

COMMONWEALTH OF MASSACHUSETTS

BARNSTABLE, SS.

SUPERIOR COURT

JESSE E. TORRES III)

JENNIFER J. ADAMS)

Plaintiffs)

vs.)

SOPHIE J. TORRES)

JESSE E. TORRES IV)

DEBTMERICA, LLC.)

DONALD F. TORRES)

Defendants)

Civil Docket # BACV2011-00433

**PLAINTIFF JESSE E. TORRES III's FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
FROM THE DEFENDANT JESSE E. TORRES IV**

Pursuant to Rule 34 of Massachusetts Rules of Civil Procedure, the Plaintiff Jesse E. Torres III hereby requests that the Defendant Jesse E. Torres IV, produce all of the Documents described herein which are in the Defendant's possession, custody or control.

Definitions

Properties shall mean the Properties as described in Exhibit "A" of the above-captioned action and to be further identified as; "*Grandma's House*" located at 345 Carriage Shop Road, East Falmouth, Barnstable County, Massachusetts, 02536, "*Horse Property*" consisting of 5+ acres of land located on Carriage Shop Road, Town of Falmouth Map 29, Sec 01, Parcel 009, Lot 000, Book 01121, Page 0060, and across the street from *Grandma's House*, and "*Uncle Fred's House*" located at 562 Waquoit Highway, East Falmouth, Barnstable County, Massachusetts, 02536, and is to also include the "*Florida Lots*" located at 420 NW. 20th St., Lee County, Florida, 33993-4100, Cape Coral Unit 39 Block 2726 PB, 16 PG 180 Lots 33 + 34, Book: 879 Page: 71. Further, it is to include the properties named herein as a group, individually or in any combination thereof.

Documents shall mean any Document, by its general meaning, and is to include, but is not limited to, whether in paper, electronic, email, facsimile, picture or any other form where the Document can show relevance to the requests made herein.

Receipts shall mean any receipt by its general meaning, and is to include, but is not limited to, any Document that is kept as a reminder, record of, or receipt, to show value, for the purpose of providing information for the IRS, keep company records, personal records, and in any other way to be referenced to show information of monies paid and/or information relating to monies paid by any party whether an individual, company, corporation, limited liability corporation, partnership, corporate partnership, business, group or association or any entity that would keep receipts as defined in this definition.

Companies shall mean the Defendant Debtmerica, LLC, Lendingpoint Mortgage Corporation of Santa Ana, California and Prime Advantage Funding Corporation of Santa Ana California or any other company, corporation, limited liability corporation, partnership, corporate partnership, business, group or association where Defendant Jesse E. Torres IV has a financial interest in, that is greater than or equal to 10% of the company, corporation, limited liability corporation, partnership, corporate partnership, business, group or association's outstanding stock. Companies is further to mean all Companies as stated herein, any single of the Companies defined herein, or any combination of Companies as defined herein.

Mother shall mean the mother of the Defendant Jesse E. Torres IV, know as Joanne S. Torres, Joanne Torres, or Joanne Stockwell, of Falmouth, Barnstable County, Massachusetts.

Declaration

Any Document withheld by you as it is claimed to be a privileged attorney-client work product, identify in writing, any and all such Documents withheld, and state the title of the document, date and time of its creation and a summary of its contents suitable for identification to the court record of this action. All such identifications shall be sent to the Plaintiff Jesse E. Torres III at his address on file of 562 Waquoit Highway, East Falmouth, MA 02536.

REQUESTED DOCUMENTS

1. Copies of any and all Documents that reference directly, or indirectly, the Properties as defined above, and/or Wells Fargo, including but not limited to, loans referencing the Properties, communication with contractors referencing the Properties, bids or proposals referencing the Properties, appraisals referencing the Properties, any minutes of meetings and/or company notes and/or records, emails, photos, letters, and/or correspondence by and between any persons who are partners, employees, agents or in any way associated with the Companies, including by and between, any related or non-related persons as defined in this paragraph, to any Companies that directly or indirectly reference the Properties..
2. Copies of any and all Documents that could be determined by a reasonable person to be Receipts for any expenses or records where these Receipts, records or reports originated in, or reference Calexico, California or San Felipe, Baja California North, Mexico, or any area within 100 miles of these geographic regions which is to include, but is not limited to, Receipts for travel to or from these geographic areas as defined in this paragraph, including but not limited to, gas, lodging, repairs, doctors visits, medications, drug store or hospital, car repairs, road service, food or any other items from said regions that reference any Receipts for expenses. Further, is to include; any minutes of meetings and/or any Companies notes and/or records, emails, photos, letters, and/or correspondence by and between any persons who are partners, employees, agents or in any way associated with any Companies and any related or non-related parties to any Companies that reference directly or indirectly, any Receipts for any expenses or records originating from these geographic areas as defined in this paragraph.
3. Any and all Documents to or from, or that reference directly or indirectly, the Defendant Donald F. Torres, the great uncle of Defendant Jesse E. Torres IV, any items mailed to Defendant Donald F. Torres by any Companies and/or the Defendant Jesse E. Torres IV. Further, is to include; any minutes of meetings and/or any Companies' notes, emails, photos, letters, and/or correspondence by and between any persons who are partners, employees, agents or in any

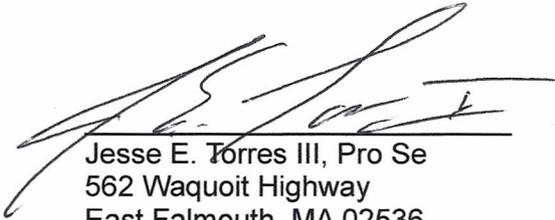
way associated with any Companies by and between, any related or non-related parties to any Companies that reference directly or indirectly, the Defendant Donald F. Torres.

4. Copies of any and all land line, cellular, internet phone communication and satellite phone records, including but not limited to United States phone records, Mexico phone records or any other phone records from any country, which shall include but not be limited to, Receipts, phone bills, or any other Document that could be reasonably construed to show incoming and/or outgoing phone call history, which is to include, but not be limited to, voice calls, fax calls and/or any other calls, that include or reference communications with Defendant Donald F. Torres. Further, to include but not be limited to, any notes, journals, reports or Documents that could be reasonably construed to be related to any of the aforementioned calls and/or communications by and between any persons who are partners, employees, agents or in any way associated with any Companies and/or any related or non-related person to any Companies that in any way directly or indirectly reference Defendant Donald F. Torres.
5. Copies of any and all Documents that could be determined by a reasonable person to be Receipts for any expenses or records where these Receipts, records or reports originated or reference Boston Massachusetts, Providence Rhode Island, Cape Cod Massachusetts, Falmouth Massachusetts, or Waquoit Massachusetts, including but not limited to, travel to or from Boston Massachusetts, Providence Rhode Island, Cape Cod Massachusetts, Falmouth Massachusetts, or Waquoit Massachusetts, or any area within 100 miles of these geographic regions which is to include, but is not limited to, Receipts for, flights, bus fares, car rentals, gas, lodging, car repairs, road service, food or any other items from these regions that reference any Receipts for expenses. Further, is to include; any minutes of meetings and/or any Companies' notes and/or records, emails, photos, letters, and/or correspondence by and between any persons who are partners, employees, agents or in any way associated with any Companies by and between, any related or non-related party to any Companies that reference directly or indirectly, any Receipts for any expenses or records originating from these geographic areas as defined in this paragraph.
6. Any and all Documents or Receipts to or from, and/or that reference directly or indirectly, the Defendant Sophie J. Torres, the grandmother of Defendant Jesse E. Torres IV, including but not limited to, any items mailed to Defendant Sophie J. Torres by any Companies and/or the Defendant Jesse E. Torres IV. Further, is to include; any Receipts for monies paid or given to, credit card payments made on her behalf, credit card applications for, credit cards issued to, credit card receipts for items received for, cash Receipts for monies transferred to, legal bills ascertained on her behalf, legal Receipts for services provided to her benefit, defense, or in protection of the Properties. Any minutes of meetings, any Companies' notes, records, emails, photos, letters, and/or correspondence by and between any parties who are partners, employees, agents or in any way associated with any Companies and any related or non-related parties to any Companies that reference directly or indirectly, the Defendant Sophie J. Torres.
7. Copies of any and all phone records, including but not limited to United States phone records, Mexico phone records or any other phone records from any country, which shall include but not be limited to, Receipts, including land, cellular, internet phone communication and satellite phone bills, or any other Document that could be reasonably construed to show incoming and/or outgoing phone call history which is to include voice calls, fax calls and/or any other calls, that include or reference communications with Defendant Sophie J. Torres. Further, to include but not be limited to, any notes, journals, reports or Documents that could be reasonably construed to be related to any of the aforementioned calls and/or communications

by and between any parties who are partners, employees, agents or in any way associated with any Companies, by and between, any related or non-related parties to any Companies that in any way directly or indirectly reference the Defendant Sophie J. Torres.

8. Any and all Documents that reference directly or indirectly, the Plaintiffs Jesse E. Torres III and/or Jennifer J. Adams, including but not limited to, any minutes of meetings and/or any Companies' notes and/or records, emails, photos, letters, and/or correspondence by and between any parties who are partners, employees, agents or in any way associated with any Companies and/or the Defendants Jesse E. Torres IV and/or Donald F. Torres. Including but not limited to, any related or non-related parties to any Companies and/or the Defendants Jesse E. Torres IV and/or Donald F. Torres that reference directly or indirectly, the Plaintiffs Jesse E. Torres III and/or Jennifer J. Adams.
9. Any and all Documents and/or Receipts and/or canceled checks from any purchase and/or lease of land, buildings and/or property rights, and/or rents, leases, or monies paid in Mexico for land, properties, rents, leases or any monies therefore, including but not limited to Baja California, North, Mexico and/or Campo San Pedro, Baja California, North, Mexico.
10. Any and all Documents and/or Receipts that reference in any way, directly or indirectly, any loans and/or financial aid, and/or financing applied for, and/or received by you, where you individually, in cooperation with your Mother, or individually by your Mother, did facilitate and/or did obtain, and/or did apply for, any college loans and/or financing and/or financial aid, to facilitate your college education or anticipated college education, which is to include but not be limited to loan Documents, Federal assistance and/or loan Documents and/or applications, loan applications, loan agreements, financial aid Documents, or any legal Documents that were signed by you, or your Mother, individually and/or together referencing your college education, and any notes created in preparation of, or in support of, any of the aforementioned. Any financial Documents concerning your college education that reference directly or indirectly any Federal Documents and/or Receipts that were signed by you and/or your Mother jointly or individually under the pains and penalties of perjury.
11. Any and all Documents and/or Receipts and/or tickets for any, trips and/or vacations and/or travel, including but not limited to trips and/or vacations and/or travel destinations, where you were accompanied by, or at these destinations at the same time as, the Defendant Donald F. Torres, including but not limited to, Vietnam and/or any other, now or former communist country and/or third world country.
12. Any and all Documents and/or Receipts for any investments and/or transfers of funds to countries outside of the United States by you or any of the Companies including any and all Documents that reference directly or indirectly the transfers, investments, research, spread sheets, financial forecasts, investment opportunities or in any way reference the movement of any funds that had a source in the United States and/or were moved, and/or were considered to be moved, to an off-shore account, including but not limited to any Documents to or from any accountants, advisers or CPA concerning the movement of monies as defined in this paragraph.
13. Any and all Documents naming or referencing you and/or any of the Companies from the State of New York, including but not limited to the Office of the Attorney General of the State of New York, which is to include but not be limited to, any indictments or other legal Documents where you or any of the Companies are named as a defendant, named party, or were referenced directly or indirectly by the State of New York, including but not limited to the Office of the Attorney General of the State of New York.

14. Copies of any and all Documents which the Defendant Jesse E. Torres IV intends to use as Exhibits in the trial of this matter.

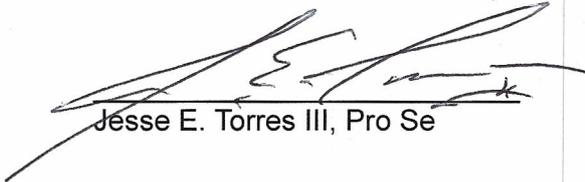


Jesse E. Torres III, Pro Se
562 Waquoit Highway
East Falmouth, MA 02536
(617) 291-0862

Dated August 23, 2011

CERTIFICATE OF SERVICE

I, Jesse E. Torres III, hereby certify that on August 23, 2011, I have served the Defendant Sophie J. Torres and Debtmerica, LLC, through counsel of record, and Jesse E. Torres IV individually at their address on file with this action, the above-captioned Notice, by postage prepaid U.S. Mail.



Jesse E. Torres III, Pro Se