

CASE NAME: People ex rel Spooner, et al. v Pacifica Foundation, et al.

CASE NO.: 831252-3

Deposition Subpoena For Production of Business Records

To Custodian or Records, IPSA, International.

“Attachment 3”

1. Any and all documents related in any way to any services you provided to Pacifica Foundation from January 1, 1999 to current, including, without limit, all writings of any kind, including the originals and all non-identical copies, whether different from the originals by reason of notation made on such copies or otherwise, including without limitation, correspondence, memoranda, notes, appointments calendars, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, interoffice and intra-office communications, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer print-outs, teletypes, telefax, invoices, worksheets, all drafts, alterations, modifications, changes, and amendments of any of the foregoing, graphic or oral records or representations of any kind (including, without limitation, photographs, charts, graphs, microfiche, microfilm, videotapes, recordings, motion pictures), and any electronic, mechanical, or electric records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings, and computer memories).
2. Time records of all IPSA personnel in any way related to services IPSA International performed for Pacifica Foundation from January 1, 1999 to current.
3. Employment resumes of all IPSA personnel who performed services for Pacifica Foundation from January 1, 1999 to current.

4. Concealed weapons permits for all IPSA personnel who performed services for Pacifica Foundation from January 1, 1999 to current.

5.. Transmittal letters to any party to whom the originals or copies any of the documents referenced in No. 1, above, were transmitted by you.