

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

THREE ANGELS BROADCASTING CORPORATION

and

DANNY LEE SHELTON,

Plaintiffs,

vs.

GAILON ARTHUR JOY

AND

ROBERT PICKLE,

Defendants

C.A. No. 07-40098-FDS

DEFENDANT ROBERT PICKLE'S RULE 26(a)(1) DISCLOSURES

NOW COMES the Defendant, ROBERT PICKLE and hereby makes the following disclosures pursuant to Fed. R. Civ. P. 26(a)(1).

- (A) **The name, and, if known, the address and telephone number of each individual likely to have discoverable information that the disclosing party may use to support its claims or defenses, unless solely for impeachment, identifying the subjects of the information:**

Walter C. Thompson

██████████
Lake Geneva, WI 53147
██████████

Danny Shelton

██████████
West Frankfort, IL 62896

[REDACTED]
Brad Dunning
[REDACTED]

Gary & Barbara Hall
[REDACTED]

Bill & Charlotte Hopper
[REDACTED]

Greg Houseworth
[REDACTED]

Frank Pitts
Unknown

Vicki Barnard
[REDACTED]

West Frankfort, IL 62896
[REDACTED]

Alex Walker
[REDACTED]

Gary & Sherry Avery
[REDACTED]

Alice Loucks
[REDACTED]

Joel Noble
[REDACTED]

Dude & Judy Wood
[REDACTED]

Charlie & Sue Meadows
[REDACTED]

Jack & Pat Barwick
[REDACTED]

Johnston City, IL 62951
[REDACTED]

Ben Jordan

[REDACTED]

Holly Price
Unknown

Dorothy Mitchell

[REDACTED]

Leland Hale

[REDACTED]

Byford & Doris Barnard

[REDACTED]

West Frankfort, IL 62896

[REDACTED]

Roger Deason

[REDACTED]

Janet McLerren

[REDACTED]

D. Michael Riva
226 East Main St
West Frankfort, IL 62896
(618) 937-2404

Nick Miller

[REDACTED]

Follett, Herald

[REDACTED]

Hillsboro, OR 97124

[REDACTED]

Gerald Duffy
100 Washington Avenue South, Suite 1300
Minneapolis, MN 55401
(612) 337-6100

Larry Ewing

(618) 627-4651

Robert & Joan Russell

[REDACTED]

Bill Whittington

[REDACTED]

Ema Lou Shelton

(618) 627-4651

John Lomacang

[REDACTED]

Thompsonville, IL 62890-3416

[REDACTED]

(618) 627-2065 (wk)

Hal Steenson

[REDACTED]

Johnston City, IL 62951

[REDACTED]

Kenneth A. Denslow

619 Plainfield Rd., 3rd Floor

Willowbrook, IL 60521

[REDACTED]

Linda Shelton

[REDACTED]

(cell)

Everlina Germany

[REDACTED]

Brandy Shelton

Unknown

Brenda Walsh

[REDACTED]

Knoxville, TN 37922

[REDACTED]

(cell)

Fred Millea

[REDACTED]

Alyssa Moore
[REDACTED]

Gregory Matthews
(303) 399-8020 Ext. 2242
[REDACTED]

Kevin Paulson
[REDACTED]

Shelley Quinn
P.O. Box 220
West Frankfort, IL 62896
(618) 627-4651 (wk)

Melody Shelton Firestone
Unknown

Joe O'Brien
(618) 627-4651 (wk)

Nancy O'Brien
(618) 627-2065 (wk)

Leonard Westphal
[REDACTED]
Loma Linda, CA 92354
[REDACTED]

Ervin Thomsen
[REDACTED]

Kathi Bottomley
[REDACTED]

Frost, Trenton
[REDACTED]
Avon Park, FL 33825-7838
[REDACTED] (cell)

Lou Westphal
[REDACTED]

Hope LeBrun

[REDACTED]
Lake Isabella, CA 93240

Mark Finley

Cindy Tutsch

Harold Lance

[REDACTED]
Ukiah, CA 95482

Deb Young

[REDACTED]
Ypsilanti, MI 48198-9514

Ron Cristman
(301) 680-6450

David Everett
(618) 627-4651

Absher-Arnold Motors
3203 West DeYoung St.
Marion, IL 62959
(618) 993-5000

Ronnie & Teresa Shelton
[REDACTED]
Okmulgee, OK 74447

Greg Owen

Kenny Shelton
Unknown

Shelton, Steven & Melody

[REDACTED]

West Frankfort, IL 62896

[REDACTED]

Bruce & Tammy Chance

[REDACTED]

West Frankfort, IL 62896

[REDACTED]

Defendant Pickle reserve the right to supplement this list of witnesses from time to time as shall be appropriate.

- (B) **A copy of, or a description by category and location of, all documents, data compilations, and tangible things that are in the possession, custody, or control of the party and that the disclosing party may use to support its claims or defenses, unless solely for impeachment;**

See enclosed documents.

Other documents, primarily the writings of Bob Pickle or that have been sent to him, have been compiled and will be provided as an update to those enclosed here - but there is nothing known outside the category of such writings and, should another designation appear, this too will be updated.

- (C) **A computation of any category of damages claimed by the disclosing party, making available for inspection and copying as under Rule 34 the documents or other evidentiary material, not privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extent of injuries suffered;**

Defendant Pickle reserves the right to supplement this disclosure with his damages including the costs of defense of this frivolous action.

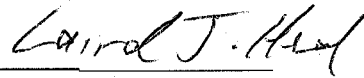
and

- (D) **for inspection and copying as under Rule 34 any insurance agreement under which any person carrying on an insurance business may be liable to satisfy part or all of a judgment which may be entered in the action or to indemnify or reimburse for payments made to satisfy the judgment.**

Insurance agreements for business and personal liability coverage exist to modest policy limits and the insurance carrier has disclaimed coverage. The policy agreements will be made available for inspection and/or copying.

Respectfully submitted,

Defendant Robert Pickle,
By his Attorney,



Laird J. Heal, BBO# 553901
3 Clinton Road
PO Box 365
Sterling, MA 01564
(978) 422-0135

July 20, 2007