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UNITED STATES DISTRICT COURT

DISTRICT OF MASSACHUSETTS

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Case No.: 07-40098-FDS

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

PLAINTIFF 3ABN'S RESPONSES TO DEFENDANT ROBERT PICKLE'S REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS TO PLAINTIFF THREE ANGELS BROADCASTING NETWORK, INC. (FIRST SET)

TO: Defendant Robert Pickle, *pro se*, 1354 County Highway 21, Halstad, MN 56548

Plaintiff Three Angels Broadcasting Network, Inc. (hereinafter "3ABN" or "Plaintiff") responds to Defendant Robert Pickle's Request for Production of Documents and Things (First Set) as follows:

OBJECTIONS

Unless otherwise indicated, each general objection applies to each Document Request whose response includes a reference to the general objection. The general objection applies to each and every Document Request if the general objection so states. Other objections made in response to specific Document Requests are in addition to the general objections and are made without waiving the general objections. Information provided in response to any Document Request is given without waiving any of the applicable general or specific objections and without waiving the right to supplement, change, or modify these responses at any time.

GENERAL OBJECTION NO. 1.

Plaintiff objects to the Document Request to the extent that it is overly broad, unduly burdensome, vague and general and seeks to impose an unreasonable and undue burden on Defendants.

GENERAL OBJECTION NO. 2.

Plaintiff objects to the Document Request to the extent that it seeks information that is irrelevant to this lawsuit and is not reasonably calculated to lead to the discovery of admissible evidence.

GENERAL OBJECTION NO. 3.

Plaintiff objects to the Document Request to the extent that it seeks information that is protected from disclosure pursuant to the attorney/client privilege and/or work product doctrine.

GENERAL OBJECTION NO. 4.

Plaintiff objects to each and every Document Request to the extent that it purports to impose a continuing duty greater than that required by Rule 26 of the Federal Rules of Civil Procedure.

GENERAL OBJECTION NO. 5.

Plaintiff objects to each and every Document Request to the extent that it seeks information or documents obtainable from some other source that is either more convenient, less burdensome, or less expensive as contemplated in Federal Rule of Civil Procedure.

GENERAL OBJECTION NO. 6.

Plaintiff objects to each and every Document Request to the extent that it refers to information or documents not now in Plaintiff's possession, custody or control. To the extent objected to, each Document Request seeks information which is irrelevant and answering it would impose an undue burden on Plaintiff to frame responsive answers.

GENERAL OBJECTION NO. 7.

Plaintiff objects to each and every Document Request to the extent that it calls for a legal conclusion.

GENERAL OBJECTION NO. 8.

Plaintiff objects to the "Definitions" set forth in the Document Requests as vague, overly broad, and assuming facts not in evidence. Specifically, definitions 4, 5, 10, 11, 12, 13, 14, and 16 are objected to on these grounds and answering any requests containing or incorporating these defined terms would impose an undue or impossible burden on Plaintiff to frame responsive answers.

3ABN's RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1: All minutes and other documents of the 3ABN Board for the entire length of time of 3BN's existence, and on an ongoing basis.

RESPONSE: P laintiff objects to this request as overly broad. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it seeks information that is not temporally relevant to the instant dispute and is not reasonably calculated to lead to the

discovery of relevant, admissible evidence related to the instant dispute. Notwithstanding and without waiving these objections, any relevant documents responsive to this request will be made available, subject to a confidentiality agreement or a protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 2: All minutes and other documents of all executive committee(s) of 3ABN, or subcommittee(s) of the 3ABN Board that pertain to concerns, discussions, investigations, actions, or decisions regarding any Plaintiff-related Issues, whatever is not included in Request No. 1. If less cumbersome, costly, or time-consuming for You, You may choose to produce all documents of such entities from January 1, 1991, onward for our inspection or copying.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 3: All minutes and other documents of all 3ABN departmental or division board(s), committee(s), subcommittee(s), or book committee(s), including those of 3BN Books, of 3ABN Music, and of any other departments or divisions, whether domestic or foreign, that pertain to concerns, discussions, investigations, actions or decisions regarding any Plaintiff-related Issues, whatever is not already included in Requests Nos. 1 or 2. If less cumbersome, costly, or time-consuming for You, You may choose to produce all minutes and other documents of such board(s), committee(s), or subcommittee(s) from January 1, 1991, onward for our inspection or copying.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 4: All reports or correspondence, such as letters, memos, notes, electronic mail, or other communication, or other documents authored, handled, read, reviewed, sent, or received by independent contractors who are relatives of Plaintiff Shelton, or by any 3ABN officer, director, department head, employee, or key employee, or any relative, agent, or

attorney thereof, whether past or present, that pertain to concerns, discussions, investigations, actions, or decisions regarding any Plaintiff-related Issues, the Defendants, Save3ABN.com, or any internet forum or other website containing concerns or criticism about one or both Plaintiffs, including but not limited to the open letters reported to be sent by Tommy Shelton or Carol Shelton to the Community Church of God in early 2007, the receipt for a pregnancy test purchased in 2004, and the trial transcript of the administrative hearing before Judge Barbara Rowe, whatever is not already included in Requests Nos. 1, 2, or 3. If less cumbersome, costly, or time-consuming for You, You may choose to produce from January 1, 1991, onward all documents for our inspection or copying that are associated in the stated ways to the stated individuals.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff also objects to this Request on the grounds that is seeks documents not in Plaintiff's possession, custody or control. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 5: All corporate documents, including but not limited to articles of incorporation, charters, by-laws, or annual filings, for 3ABN as 3ABN is defined under Definitions, including the originals and all revisions thereof, including but not limited to Three Angels Enterprises, LLC, Crossbridge Music, Inc., and all organizations related to 3ABN, including without limitation all such organizations formed in other countries, and documents identifying all 3ABN-related organization or 3ABN affiliates, whether or not consolidated, whether past or present, including without limitation 3ABN Latino, 3ABN Africa, 3ABN Australia, 3ABN Canada, 3ABN Nigeria, and 3ABN India.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant documents responsive to this request will be made available, subject to a confidentiality agreement or a protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 6: All revisions of employee handbooks pertaining to 3ABN as defined under Definitions, including but not limited to those of departments or divisions, and all

policies pertaining to accounting, finance, fraud, rental or sale of assets or things owned by or donated to 3ABN, and Plaintiff-related Issues. If less cumbersome, costly, or time-consuming for You, You may choose to produce all policies for our inspection or copying, along with all employee handbooks.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant documents responsive to this request will be made available, subject to a confidentiality agreement or a protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 7: All documents containing the 3ABN Story, all documents referencing a promised $100,000 donation of video equipment by Hal Steenson or his church or ministry, and all documents containing public or private admissions that the promised donation never took place.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 8: All issues of *3ABN World* (or its predecessor newsletter) and *Catch the Vision* from all years of 3ABN's existence, and issues of other periodical-type publications or catalogs from January 1, 1998, to the present, in machine readable format (PDF preferred) when extant, or in readable printed or scanned format otherwise.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, and vague. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Notwithstanding and without waiving these objections, any relevant documents responsive to this request will be made available, subject to a confidentiality agreement or a protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 9: For 3ABN as defined under Definitions, from 1998 onward, and for all years such statements were filed with any government entity or official, all financial statements, audited or not, with attached notes, supplementary information, and auditor's report, as applicable, all engagement, management, and management representation letters pertaining to auditor(s), all unredacted Form 990's or other applicable tax returns, including but not limited to those for Three Angels Enterprises, LLC, and Crossbridge Music, Inc., with all supporting schedules, statements, or forms, all documents and records which break down the figures for contributions on these documents into annual or monthly (a) amounts received in exchange for the sale of books, cassettes, videos, CD's, clothing, or other items, (b) amounts arising from charitable gift annuities or revocable trusts, (c) amounts arising from tithe Plaintiff Shelton or any other person (with sufficient detail to identify the amount of tithe coming from Plaintiff Shelton) and (d) amounts arising from contributions of other sorts, all documents that provide a basis for breaking down 3ABN income and expenses by related organization, including without limitation the 3ABN Sound Center, 3ABN Music, 3ABN Books, and 3ABN organizations in foreign countries, and all documents containing all detail associated with revenue and expenses on the Form 990's, financial statements, or related documents, that are categorized as "Auto," "Bad Debt," Inventory write-down," "Contract Labor," "Contributions receivable," "Cost of goods sold," or "given away" or any variation thereof, "Credit card fees," "Interest" expense, "Love gifts," "Miscellaneous," "Music production," "noncash" contributions, "Other changes in net assets" (line 20 of Form 990), "Other" expenses, "Other revenue," "School subsidy," or "Special projects," whether or not the categories containing expenses of these types are labeled exactly this way.

RESPONSE: Plaintiff objects to this request as overly broad, unduly burdensome, assuming facts not in evidence, vague, and argumentative. Plaintiff also objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff also objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant documents responsive to this request will be made available, subject to a confidentiality agreement or a protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 10: All documents which demonstrate the reconciled differences between the financial statements and the Form 990's produced under Request No. 9, including the line items comprising Total Assets for 2003, all documents that explain the $46,158 adjustment to net assets in 1999, that explain the $3,387,100 investment in land booked in 2002 and the adjustment to its value in 2005, and that explain any other adjustments, all documents that explain the change in accounting for sales of all items other than "satellites" between 2003 and 2004, all documents that give the detail for securities capitalized in 2005, the schedule required by line 54 of the 2005 Form 990, all documents pertaining to opinions or statements regarding independent contractors displaying the characteristics of employees or vice versa, all documents detailing grants, contributions, or payments, all documents or invoices, giving detail or not, for payments made to or received from Gray Hunter Stenn LLP, or any other external

auditor or firm performing auditing, accounting, or other financial services, and all documents pertaining to the dates or amounts of any cash carried overseas.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is not relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, vague, and assumes facts not in evidence. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 11: From January 1, 1999 onward, all records or other documents pertaining to contributions to 3ABN from any 3ABN director, officer, or member, whether personally or via DBA's, corporations, trusts, wills annuities, foundations, tax exempt organizations, or any other means, including without limitation records or other documents giving such detail as the amount of each contribution, to whom it was given, and the purpose of the contribution.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is not relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks documents not in Plaintiff's possession, custody or control. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 12: From January 1, 1998, onward, for 3ABN as defined under Definitions, organized and enumerated according to the division or entity thereof, if so kept, all documents, which list open bank, investment, credit or charge accounts, which list all employees, volunteers, or independent contractors (including amounts paid), which list all affiliates and their method of accounting, which list all "disqualified persons" in accordance with Internal Revenue Service guidelines, which list all real property holdings identified by parcel number or other means, and which list all individuals who have entered accounting journals to the general ledger

or any sub-ledger systems that update the general ledger activity on a regular basis, all statements for any open bank, investment, credit, or charge accounts, all documents containing charts of accounts, trial balances, account reconciliations for any balance sheet accounts, transaction level detail of gross rental income and expenses, with all associates lease agreements, and transaction level detail of inventory and cost of good sold (or "cost of goods given away" or variation thereof) accounts, all disbursement account and payroll account check registers. All documents pertaining to lists of fixed assets, including without limitation documents giving such detail as asset number, cost, accumulated depreciation, net book value, and physical location, all documents giving explanations for the transactional flows through inventory and fixed asset accounts as a result of annual physical counts and inspections, or documenting that such annual counts or inspections took place, all invoices for legal, investigative, or surveillance expenses, whether or not explicitly stated to be such on the invoice, all documents listing all split interest agreements, including details of their annual valuation adjustment, all documents pertaining to lists of vendors, including without limitation documents giving such detail as vendor name, vendor number, and amount paid by year, all documents pertaining to warehousing, inventorying, or fulfillment services either performed for individuals or entities other than 3ABN or concerning products that 3ABN does not own, and all documents identifying CD's of which Plaintiff Shelton is the producer. If less cumbersome, costly, or time-consuming for You, You may choose to produce all accounting records from January 1, 1998, onward for our inspection or copying.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is not relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 13: All email, correspondence, letters, reports, communications of any type recorded by any device, and all other documents from D. Michael Riva, Tim Neubauer, Nicholas Miller, Garrett L. Boehm, Fierst, Pucci & Kane, LLC, Siegel, Brill, Greupner, Duffy & Foster, P.A., or any other attorney or law firm, including without limitation those which have represented either Plaintiff in any matter since January 1, 2002, identifying the results or review of any audits or investigations, which either give or decline to give a clean bill of health, including without limitation all supporting reports or other documents upon which these law firms or attorneys may have relied.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the

accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks information that is not relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Notwithstanding and without waiving these objections, Plaintiff has no relevant, non-privileged documents responsive to this request.

REQUEST NO. 14: All reports, recordings, photographs, and other documents from all private investigative firms employed by or on behalf of either Plaintiff from 1999 onward.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 15: All email, correspondence, recordations, records or recordings of telephone conversations, or other documents that support or do not support the claim that how Seventh-day Adventist church leaders view 3ABN has been negatively impacted by the Defendants or Save3ABN.com, or the claim that church leaders have refused to hear the side of the Plaintiffs, including without limitation documents giving such detail as the name, address, and telephone number of each such church leader, and the date of any such contact.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that, having assumed facts not in evidence, it is vague. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 16: From January 1, 2000, onward, all email, correspondence, recordations, records or recordings of telephone conversations, or other documents pertaining to donors who have reduced or stopped giving, including without limitation documents giving such detail as the names, addresses, and telephone numbers of all such donors, the sums they stopped giving, the reason(s) they stopped giving, and the documented sums given each year for the previous seven years along with the intended purpose each gift was for.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 17: Whether concerning annuities or trusts negotiated or managed by the 3ABN Trust Department or its personnel, all documents describing or listing all charitable gift annuities by state of origin, copies of all required state registrations, the trust services log(s) recording trust services activity since January 1, 2000, all documents for charitable gift annuities originating in the state of Washington or naming Lottie Wiedermann as an annuitant, all invoices paid to Westphal Law Group or Lunsford & Westphal, the trust file of May Chung, and all trust office reports submitted to the corporate office.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, the accountant-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 18: All documents pertaining to the accounting procedures, policies (whether written or in practice), usage, or scheduling of the 3ABN Sound Center, and all documents pertaining to the accounting procedures or policies (whether written or in practice) regarding the use, sale, or disposal of donated items or assets, including without limitation the

method of arriving at a fair market value or sales price of each item or asset, and the issuing of receipts to donors or buyers of such items or assets.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 19: All documents pertaining to items buried on 3ABN property, other than electrical, plumbing, sewer, foundation, heating, or cooling, and all invoices, check copies, or other documents associated with the building of the school, gymnasium, and Angel Lane.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 20: All flight records and other documents associated with the purchase, sale, lease, rental, operation, depreciation, or maintenance of any 3ABN owned, leased, or rented aircraft, and all documents or records pertaining to reimbursements, or copies of check stubs reimbursing 3ABN, for any of these costs or expenses.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds

that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 21: All records or other documents pertaining to reimbursements, or copies of check stubs reimbursing 3ABN, for the cost of legal, investigative, or surveillance expenses incurred since January 1, 2003, including without limitation the examples listed under Plaintiff-related Issue "e."

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 22: All invoices or other documents concerning purchases of books or other items sold, manufactured, authored, produced, patented, inventoried, or copyrighted by any officer, director, employee, key employee, or independent contractor of 3ABN, or relative thereof, or relative of Plaintiff Shelton, whether purchased from that/those individual(s), D & L Publishing, DLS Publishing, Remnant Publications, Pacific Press, Media Opportunities IPTV, or any other individual or entity, and all editions and translations of *Ten Commandments Twice Removed,* including but not limited to that of the first printing.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 23: All records or other documents pertaining to 3ABN eBay.com sales, and to sales to any 3ABN director, officer, independent contractor, employee, or key employee, or any relative thereof, of any donated or purchased items or assets, identifying the donors of (if a donated item or asset) and recipients or buyers of such items or assets, or containing a description of reasonable particularity of such items or assets, or the appraised or recorded value or original price paid or final sales price (whichever of these are applicable to a particular case) of such items or assets, items or assets including but not limited to the piano that sold in 1998 for $2,000, and any antiques purchased by Shelley Quinn, and all documents pertaining to the calculation of the final sales price for the house sold to Plaintiff Shelton in 1998 as well as proof of payment for that house.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 24: All documents pertaining to statements made by Tommy Shelton, Plaintiff Shelton, or their relatives that relate to care for high blood pressure, heart disease, or any other ailment, but only in regards to ailments attributed to allegations made against either Tommy Shelton or Plaintiff Shelton, including but not limited to all documents pertaining to reimbursement or payment for expenses resulting from or in connection to such ailments.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by HIPPAA, the doctor-patient privilege, the attorney-client privilege, or the attorney work-product doctrine. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Notwithstanding and without waiving these objections, Plaintiff has no relevant, non-privileged documents responsive to this request.

REQUEST NO. 25: All documents pertaining to assets or cash either donated or sold below fair market value to government entities, including without limitation to towns, cities, and schools.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 26: All documents containing financial information or data not already enumerated that concern any Plaintiff-related Issue, and all documents not yet produced that would be produced in response to any of the above requests (including without limitation Request No. 9) if the end-of-year reports and audits for the current fiscal year were already completed.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege, accountant-client privilege, or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 27: All types of phone records or other documents enumerating phone calls made by 3ABN officers from January I, 2003, onward, whether printed or not, whether detailed or not, whether paid for or reimbursed by 3ABN or not, whether 3ABN is the account holder or not, indexed as to caller or account holder or account, and anything pertaining to discussions, investigation, or decisions regarding these records and documents, or fraction thereof, whatever is not already included in Requests Nos. 1 through 26.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it seeks

proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 28: All documents describing the relationship between 3ABN and the Seventh-day Adventist Church and its various entities, including but not limited to the compensation John Lomacang receives directly or indirectly from 3ABN, all documents establishing Mollie Steenson's membership of and length of tenure on the Executive Committee of the Illinois Conference of Seventh-day Adventists, and all documents consisting of communications, letters, memos, emails, agendas, or minutes arising from this relationship pertaining to Thompsonville Christian School, any other Seventh-day Adventist elementary school, or any campus of Broadview Academy, in regards to sexual misconduct or child molestation allegations, and the presence of any registered or convicted sex offenders on the campus of 3ABN.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 29: All contributions of text or dialogue, including but not limited to postings, publications, messages, or notes, that any director, officer, employee, key employee, independent contractor, or any relative or agent thereof (including but not limited to Gregory Scott Thompson, Ronnie Shelton, or Teresa Shelton) has made to any internet website, including but not limited to any chat-room, private or public discussion forum, blog, or bulletin board, including ClubAdventist.com, AdventistForum.com, BlackSDA.com, Maritime-SDA-Online.org, or ChristianForums.com, or any other website containing discussion about 3ABN, Plaintiff Shelton, the Defendants, Linda Shelton, Save3ABN.com, this litigation, any Plaintiff-related Issue, or any individual involved in any Plaintiff-related Issue, and any reports made by, record of payments made to, or correspondence to and from such individuals, whether direct or indirect, that are related in any way to any such contribution they have made to any such site.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably

calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 30: All documents provided to, created by, or otherwise relied upon by any expert you have retained or intend to retain, consulted or intended to consult, or expect to call at the trial of this matter related to the subject matter of the instant dispute or to any impression or opinion held by the expert.

RESPONSE: Plaintiff objects to this request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad. Notwithstanding and without waiving these objections, Plaintiff has no relevant, non-privileged documents responsive to this request. Plaintiff acknowledges its obligation to disclose the expert witnesses it intends to call at trial and will do so, if and when such experts are retained, in compliance with the Federal Rules of Civil Procedure and the Case Management Order of the Court.

REQUEST NO. 31: All documents, including recordings, statements, affidavits, notes or other documents setting forth, summarizing or memorializing any interview, examination, interrogation, discussion, or other communication with any person or entity concerning the subject matter of the instant dispute, the current litigation, or any Plaintiff-related Issue.

RESPONSE: Plaintiff objects to this request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, vague, and assumes facts not in evidence. Notwithstanding and without waiving these objections, Plaintiff has no relevant, non-privileged documents responsive to this request.

REQUEST NO. 32: All documents, including but not limited to documents pertaining to agreements, discussions, meetings, or minutes of meetings, regarding the anticipated merger with Amazing Facts, whether past or present, including suggestions, ideas, plans, or decisions about a constituency, and ASI or the McNeilus family's involvement with any aspect therewith.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it

seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome, and vague. Notwithstanding and without waiving these objections, Plaintiff has no relevant, non-privileged documents responsive to this request.

REQUEST NO. 33: All applications filed with the Federal Communications Commission, and all correspondence and documents pertaining to those applications and to the decisions made regarding those applications, all documents pertaining to the purchase or sale of television or radio stations, including without limitation board actions if not already produced, and all documents pertaining to the permit acquired by Yoneide Dinzey for K16E1 (later called KYUM) and to its sale to 3ABN by Yoneide Dinzey and then by 3ABN to Tiger Eye Broadcasting.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks information not in Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine(s). Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 34: All photographs (digital or film), slides, videotapes, films, moving pictures, DVD's, CD's, CD-ROM., MP3' s, cassettes, or other types of audio or video representations in Your possession pertaining to the 3ABN Story, to the instant dispute, to Plaintiff-related Issues, to the Defendants, to Save3ABN.com, to any internet forum or other website containing concerns or criticism about one or both Plaintiffs, or to allegations made against Linda Shelton since January 1, 2004, whether prior or after her dismissal, including but not limited to any photographs of a watch or watches, certain camp meeting broadcasts of May 2004, 3ABN Today LIVE broadcasts of August 10 and December 31, 2006, and February 15, 2007 (to ensure that Defendants' copies and Plaintiffs' copies are identical), any and all recordings of phone conversations of Linda Shelton or Arild Abrahamsen, any and all audio- or video-recorded evidence against Linda Shelton, including but not limited to the audio recording referred to by Hal Steenson, Plaintiff Shelton, and Harold Lance, and the video recording referred to by Kenneth Denslow on October 23, 2006, all documents referring to such audio and video recordings or the individuals who saw or heard them, all broadcasts in which Linda Shelton referred to a newfound friend or sent anyone secret messages, all broadcasts in which any allegations pertaining to

Plaintiff-related Issues were referred to explicitly or through innuendo, and any broadcasts or recordings that will be used for the Plaintiff's case.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information that is neither temporally nor substantively relevant to the instant dispute and is not reasonably calculated to lead to the discovery of relevant, admissible evidence related to the instant dispute. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Plaintiff further objects to this Request on the grounds that it is overly broad, unduly burdensome and vague. Due to the vagueness, overbreadth, and factually assumptive content of the request, Plaintiff is unable to formulate a reasonable response.

REQUEST NO. 35: Unredacted copies of all emails or other documents attached to the Affidavit of Mollie Steenson of May 9, 2007, all documents of any type that support the allegations of that Affidavit or of other court filings in the instant dispute, including but not limited to documents supporting the allegations that disparaging commentary first erupted on the internet in June 2006 as alleged by that Affidavit's ¶ 4 (or around July 2006 as alleged by ¶ 3 of the Affidavit of Larry Ewing of May 9, 2007), that donations began to decline in June 2006 as alleged in that Affidavit's ¶ 4 (or in July 2006 as alleged by ¶ 8 of the Affidavit of Larry Ewing), that donors have stopped donating to 3ABN specifically because of rumors pasted on Save3ABN.com, as alleged in that Affidavit's ¶ 5, that Save3ABN.com was the source of any information in the letter published by *Adventist Today,* referred to in that Affidavit's ¶¶ 6-8, other than the child molestation and sexual misconduct allegations against Tommy Shelton, that the individual referred to in that Affidavit' s ¶ 8 was indeed a supporter of 3ABN, that demonstrates Save3ABN.com's role in persuading the South Pacific Division of Seventh-day Adventists to enact the moratorium referred to in that Affidavit's ¶ 9, that either Defendant had any knowledge of or involvement in the distribution of the postcards referred to in that Affidavit's ¶ 10, that 3ABN supporters have been confused as to the affiliation of Save3ABN.corn as alleged in that Affidavit's ¶ 11, and that Save3ABN.com contains documents that have been edited and commented upon in ways that lead the reader to inaccurate and defamatory conclusions, or that lead the reader to conclude that the original author maintained something by those documents that he or she in effect did not, claims made in ¶ 12 of that Affidavit, and all other emails that support or do not support the positions taken in any 3ABN or Plaintiff Shelton's court filings, whatever has not already been produced in response to Requests Nos. 1 through 34.

RESPONSE: Plaintiff objects to this Request on the grounds that it seeks information protected from disclosure by the attorney-client privilege or the accompanying work-product doctrine. Plaintiff further objects to this Request on the grounds that it seeks proprietary trade secret or highly confidential business information. Notwithstanding and without waiving these objections, any relevant non-privileged documents responsive to this request will be made available, subject to a confidentiality agreement or protective order of the court, for Defendant Pickle's inspection at a date and time to be mutually agreed upon by the parties.

REQUEST NO. 36: All documents which You intend to use at trial or which are relevant to documents which You intend to use at trial, that are not already requests in Requests Nos. 1 through 35.

RESPONSE: Plaintiff has not yet determined which document(s) it intends to use at the trial of this matter and currently has no documents responsive to this Request. Plaintiff acknowledges its obligation to disclose its intended trial exhibits and will do so in Compliance with the Federal Rules of Civil Procedure and the Case Management Order of the Court.

ACKNOWLEDGMENT

Plaintiff acknowledges its ongoing obligation to supplement its Responses to Defendant Robert Pickle's Requests for Production of Documents and Things to Plaintiff Three Angels Broadcasting Network (First Set) pursuant to Federal Rule of Civil Procedure 26(e).

Respectfully Submitted:

Dated: January 9, 2008

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