

PRODUCTION REQUEST

1. JANE DOE's original passport of which FRED L. ABRAMS, ESQ. (or his representative), may possess for a period of not more than 45 minutes to photocopy and return to JANE DOE.
2. All paid and unpaid invoices from creditors arising from obligations incurred by JANE DOE for the period January 1, 2014 to present.
3. All of JANE DOE's telephone records, (including cell phone records), for the period of January 1, 2014 to date.
4. Receipts and copies of airplane tickets for all air flights JANE DOE traveled, during January 1, 2014 up to the present date.
5. All frequent flyer miles statements relating to any air flights JANE DOE traveled, during January 1, 2014 up to the present date.
6. Receipts or documents relating to all hotel accommodations JANE DOE paid for or hotels JANE DOE stayed at anytime during the period of January 1, 2014 to the present.
7. All records and documents relating to any transaction entered into on or after January 1, 2014 in which JANE DOE presently has or will have a financial interest or from which JANE DOE has received or will receive compensation of any nature.
8. All documents related to any transaction since January 1, 2014, entered into by another person or entity for the benefit in whole or in part, of JANE DOE.
9. All documents showing the amount, purpose or source of all payments over \$5,000.00 made since January 1, 2014, to, by or for the benefit of JANE DOE.
10. Copies of all of JANE DOE's current and previous wills and other estate planning documents.
11. All Internal Revenue Service Forms 3520, (Annual Return To Report Transactions With Foreign Trusts and Receipt of Certain Foreign Gifts), for years 2014 to the present, filed or executed by JANE DOE or on his behalf.
12. All Internal Revenue Service Forms 3520-A, (Annual Information Return of Foreign Trust With a U.S. Owner), for years 2010 to the present, executed or filed by or on behalf of JANE DOE or any entity he beneficially owns.
13. All Internal Revenue Service Forms 1041 (US Income Tax Return for Estates and Trusts (filed by fiduciar(ies) of domestic trusts). For years 2010 to the present,

executed or filed by or on behalf of JANE DOE or any entity he beneficially owns.

14. All Internal Revenue Service Forms 1041-NR (US Nonresident Alien Income Tax Return, filed by a trustee of a foreign trust). For years 2014 to the present, executed or filed by or on behalf of JANE DOE or any entity he beneficially owns.
15. All Financial Crimes Enforcement Network (a.k.a. FinCEN) Forms 114, Report of Foreign Bank and Financial Accounts (FBAR) or TD F 90-22.1 FBAR forms, executed or filed by or on behalf of JANE DOE for years 2014 to the present.
16. All documents related to any loans that JANE DOE or any entity he beneficially owns, has obtained from any person or entity since January 1, 2014 and a listing of all such loans.
17. A listing of all trips JANE DOE took outside of the State of New York any time during January 1, 2014 to present.
18. A list of all persons residing outside the State of New York with whom JANE DOE, (or an entity he beneficially owned), engaged in a business transaction, any time during the period January 1, 2014 to date.
19. A list of all persons residing outside the State of New York who have been to JANE DOE's place of residence or whose residence JANE DOE has been to, any time since January 1, 2014.
20. A list of all persons residing outside the United States with whom JANE DOE has communicated at anytime since January 1, 2014.
21. A list of any foreign or domestic trust(s) JANE DOE beneficially owned or formed or was employed by; was a grantor of; or was a beneficiary of; or was otherwise related to.
22. All insurance policies covering nonbusiness & business assets of JANE DOE from January 1, 2014 to present, including but not limited to, homeowners insurance policies, automobile insurance policies and personal umbrella policies.
23. All records relating to gifts, including but not limited to any gift tax returns, made by JANE DOE.
24. All bank statements, canceled checks, check registers, billing statements, receipts or other documents relating to financial accounts or credit cards or debit cards which JANE DOE beneficially owned or had signature authority over anytime during January 1, 2014 to the present.

25. All bank statements, canceled checks, check registers, billing statements, receipts or other documents for years January 1, 2014 to date, which relate to financial accounts or credit cards card or debit cards possessed by a business entity JANE DOE beneficially owned or had signature authority over.
26. All documents relating to monies or other assets which JANE DOE beneficially owned any time during January 1, 2014 to the present. This request includes without limitation all documents relating to the transfer of said monies or assets to any transferee.