

thirty (30) days from the date of service hereof, all documents and tangible things described in these requests which are in the possession, custody, or control of you or your attorneys, employees, insurance carriers, investigators, agents, or anyone else otherwise subject to your control.

4. If these interrogatories cannot be answered in full, answer to the extent possible, specify the reason for your inability to answer the remainder, and state whatever information and knowledge you have regarding the unanswered portion.
5. If you maintain that any document or record which relates to your interrogatory answer has been destroyed, state the content of the document, the location of any copies of said document, the location of any copies of said document, the date the document was destroyed and the name of the person who ordered or authorized the destruction.
6. In the event that production of any document or thing that is the subject of an interrogatory is objected to by you:
 - a. Produce sealed copies of such materials so as to permit an in camera inspection of said documents and things, so that the appropriateness of production can be promptly determined by the Court;
 - b. Pursuant to Rule 33 of the Indiana Rules of Trial Procedure, state the basis of the objection with respect to each document or category of documents and things for which production is requested and to which there is an objection; and
 - c. Identify each document that is requested by for which reproduction is not permitted setting forth as applicable the date, author, recipient, subject matter, and number of pages of each document.
7. In addition to Instruction #4, if any document called identification is withheld on the basis of a claim of privilege, including but not limited to attorney-client privilege and the attorney work-product doctrine, pursuant to Rule 33 of the Indiana Rules of Trial Procedure, state and identify as to each document the:
 - a. Date document prepared or executed;
 - b. Drafter or author of document;
 - c. Each and every person who prepared or assisted in the preparation of the document;
 - d. Each and every person who received the document;
 - e. Present location and custodian of the document; and

- f. Explain the circumstances upon which you base your claim of privilege.

DIRECTIONS AND DEFINITIONS

- A. The term "person" and "entity" shall mean natural persons, corporations, partnerships, sole proprietorships, unions, trusts, associations, any unincorporated organization or governmental or political subdivision thereof, federations, joint stock companies, or any kind of entity.
- B. The term "document" shall mean any printed, typewritten, handwritten, or otherwise recorded matter of whatever character, including but not limited to, letters, purchase orders, memoranda, telegrams, notes, contracts, catalogs, inter-office communications, statements, announcements, photographs, mechanical and sound recordings, motion pictures, entries in the books of accounting or financial records and any carbon, photographic, or photostatic copies of any such materials, if you do not have custody of the original. If any document to be produced was, but is no longer in, your possession or control or is no longer in existence, state whether it is: (a) missing or lost; (b) destroyed; (c) transferred voluntarily or involuntarily to others and, if so, to whom; (d) otherwise disposed of stating the circumstances surrounding the authorization for such disposition and state the approximate date thereof.
- C. The terms "you" and "your" shall mean you and every other individual, who, because acting as your representative, can be required by you to furnish information, including any person acting on your behalf as your representative in an investigation or preparation of this action.
- D. The terms "identify," "identity," "identification," "describe," or "description:"
1. When used in reference to an individual, shall mean to state his or her full name, present or last known address, telephone number, business affiliation and business address;
 2. When used in reference to a corporation, shall mean to state its full name, its state of incorporation, the address of its principal place of business, and the telephone number of its principal place of business.
 3. When used in reference to a person other than an individual or corporation, shall mean to state its official name, organization form, and its complete address and telephone number;
 4. When used in reference to documents, shall mean to state the type of documents, date, author or authors, addressee, title, its present location, the name and address of the person having custody thereof and the

substance of the documents' contents. In lieu of identifying any documents, you may furnish a full copy;

5. When used in reference to an agreement or contract, shall mean to state the names of each party to the agreement or contract, the date that it was entered into, the place where it was entered into, its terms and/or conditions, its present location, the name and address of the person having custody thereof, and the substance of the agreement or contract's contents. In the agreement of contract has been amended or modified, it must be states and the above information furnished on each such modification. In lieu of identifying any agreement or contract, you may furnish a full copy;
 6. When used in reference to any act, occurrence, occasion, meeting, transaction, or conduct, shall mean to set forth the event or events constituting such action, its location, the date and persons participating, present, or involved, and the documents relating or referring in any way thereof;
 7. When used in reference to any discussion, conversation, communication, or statement, shall mean in addition to the foregoing items in paragraph 6, to set forth the substance or that discussion, conversation, communication, or statement.
- E. The term "oral communication" includes, without limiting the generality of its meaning, all manner and forms of communication, other than a document, which records, refers or relates to, sets forth or describes, any act, transaction, occurrence, event or omission relating in any way to matters or things about which inquiry is made in these interrogatories.

INTERROGATORIES

1. State the full name of the defendant answering, as well as your current residence address, date of birth, marital status, driver's license number and issuing state, and social security number, and, if different, give the full name, as well as the current residence address, date of birth, marital status, driver's license number and issuing state, and social security number of the individual signing these answers.

ANSWER:

2. Identify and inventory all tangible assets, items, or other materials that you acknowledge or otherwise agree was the sole property of Robert P. Bolin at the time of his passing and in so identifying such property indicate what you believe is the value of such property at the time of Robert's passing, how you

calculated or otherwise valued each such piece of property, and who is currently in possession of such property.


Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

3. Identify and inventory all tangible assets, items, or other materials that you acknowledge or otherwise agree was not the sole property of Robert P. Bolin at the time of his passing and in so identifying such property indicate minimally who(m) you believe owned the property and in what proportion, what your basis is for your belief as to the ownership at the time of Robert's death is, what you believe is the value of such property at the time of Robert's passing, how you calculated or otherwise valued each such piece of property, and who is currently in possession of such property.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

4.  Identify and inventory all bank accounts, notes, trusts, multiparty accounts, life insurance policies, money market accounts, IRAs, and any and all other funds or accounts on deposit known or believed by you that Robert owned, or managed, or in any way retained any capacity to control at any time up to the time of his passing and in so doing indicate minimally the bank or institution the funds were deposited with, what your basis is for your belief as to the ownership at the time of Robert's death is, what you believe is the value of such property at the time of Robert's passing, how you calculated or otherwise valued each such piece of property, and who is currently in possession of such property.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

5. Identify and inventory all stocks, forms or equity, bonds, notes, claims, or other debts and/or obligations known or believed by you that Robert owned, or managed, or in any way retained any capacity to control at any time up to the time of his passing and in so doing indicate minimally the nature of the interest and all parties thereto, what your basis is for your belief as to the ownership at the time of Robert's death is, what you believe is the value of such property at the time of Robert's passing, how you calculated or otherwise valued each such piece of property, and who is currently in possession of such property or the proceeds therefrom.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

6. Identify and inventory all emblements, crops, or other properties or assets accrued through the labor of others that Robert owned, or managed, or in any way retained any capacity to control at any time up to the time of his passing and in so doing indicate minimally the nature of the interest and all parties thereto, what your basis is for your belief as to the ownership at the time of Robert's death is, what you believe is the value of such property at the time of Robert's passing, how you calculated or otherwise valued each such piece of property, and who is currently in possession of such property or the proceeds therefrom.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

7. Identify and inventory all receipts and other assets you acquired or otherwise collected in any capacity on behalf of the Estate, and in so identifying such property indicate where such property currently is and who is in possession of the same, what you believe is the value of such property at the time of Robert's passing, how you calculated or otherwise valued each such piece of property, and who is currently in possession of such property.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

8. Identify any and all expenses you have incurred on behalf of the estate for any purpose including burial and internment of the decedent, and in so doing minimally indicate who received the funds, what the funds were used for or otherwise applied to, and the source of any funds used to pay those expense.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

9. Identify any and all returns, filings, or other documents prepared or actually filed on behalf of Robert P. Bolin and/or his estate for income, inheritance, gift, and any other purpose and in so doing identify the person(s) who assisted with the preparation of the same.

Also, pursuant to T.R. 34, please provide a copy of all documents or other materials that reference or refer to the same.

ANSWER:

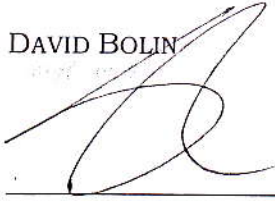
The undersigned person herewith states under oath that the above foregoing answers to these discovery requests are true, complete, and accurate and that same have been signed and dated on the ____ day of _____, 2010.

Signed: _____.

Printed: _____.

Respectfully Submitted,

DAVID BOLIN



By:

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