

The

DugginS

Law Firm, LLC

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CITY CLERK

April 5, 2013

Marcia Moermond
City of St. Paul
310 City Hall
15 West Kellogg Blvd.
St. Paul, MN 55102

**RE: My client: John Norris, E.J. Liquidation
Assessment: 132006
File Number: J1307C**

DISCOVERY DEMAND

Dear Ms. Moermond,

I hereby make a request for discovery with respect to the above-named file. This request is made in relation to all applicable division and subdivisions of the Minnesota Rules of Civil Procedure.

This demand includes, but is not limited to the following items, whether written, generated or received, regardless of whose possession they are in, at this time including agencies, entities, and/or individuals who regularly report to your office about the City of St. Paul's activities of this nature, or who have investigated any aspect of this matter, or have reported to the City of St. Paul about any aspect of this matter:

1. Any and all audio and video tapes of any portion of the investigation during, before and after the investigation regardless of who is in possession of the items;
2. All "field notes" and other notations and writings about this investigation, regardless of the authors and regardless of whether they were ever incorporated into a formal report of any type;
3. The names of all persons, who were either directly or indirectly, formally or informally, involved in the investigation in any way, regardless of who they were employed by at the time of their involvement in the investigation or its follow up;
4. Copies of tapes, or written transcripts, of all radio dispatch logs and all other audio records identifying the exact locations and activities of all persons, who were directly or indirectly, formally or informally, involved in the investigation or its follow up;
5. Copies of all records and reports of any employee of any entity, whether written, generated, or received as a result of the investigation or its follow up, including reports relevant to the arrival and activities of any city or county employee at the scene, at any time, before, during or after the investigation;
6. Copy of all reports pertaining to any evidence obtained by persons which was reviewed in arriving at a decision relative to the identity of persons responsible for the contamination ;
7. All of the files reviewed in determining the amount of the assessment and the alleged responsibility for the basis of the assessment, regardless of whose possession they are in;
8. Exact copies of all photographs, including digitally generated depictions, of the scene or of any persons or things, which any person may have relied on for any purpose, relative to the investigation, prior to, during, or after the investigation;

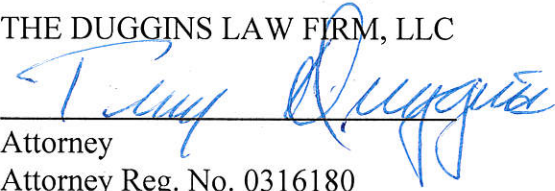
9. Complete, detailed information about any person, persons, or sources, confidential or non-confidential, including Concerned Citizens, who supplied any information prior to, during or after the investigation;
10. Copies of any statements made by any eye-witness, or any other persons, whether the persons are considered to be confidential sources, or not, relative to the investigation;
11. Copies of any Search Warrants and the accompanying affidavits.

Dated: 4-4-2013

Respectfully Submitted,

THE DUGGINS LAW FIRM, LLC

By:


Attorney

Attorney Reg. No. 0316180

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