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6	Attorneys for Defendant, AMERICAN ENVIRONMENTAL GROUP			
7				
8	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
9	FOR THE COUNTY OF SAN BERNARDINO			
10		1		
11	LINDA AYRES,		Case No.: CIVSB2106284	
12	Plaintiff(s),		Assigned to the Hon. Bryan Foster Dept.S22	
13	v.			
14	STATE FARM GENERAL INSURANCE COMPANY, a Corporation; CONTRACTOR CONNECTION, a Corporation; PAUL DAVIS RESTORATION, INC., a Corporation; SERVPRO INDUSTRIES, INC., a Corporation; AMERICAN ENVIRONMENTAL GROUP, A MCLARENS COMPANY, a Corporation; DOES 1 through 50, inclusive, Defendant(s).		AMERICAN ENVIRONMENTAL GROUP'S REQUEST FOR PRODUCTION OF DOCUMENTS FROM PLAINTIFF LINDA AYRES, SET	
15				
16			Action Filed: February 22, 2021 Trial Date: None Set	
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18				
19				
20				
21				
22	PROPOUNDING PARTY:	Defendant AMERICAN ENVIRONMENTAL GROUP		
23	RESPONDING PARTY:	Plaintiff LI	Plaintiff LINDA AYRES	
24	SET NO.:	Nine (9)		
25	In accordance with California Code of Civil Procedure §§2033.010, you, LINDA AYRES			
26	("YOU") are hereby requested by Defendant AMERICAN ENVIRONMENTAL GROUP ("AEG")			
27	to identify, individually and separately, in writing and under oath, within 30 days from the date of			
28				
	DEEENDANT AMEDICAN EN	JVID ONMENT	1 AL CROUP'S REQUEST FOR PRODUCTION OF	
	DEFENDANT AMERICAN ENVIRONMENTAL GROUP'S REQUEST FOR PRODUCTION OF DOCUMENTS FROM PLAINTIFF LINDA AYRES, SET NINE			

service hereof, each document, paper, book, account, letter, object or thing in YOUR possession, custody or control falling within the category of each item specified below.

YOU are further requested, pursuant to California Code of Civil Procedure § 2031.280, to produce and permit the inspection, and copying or photographing of each such identified document, object or thing at the offices of AEG's attorneys of record located at BOOTH LLP, 16835 W. Olympic Blvd., Suite 600E, Los Angeles, CA 90064.

California Code of Civil Procedure §§ 2031.210 – 2031.260 require that YOU, within thirty (303) days after service of this inspection demand, serve the original verified response to the party making the demand, including a statement that the production, inspection and related activity demanded will be allowed, either in whole in part, and that all documents or things in the demanded category which are in the possession, custody or control of that party, and to which no objection is being made, will be included in the production. Further, a representation of inability to comply with the particular demand for inspection shall affirm that a diligent search and a reasonable inquiry has been made in an effort to comply with that demand.

If a document or documents responsive to the following requests are withheld on the basis of privilege, YOU are further required to serve with YOUR responses, a privilege log identifying the document withheld, and the basis upon which YOU are claiming a privilege.

In lieu of an appearance and produce documents at the time specified, SCE will accept photocopies and duplicate prints of such documents or tangible things produced to its attorneys prior to the date set above.

DEFINITIONS

As used herein, the term "DOCUMENT" means any "writings' as defined in California
Evidence code section 250; each "original as defined in California Evidence Code section 255; and
each "duplicate" as defined in California Evidence Code section 260, including any facsimiles,
electronic records, film records or production in YOUR possession or known to YOU on usual
inquiry. If any writing has been prepared in more than one copy and any copy was not or is no longer
identical with the original by reason of simultaneous or subsequent notation or modification of any
kind, each non-identical copy must be included.

By way of illustration, the term "DOCUMENT" includes, without limitation, all originals (or copies if the originals are not in the possession of plaintiffs or expert deponents), non-identical copies (whether by reason of alterations or of marginal notes, including those made on "Post-Its" or their equivalent) of all typed, printed, pictorial or graphic matter, however produced or reproduced, of every kind and description, including but not limited to records, correspondence, telegrams, notes, calendar pages, checklists, sound recordings of any type, memoranda, reports, written analyses, contracts, supplements, amendments and modifications of each contracts, licenses, agreements, illustration, diagrams, instructions, photographs, films, videotapes, electronic or magnetic tapes, computer printouts, reports, books, and job or transaction files, records of telephone conversations, meetings or minutes of any meetings, or anything similar to any of the foregoing, however denominated by the deponent, as well as all drafts of the foregoing.

2. As used herein, the terms "YOU" and "YOUR" refer to the Plaintiff LINDA AYRES and to any other current or former affiliated organization, person or entity and/or any officer, employee, agent, representative, attorney or other person acting on behalf of the deponent, or such affiliated organization, person or entity.

3. As used herein, the term "COMPLAINT" refers to YOUR lawsuit, Case No.: CIVSB2106284.

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 66:

All DOCUMENTS YOU identified in YOUR response to AEG's Form Interrogatory No. 17.1, served concurrently.

DATED: October 17, 2022

BOOTH LLP

By:

Scott Areene

Jason M. Booth Scott G. Greene Attorneys for Defendant AMERICAN ENVIRONMENTAL GROUP

DEFENDANT AMERICAN ENVIRONMENTAL GROUP'S REQUEST FOR PRODUCTION OF DOCUMENTS FROM PLAINTIFF LINDA AYRES, SET NINE