

STATE OF MINNESOTA
COUNTY OF HENNEPIN

DISTRICT COURT
FOURTH JUDICIAL DISTRICT

Christopher Roller,

Case No.: 27-CV-09-22812

Plaintiff,

vs.

Wagner, Falconer & Judd, Ltd(WFJ) via Prepaid
Legal c/o Dan Smith

Responses to Christopher Roller
Document Requests to RKMC

Honorable Judge Mark Boris via WFJ and
Bosley and State of Minnesota

Attorney Alexander Gese via Bosley,

Defendant.

**To: Plaintiff Christopher Roller, *Pro Se*, 14806 Quentin Avenue South, Savage,
MN 55378**

Robins, Kaplan, Miller & Ciresi, L.L.P., by and through its counsel, responds to

“Christopher Roller Document Requests to Defendant RKMC” as follows:

REQUEST NO. 1:

Produce all documents relied on in answering all Interrogatories thus far or which relate to or substantiate your answers to those Interrogatories.

RESPONSE:

Robins, Kaplan, Miller & Ciresi L.L.P. (“RKMC”) is not a party in this action and, as such, has not submitted answers to interrogatories. For interrogatory answers it has co-signed with defendants, it relied on the complaint herein and upon public records including the court record in Case No. 080327031, Hennepin County District Court – Conciliation. Plaintiff has possession or access to these documents.

REQUEST NO. 2:

I need to know how to extract large sums of money from your company. Produce all documents showing funding sources for your company. Include all relationships to other companies providing financial influence in this lawsuit, prior/during/post lawsuit commencement.

RESPONSE:

Objection to the form of the request. It fails to comply with Minn. R. Civ. Pro. 26 and 34 and seeks documents outside the permissible scope of discovery.

REQUEST NO. 3:

Produce all documents that you propose to use during the preparation for or litigation of this matter and all documents that you believe support your claims.

RESPONSE:

Objection to the form of the request. It fails to comply with Minn. R. Civ. Pro. 26 and 34 and seeks documents outside the permissible scope of discovery including attorney work product. Further, Robins, Kaplan, Miller & Ciresi L.L.P. is not a party in this action and, as such, has neither served an answer nor asserted claims.

REQUEST NO. 4:

Produce any document that you believe supports any aspect of the complaint or answer.

RESPONSE:

There are no documents that support the Christopher Roller complaint in this matter and no answer was served.

REQUEST NO. 5:

Produce any audio or visual recording related to the allegations in the complaint or answer.

RESPONSE:

None.

REQUEST NO. 6:

Produce all documents, including correspondence, expert reports and drafts of reports, which were prepared by each person whom you expect to call as an expert witness at trial and the data upon which said expert witness bases the opinions and conclusions contained therein.

RESPONSE:

None.

REQUEST NO. 7:

Produce all statements which were made by, or notes of or correspondence relating to discussions you have had with, any persons with knowledge of any facts alleged in your answer or facts that you believe support your claims.

RESPONSE:

Objection to the form of the request. It fails to comply with Minn. R. Civ. Pro. 26 and 34 and seeks documents outside the permissible scope of discovery including attorney work product. Further, Robins, Kaplan, Miller & Ciresi L.L.P. is not a party in this action and, as such, has neither served an answer nor asserted claims.

REQUEST NO. 8:

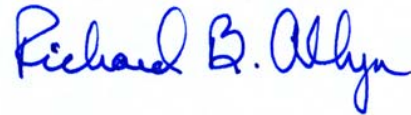
Produce all documents including, but not limited to, calendars, diaries, notes, memoranda, or correspondence that reference, summarize, describe, constitute or restate any conversations, interviews, or meetings you or your representatives have had with any individual (other than your attorney) concerning any fact or theory alleged in your answer.

RESPONSE:

Objection to the form of the request. It fails to comply with Minn. R. Civ. Pro. 26 and 34 and seeks documents outside the permissible scope of discovery including attorney work product. Further, Robins, Kaplan, Miller & Ciresi L.L.P. is not a party in this action and, as such, has served no answer.

DATED: January 23, 2010

ROBINS, KAPLAN, MILLER & CIRESI L.L.P.



By: _____

Richard B. Allyn, Atty. No. 1338

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ATTORNEYS FOR DEFENDANTS

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