

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.	:	

PLAINTIFF’S REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE THAT, pursuant to Pa. R.C.P. 4009, you are required to furnish at our office, on or before thirty (30) days of service hereof, a photostatic copy or like reproduction of the materials concerning this action or its subject matter which are in your possession, custody or control and which are not protected by the attorney/client privilege; or, in the alternative, produce the said matter at said time to permit inspection and copying thereof:

1. Any and all invoices which correspond to the statement of “expenses” set forth on the “income statements” attached as Exhibit “A” to the Complaint, for the years 2003, 2004 and 2005.
2. The income statements/balance sheet for the period of January 1, 2006 to December 31, 2006.
3. Any ledgers maintained by Defendants for money collected from residents of Sunrise Lake.
4. Statements obtained from any accountant employed by you for years 2003, 2004, 2005 and 2006.

5. Bank account reconciliations statements for accounts in which money is collected from residents of Sunrise Lake or deposited, and/or from which expenses were paid for years 2003, 2004, 2005 and 2006.

6. Copies of any Complaints filed by you before a Pike County District Justice, or in the Pike County Court of Common Pleas, relating to unpaid Sunrise Lake assessments.

7. Copies of Federal Tax Returns for Sunnylands, Inc. for years 2003, 2004, 2005 and 2006.

8. Copies of Federal Tax Returns for Sunrise Ventures, Inc. for years 2003, 2004, 2005 and 2006.

9. Sunrise Ventures, Inc. checking account ledger for account corresponding to the statement of “job transactions” set forth as Exhibit “B” to the Complaint in the above matter.

10. Financial statements for Sunnylands, Inc. for Sunrise Ventures, Inc. for the years 2003, 2004, 2005 and 2006.

NEWMAN WILLIAMS MISHKIN  
CORVELEYN WOLFE & FARERI, PC

Date: March 8, 2007

By: \_\_\_\_\_  
JAMES V. FARERI  
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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 Plaintiff's Request for Production of Documents 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.

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Attorneys for Plaintiffs