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JERRIE M. HAYES 612-337-6142 jerriehayes@sbgdf.com

March 28, 2008

Mr. Robert Pickle 1354 County Highway 21 Halstad, MN 56548

Gailon Arthur Joy P.O. Box 1425 Sterling, MA 01564-1425

Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.

Gailon Arthur Joy and Robert Pickle Court Docket No. 07-40098-FDS Our File No. 24,681-D-002

Dear Mr. Pickle and Mr. Joy:

Pursuant to the March 10, 2008 Order of Magistrate Judge Timothy Hillman, enclosed and served upon you are documents described in Plaintiffs' 26(a)(1) Initial Disclosures totaling approximately 12,575 pages.

These documents have been provided to you without charge in electronic form on DVD for ease of shipping and convenience of review. If you desire the documents in hard copy form, please provide me written request, along with a check in the amount of \$3,243.75, for copying and shipping charges, made payable to Siegel, Brill, Greupner, Duffy & Foster, P.A..

Sincerely,

Jerrie M. Hayes

JMH/gkh



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JERRIE M. HAYES 612-337-6142 jerriehayes@sbgdf.com

April 25, 2008

Gailon Arthur Joy P.O. Box 1425 Sterling, MA 01564-1425

Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.

Gailon Arthur Joy and Robert Pickle Court Docket No. 07-40098-FDS Our File No. 24,681-D-002

Dear Mr. Joy:

Enclosed and served upon you, please find a CD containing information provided to Plaintiffs by BlueHost in response to the subpoena duces tecum served upon that company.

Sincerely

Jerrie M. Hayes

JMH/mmh Enclosure



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100 Washington Avenue South
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JERRIE M. HAYES 612-337-6142 jerriehayes@sbgdf.com

May 14, 2008

Mr. Robert Pickle 1354 County Highway 21 Halstad, MN 56548

Gailon Arthur Joy P.O. Box 1425 Sterling, MA 01564-1425

Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.

Gailon Arthur Joy and Robert Pickle Court Docket No. 07-40098-FDS Our File No. 24,681-D-002

Dear Mr. Pickle and Mr. Joy:

Enclosed and served upon you please find Confidential documents identified in Plaintiffs' Rule 26(a)(1) Initial Disclosures (constituting the remainder of Plaintiffs' (26)(a)(1)-identified documents) and produced in response to Judge Hillman's Order of April 17, 2008. Please note that this production includes only one "Mending Broken People" DVD and "Ten Commandments" book, but both are provided in their original format.

Sincerely,

Jerrie M. Hayes

JMH/gkh Enclosures



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JERRIE M. HAYES 612-337-6142 jerriehayes@sbgdf.com

May 27, 2008

VIA FAX & U.S. MAIL

Mr. Robert Pickle 1354 County Highway 21 Halstad, MN 56548

Re: Three Angels Broadcasting Network, Inc. and Danny Lee Shelton vs.

Gailon Arthur Joy and Robert Pickle Court Docket No. 07-40098-FDS Our File No. 24,681-D-002

Dear Mr. Pickle:

I write concerning your undated correspondence seeking a discovery conference related to the MidCountry Bank production and related to your potential filing of confidential 26(a)(1) documents produced by Plaintiffs. I am available any of the following dates and times for such a teleconference:

Thursday, May 29 - 3:00 p.m., 3:30 p.m. or 4:00 p.m. Tuesday, June 3 - 10:00 a.m., 11:00 a.m. or 3:00 p.m. Wednesday, June 4 - 9:30 a.m., 10:00 a.m. or 3:30 p.m.

Please let me know which date and time you choose, and I will advise you of the telephone number where I will be reachable during that time.

I also write concerning Plaintiff's production of documents in response to Mr. Pickle's Requests for Production of Documents. In light of the overwhelming volume of information implicated by the Requests, much of which is extremely sensitive and highly confidential, Plaintiffs intend to produce relevant documents according to the following schedule:

June 13, 2008 Plaintiffs will produce all relevant, non-confidential and non-privileged responsive documents.

June 20, 2008 Plaintiffs will produce all relevant, confidential documents that do not contain donor-identifying information, pursuant to the discovery protocol of Magistrate Judge Hillman's April 17 Confidentiality and Protective Order.

EXHIBIT Z

May 27, 2008 Page 2

> June 27, 2008 Plaintiffs will produce all relevant, confidential documents containing donor-identifying information, with the donor-identifying information redacted as necessary, pursuant to the discovery protocol of Magistrate Judge Hillman's April 17 Confidentiality and Protective Order.

July 11, 2008 Plaintiffs will produce a privilege log identifying all relevant, privileged responsive documents.

These documents will be produced in CD-Rom format at no cost to Defendants. Should you require the documents in hard-copy form, please advise and we will make arrangements for Defendants' payment of copying and shipping costs.

If you have any objection to the production schedule or format described above, please advise me in writing on or before Friday, May 30, 2008.

JMH/gkh

Gailon Joy (via U.S. Mail) cc: