

BRIAN D. BOURGOIN-TROTTIER

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SELF-REPRESENTATION

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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA**

K-BEECH, INC.,

Plaintiff,

vs.

**GEORGE HERNANDEZ, SHANNA
SHREIBER, RICHARD SAATHOFF,
BRIAN TROTTIER, and CATHERINE
VALDEZ**

Defendant.

^{BBT}
CASE NO. 2:11-CV-07604-NVW

**FIRST REQUEST FOR PRODUCTION
OF DOCUMENTS SERVED ON
PLAINTIFF BY BRIAN BOURGAIN-
TROTTIER**

Defendant requests that Plaintiff produce documents or things designated on the following list be produced for inspection and copying, pursuant to Rule 34, *Federal Rules of Civil Procedure*. The party upon whom this Request is served shall serve a written response within thirty (30) days following the date of service of this request by certified mail to Defendant Brian D. Bourgain-Troitter as address on this pleading.

The documents or things sought by this Request include electronic reports documents and things in the possession, custody or control of the party or person, their attorney and all agents, servants, representatives, investigators, and others who may have obtained custody of the

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1 documents and things on behalf of the Plaintiff or its attorney.

2 Each party upon whom this Request is served is hereby notified that should such party fail
3 to comply with this Request, or any part thereof, then the undersigned party may seek sanctions
4 pursuant to Rule 37, *Federal Rules of Civil Procedure*.

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6 **DEFINITIONS**

7 1. "Plaintiff," "you," or "your" means the party to whom this discovery request is
8 submitted, and includes that person's legal agents (e.g. attorney, employee, representative, etc.).

9 2. "Person" includes both individuals and business entities.

10 3. "Document" includes all electronic media or other tangible forms in which
11 information is stored, and includes all written or graphic matter of every kind and description,
12 however produced or reproduced (whether draft or final, original or reproduction). *The*
13 *term "document" also includes all copies of a document which contain any additional writing,*
14 *underlining, notes, deletions, or any other markings or notations, or are otherwise not identical*
15 *copies of the original.*

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17 **DOCUMENTS TO BE PRODUCED**

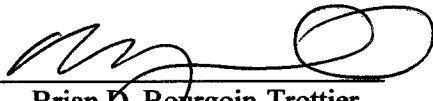
- 18
19 1. Certificate of Registration for Copyright of Virgin 4 issued by US Copyright Office.
20 2. All income statements reflecting sales of Virgin 4 from date of first publication to the date
21 of this request.
22 3. All receipts for sales of Virgin 4 beginning February 1, 2011 to the date of this request.
23 4. All receipts evidencing production costs for Virgin 4.
24 5. Legal Service Agreement covering this litigation.
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6. Federal Income Tax Filings for tax years 2010 and 2011.
7. All documents containing information upon which you base your claim for damages including lost profits, sale erosion and financial depletion arising from the allegations contained in the Amended Complaint.
8. All electronic data supporting the allegations in the Amended Complaint.
9. All electronic data evidencing internet traffic to websites, shopping carts upon which Virgin 4 is listed for sale.
10. All contracts existing with media distributors, video stores, book stores, movie theaters and retail stores and outlets which enable commercial entities to sell, distribute, lease, rent or otherwise display Virgin 4 to the public.

Date: 12/30/11

By: 
Brian D. Bourgoin-Trottier,
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ORIGINAL of the foregoing served
by regular mail on this 30 day
of December, 2011 to:

Ryan J. Stevens, Esq.
Stevens Law Office, PLC
309 N. Humphreys Street
Suite 2
Flagstaff AZ 86001

By: 

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