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Honorable Samuel J. Steiner

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

IN RE:

MICHAEL R. MASTRO,

Debtor.

BANKRUPTCY NO. 09-16841 (Ch. 7)

JAMES F. RIGBY, JR., Trustee, solely in
his capacity as Chapter 7 trustee of the
bankruptcy estate of Michael R. Mastro,

Plaintiff,

ADVERSARY CASE NO. 09-01439-SJS

PLAINTIFF'S FIRST
INTERROGATORIES TO
THE LCY TRUST

v.

MICHAEL R. MASTRO and LINDA A.
MASTRO; MICHAEL K. MASTRO and
JANE DOE MASTRO, husband and wife
and the marital community composed
thereof; LCY, LLC, a Delaware limited
liability corporation; MASTRO
REVOCABLE LIVING TRUST; MASTRO
IRREVOCABLE TRUST; LCY, LLC-
SERIES HOMES; LCY, LLC-SERIES
JEWELRY; LCY, LLC-SERIES
AUTOMOBILES; THE LCY TRUST, a
trust purported to be formed in Belize;
COMPASS TRUST CORPORATION, a

1 trust of unknown origin using an address
2 in Belize City, Belize; COMPASS S.A.;
3 CONCEPT DORSSERS, a purported
4 Monaco company; and FOUNDATION
MANAGEMENT INC., a Washington
corporation,

5
6 Defendants.

7 Plaintiff requests that defendant LCY TRUST answer the following
8 interrogatories within thirty (30) days of service in accordance with
9 Fed. R. Civ. P. 33. These interrogatories seek all information available to the
10 responding party, whether such information is within the responding party's
11 personal possession or held by accountants, lawyers, banks or other accessible
12 sources.
13

14 DEFINITIONS

15 As used in these interrogatories, the following words and phrases
16 shall have the following meanings:
17

18 A. Identify. "Identify," when used in reference to a person,
19 means to state that person's full name, most recent business and residence
20 address, and most recent business title.
21

22 B. Identify. "Identify," when used in reference to an entity,
23 means to state the complete name and address of the entity, together with the
24 names and titles of any representatives of the entity known to you.
25

26 C. Or. The term "or" should not be read to eliminate any part of

1 any request but, whenever possible, should be used in the sense that the phrase
2 "and/or" is normally used.

3 D. Relating. A communication or document "relating" to any
4 given subject means any communication or document that constitutes, contains,
5 embodies, reflects, identifies, states, refers to, deals with, or is in any way
6 pertinent to that subject, including, without limitation, documents concerning the
7 preparation of other documents.
8

9 E. Defendant Mastro Entities. "Defendant Mastro Entities"
10 means the Mastro Revocable Living Trust, the Mastro Irrevocable Trust, the LCY
11 Trust, LCY LLC, LCY LLC - Series Home, LCY LLC - Series Jewelry, and LCY
12 LLC - Series Automobiles.
13

14 F. Compass Entity. "Compass Entity" means Compass Trust
15 Corporation, Compass S.A., Compass Group International, Compass Group
16 Corporate Services, Compass Group Belize, Compass NorthAmerica, Compass
17 Insurance Managers, or any affiliated person or entity.
18

19 **INTERROGATORIES**

20 INTERROGATORY NO. 1: Provide a detailed statement of all of the
21 current assets and liabilities of the LCY TRUST, including all account names and
22 numbers.
23

24 RESPONSE:
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INTERROGATORY NO. 2: Identify the custodian of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 3: Provide complete information regarding the location of each asset of the LCY TRUST.

RESPONSE:

INTERROGATORY NO. 4: Provide a complete list of all transfers of assets into and out of the LCY TRUST from the time the trust was formed to the present, including the date of the transfer, a description of the asset, its estimated value, the identity of the transferor, and the identity of the transferee.

RESPONSE:

INTERROGATORY NO. 5: Identify all past and present trustees of the LCY TRUST, including the dates during which each trustee served as trustee.

RESPONSE:

INTERROGATORY NO. 6: Identify all past and present Protectors of the LCY TRUST, including the dates during which each Protector served as

1 Protector.

2 RESPONSE:

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INTERROGATORY NO. 7: To the extent not identified in response to preceding interrogatories, identify all persons and entities who at any time have had authority to act on behalf of the LCY TRUST, or to make or veto decisions on behalf of the LCY TRUST, whether acting alone or in concert with other persons or entities, including the dates during which such authority was held.

RESPONSE:

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INTERROGATORY NO. 8: Provide a list of all attorneys who have represented the LCY TRUST from the date the trust was formed until the present, including the dates during which each attorney represented the trust.

RESPONSE:

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INTERROGATORY NO. 9: State the source of all payments made to each attorney who has represented the LCY TRUST, including counsel of record in this litigation.

RESPONSE:

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INTERROGATORY NO. 10: Provide a list of all insurance policies for which the LCY TRUST is a named insured or beneficiary.


RESPONSE:

INTERROGATORY NO. 11: Provide a complete list of all payments made by or at the direction of the LCY TRUST for the benefit of Michael R. Mastro, Linda A. Mastro, or any of the Defendant Mastro Entities.

RESPONSE:

DATED this 4th day of February, 2010.

HALL ZANZIG CLAFLIN
McEACHERN PLLC

By 
Spencer Hall, WSBA No. 6162
Janet D. McEachern, WSBA No. 14450

BUSH STROUT & KORNFELD
Gayle E. Bush, WSBA No. 7318
Christine M. Tobin, WSBA No. 27628

Attorneys for Plaintiff James F.
Rigby, Jr., Chapter 7 Trustee of
the Bankruptcy Estate of Michael R.
Mastro

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ANSWERS dated this _____ day of March, 2010.

DAVIS WRIGHT TREMAINE LLP

By _____
Richard J. Schroeder, WSBA No. 11958
Attorneys for Defendant LCY Trust

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VERIFICATION

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

_____ , being first duly sworn on
oath, deposes and says:

That he/she is the _____ of LCY TRUST, and is
authorized to verify answers to interrogatories herein; and that he/she has read
the foregoing answers to Plaintiff’s First Interrogatories to the LCY TRUST, knows
the contents thereof, and believes the same to be true.

SUBSCRIBED AND SWORN to before me this _____ day of March,
2010.

(Signature of Notary)

(Printed Name)

Notary Public in and for the State of
Washington, residing at _____
My Commission expires: _____