitol Boulevard, Suite 1900
Boise, Idaho 83702
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www.stoel.com



KIM DOCKSTADER
Direct (208) 387-4287
kdockstader@stoel.com

July 29, 2004

VIA FACSIMILE (345-7894) AND U.S. MAIL

Daniel E. Williams
Huntley Park LLP
250 South 5th, Suite 660
P.O. Box 2188
Boise, Idaho 83701

Re: *Smith, et al. v. Micron Electronics, Inc.*

Dear Dan:

We are in receipt of your July 22, 2004 correspondence concerning Plaintiffs' Sixth Set of Requests for Production of Documents.

We do not dispute that the May 3, 2004 deadline set forth in Judge Winmill's May 23, 2003 Scheduling Order (docket no. 166) was for the completion of discovery related to class certification issues.

In your letter of July 22, 2004, you state that Plaintiffs' Sixth Set of Requests for Production of Documents does not deal with class certification issues. We are surprised that you have initiated discovery on non-class certification issues when we have not yet participated in the hearing on final class certification. The November 16, 2004 hearing will determine whether or not this case continues in litigation as a collective action or otherwise.

Our position is that there is no foundation for discovery related to non-class certification issues. The Court's Scheduling Order is ambiguous with regard to any deadlines for discovery beyond class certification issues and this issue will need to be addressed by the Court. We have no problem with moving out your deadline for expert disclosures. Please let us know what you would propose in that regard.

Although you have admitted that Plaintiffs' Sixth Set of Requests for Production of Documents is not related to class certification issues, we will respond in a timely fashion with our objections.

Oregon
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California
Utah
Idaho



Daniel E. Williams
July 29, 2004
Page 2

If after the November 16, 2004 hearing the class is certified, we will request a new scheduling order from the Court, including a new deadline for discovery, and comply with any discovery requests Plaintiffs see fit to serve.

Very truly yours,


Kim Dockstader

KD:cv

EXHIBIT E



August 2, 2004

Via Facsimile: 389-9040

Kim J. Dockstader
Stoel Rives LLP
101 S. Capitol Boulevard, Suite 1900
Boise, Idaho 83702

Re: Smith, et al., v. Micron Electronics

Dear Kim:

Thank you for your letter of July 29, 2004, regarding Plaintiffs' Sixth Set of Requests for Production of Documents. As I indicated to you in my earlier letter of July 22, 2004, these requests are meant to provide us with the necessary information to begin actual damage calculations, rather than rely on models and assumptions.

For several reasons we are unable to agree with your suggestion that we postpone your responses to our requests, as well as the deadline for expert disclosures. First, you have already repeatedly told us that you have compiled and analyzed the documents we have requested. Our understanding is that one of the bases upon which your client has tried to justify its extremely low settlement offers was your analysis of these documents. We have a similar right to examine these documents and adjust, if necessary, our own settlement position. Moreover, because you have already compiled and analyzed these documents, it obviously presents no undue burden on your client to produce them to us. Nothing in the Court's Scheduling Order suggests that your client should not produce these materials.

Accordingly, we must insist that your client produce these materials as soon as possible.

Sincerely,

A handwritten signature in black ink, appearing to read "Dan Williams", written over a horizontal line.

Daniel E. Williams

DEW:g