
DISTRICT COURT, ARAPAHOE COUNTY,
COLORADO

Address: 7325 South Potomac St.,
Centennial, CO 80112

Plaintiff: USA TAX LAW CENTER, INC.,
dba US FAX LAW CENTER, INC.

v.

Defendant: PERRY JOHNSON, INC.

▲ COURT USE ONLY ▲

Case Number: 03 CV 5317

Division: 402

Attorney: Roger T. Castle, P.C.
Roger T. Castle
1888 Sherman Street, Suite 415
Denver, CO 80203

Phone Number: (303) 839-8251
Atty. Reg. #7621
E-mail: rtcpc@earthlink.net

**DEFENDANT'S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS
TO PLAINTIFF**

PURSUANT TO RULE 34 of the Colorado Rules of Civil Procedure, the Defendant requests the Plaintiff to respond within thirty (30) days to the following request:

That the Plaintiff produce and permit the Defendant to inspect and copy true, accurate, legible copies of each of the following documents or things:

10. For each facsimile and each assignment at issue in this case, produce all documents that would in any way prove or establish the particular telephone line/ telephone number on which each facsimile was allegedly received.

11. For each assignor and each facsimile received by each assignor at issue in this case, produce a full and complete copy of the telephone bill/statement --- for the telephone line/telephone number that each facsimile was allegedly received through or on --- for the month or time period during which the facsimile in question was allegedly received, together with any other documentation tending to establish the identity of the owner of the particular telephone line on which the facsimile was received at the time that the facsimile was allegedly received.

Such inspection, copying and production to be made on September 13, 2004, at 10:00 a.m., at the law offices of Roger T. Castle, P.C., 1888 Sherman Street, Suite 415, Denver, Colorado 80203.

ROGER T. CASTLE, P.C.

Roger T. Castle, #7621

CERTIFICATE OF MAILING

I hereby certify that on this 9th day of August, 2004, I have deposited a true and correct copy of the foregoing Defendant's Second Request for Production of Documents to Plaintiff in the United States mail, postage prepaid, and properly addressed to the following:

Frank Ball, Esq.
Law Office of Frank J. Ball
7880 E. Berry Place
Greenwood Village, CO 80111
