

IN THE COURT OF COMMON PLEAS OF PIKE COUNTY
COMMONWEALTH OF PENNSYLVANIA

Concerned Citizens of Sunrise Lake, Inc., a Non-Profit Pennsylvania Corporation,	:	
	:	
Plaintiff,	:	No. 42 CV 2007
	:	
v.	:	
	:	
Sunnylands, Inc. a Pennsylvania Corporation and Sunrise Ventures Inc., a Pennsylvania Corporation,	:	ACTION IN EQUITY
	:	
Defendants.	:	

INTERROGATORIES PROPOUNDED BY PLAINTIFF ON DEFENDANT

PURSUANT TO THE PROVISIONS of Pa. R.C.P. 4005 and 4006, as amended, you are required to serve on the undersigned your Answers and Objections, if any, in writing, to the following Interrogatories, within thirty (30) days after service of the Interrogatories.

The Answers shall be inserted in the spaces provided following each Interrogatory. If there is insufficient space to answer an Interrogatory, the remainder of the Answer shall follow on a supplemental sheet.

These Interrogatories shall be deemed to be continuing in nature, in accordance with the provisions of Pa. R. C. P. 4007.4 as amended. If, between the time of serving your original Answers to these Interrogatories and the time of trial of this matter, you or anyone acting in your behalf learn the identity of persons expected to be called as expert witnesses at trial not disclosed in your Answers, or if you or an expert witness obtain information upon the basis of which you or he knows that an Answer was incorrect when made, or knows that an Answer though correct when made is no longer true, then you shall promptly supplement your original Answers under oath to include such information thereafter required, and promptly furnish such a Supplemental Answer on the undersigned.

1. State the name and address of the person answering these interrogatories.

2. Set forth below the name and address of each and every shareholder of Sunnyland's Inc. from the incorporation date to the present time.

3. Set forth below the name and address of each and every shareholder of Sunrise Ventures, Inc. from the date of incorporation to the present time.

4. Set forth below the names of all officers of Sunnylands, Inc. from the date of incorporation to the present time.

5. Set forth below the names and addresses of each and every officer of Sunrise Ventures, Inc. from the date of incorporation to the present time.

6. Set forth below whether Sunnylands, Inc. has retained an accountant from the time of its incorporation to the present date. If so, set forth the name and address of such accountant and the period of time in which the accountant was engaged by Sunnylands, Inc.

7. Set forth below whether Sunrise Ventures, Inc. has retained an accountant from the time of its incorporation to the present date. If so, set forth the name and address of such accountant and the period of time in which the accountant was engaged by Sunrise Ventures, Inc.

8. Set forth below the name and address of the accountant or individual who prepared income tax returns for Sunnylands, Inc. for the years 2003, 2004, 2005 and 2006.

9. Set forth below the name and address of the accountant or individual who prepared income tax returns for Sunrise Ventures, Inc. for the years 2003, 2004, 2005 and 2006.

10. Set forth the name and address of each and every employee of Sunnylands, Inc. for the years 2003, 2004, 2005 and 2006.

11. Set forth the name and address of each and every employee of Sunrise Ventures, Inc. for the years 2003, 2004, 2005 and 2006.

12. Set forth the name of each and every financial institution utilized by Sunnylands, Inc. for 2003, 2004, 2005 and 2006.

13. Set forth the name of each and every financial institution utilized by Sunrise Ventures, Inc. for 2003, 2004, 2005 and 2006.

14. With respect to paragraph 29 of the Answer to the Complaint, set forth below what “reasonable efforts” were utilized to collect overdue assessments.

NEWMAN WILLIAMS MISHKIN
CORVELEYN WOLFE & FARERI, PC

Date: March 8, 2007

By: _____
JAMES V. FARERI
Attorney ID No. 34402
Attorney for Plaintiff
712 Monroe Street
Stroudsburg, PA 18360
(570) 421-9090

CERTIFICATE OF SERVICE

James V. Fareri, Esq. hereby certifies that on March 8, 2007, a true and correct copy of the Interrogatories Propounded by Plaintiff on Defendant was mailed to the Defendant's counsel:

Brian P Seaman, Esq.
Stradley Ronon
2600 One Commerce Square
Philadelphia, PA 19103-7098

by ordinary first class mail and certified first class mail, postage prepaid.

NEWMAN, WILLIAMS, MISHKIN,
CORVELEYN, WOLFE & FARERI, P.C.

JAMES V. FARERI, ESQ.
Attorney ID No. 34402
Attorneys for Plaintiffs