IN THE CHANCERY COURT OF COUNTY, MISSISSIPPI

PLAINTIFF

VS. CIVIL ACTION NO.

DEFENDANTS

DEFENDANTS RESPONSES AND OBJECTIONS TO PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

COMES NOW, Defendants, and , by and through their attorney of record, in responding to Plaintiff's First Request for Production of Documents to Defendants, and states as follows:

REQUEST FOR PRODUCTION NO. 1: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of , d/b/a from through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 1:

REQUEST FOR PRODUCTION NO. 2: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of from through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 2:

REQUEST FOR PRODUCTION NO. 3: Bank statements, cancelled checks, pass books, deposit slips, and all other written documents pertaining to checking or savings accounts of and/or for the period through .

RESPONSE TO REQUEST FOR PRODUCTION NO. 3:

REQUEST FOR PRODUCTION NO. 4: Books and records, including financial reports, inventories, equipment lists, insurance policies, invoices, and all other written documents pertaining to the business operations of , d/b/a and from through

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Brendan G. Carr

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presented in four sections counsel's role which includes chapters on written and oral advocacy document production the use of evidence means of shaping an arbitration and how to work with and lead a team the tribunal s role which includes chapters on responding to the nomination arbitrators duties the hearing weighing evidence drafting orders and awards and correction and clarification the institution s role which includes chapters on distinctions between institutional and ad hoc arbitrations the secretariat's role appointing arbitrators advances on costs and scrutiny of arbitral awards and how arbitration is funded which includes chapters on calculating costs third party funding and attorney s fees How this will help you Practitioners and users alike will benefit from the practical presentation of all stages of international arbitration and will be able to approach any case with a full understanding of the potential procedure strategies and tactics to be employed thanks to the authors thorough consideration of the real world practicalities Editors Courtney Lotfi Alicja Zielinska Eisen and Ver nica Sandler Obreg n Electronic Disclosure in International Arbitration David J. Howell, 2008 International arbitration faces the challenge of the exponential increase in the volume of electronically stored information While there has been a convergence in the accepted scope of disclosure in international arbitration chiefly reflected in the IBA Rules on Evidence there is widespread concern about the potential burdens of disclosure of electronic documents with regard to the litigation experience Arbitrators are rapidly having to come to terms with these issues in an arbitration context in order to meet the needs and expectations of the parties A number of arbitration institutions are currently considering rule changes or protocols to address the disclosure of electronic documents This publication analyses the procedural practical and technical issues and addresses the appropriate approach to electronic disclosure in international arbitration including those lessons and

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