

1354 County Highway 21
Halstad, MN 56548
(218) 456-2568
June 18, 2008

Gregory Simpson
Siegel, Brill, Greupner, Duffy & Foster, PA
100 Washington Avenue South, Suite 1300
Minneapolis, Minnesota 55401

Counselor Simpson:

I am in receipt of your two letters of June 18, 2008.

Regarding your second letter, I would not call your unilateral production schedule "agreed upon," as we have not stipulated to it and a motion to compel is pending. Neither Mr. Joy nor myself have yet received your fax or letter that you stated in writing that you sent on June 6, 2008. We have therefore determined that you are factually challenged, and thus the motion to compel is warranted.

I have previously brought to your attention the documents that were abusively marked "Confidential." This is a clear example of an abuse of the confidentiality order. If they are not corrected within seven days, we must assume that you have decided to perpetuate your abuse, and we will file a motion seeking sanctions for this abuse of the confidentiality order.

My complaint that there are missing documents is fully mature. I cannot see how any of what you produced is relevant or responsive to my requests. And according to your production schedule, all non-confidential documents were supposed to be produced on June 13, 2008. You failed to produce any issues of *3ABN World*, *Catch the Vision*, or other mass-distributed newsletters. Simply put, no party can consider those confidential. Thus, it is indisputable that documents are missing that are not subject to confidentiality.

Regarding your first letter, Mr. Joy made clear to you by phone today that we will respond to your request regarding the two subpoenas, and while we feel that 30 days is definitely a reasonable amount of time, we will be serving you a response shortly. A review of the record demonstrates that a motion to compel on your part is out of order and sanctionable.

Do note though that both sides have pending or imminent motions that may impact issues of relevancy.

In return I would ask you to supplement your disclosures pursuant to Rule 26(e) by updating your witness list. At the very least, there are three new board members that have not been added. We would also request that you supplement your other disclosures.

Also, while we are talking about subpoenas, we would request that you produce all documents received in response to your subpoenas to Calvin Eakins (dba BlackSDA) and Linda Shelton.

Gregory Simpson
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Sincerely,

A handwritten signature in black ink that reads "Bob Pickle". The signature is written in a cursive, slightly slanted style.

Bob Pickle, *pro se*

cc: John Pucci via email and fax
Gailon Arthur Joy via email