

David P. Griffin	§	IN THE DISTRICT COURT
Plaintiff,	§	
	§	
vs.	§	
	§	
CITY OF AUSTIN, RONDELLA	§	
HAWKINS, individually and as an	§	126 <sup>Th</sup> JUDICIAL DISTRICT
employee of the City of Austin, PUBLIC	§	
ACCESS COMMUNITY TELEVISION aka	§	
CHANNEL AUSTIN, GARRY WILKISON	§	
and LINDA LITOWSKY, individually, and as	§	
Executives of Public Access Community	§	
Television, CATHY BEAUDOIN, JACKIE	§	
GOODMAN, CELIA HUGHES, EMANUEL,	§	
LIMEL PALOMU, DANIEL SCARDINO,	§	
DEBORAH L. HILL, TRENA DENLEY,	§	
HELENE CAUDILL, individually and as Board	§	
Members of Public Access Community	§	TRAVIS COUNTY, TEXAS
Television	§	
	§	
Defendants.	§	

**PLAINTIFF’S REQUESTS FOR ADMISSIONS, INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT RONDELLA HAWKINS**

To: Defendant RONDELLA HAWKINS (“YOU”), who is an employee of the City of Austin, 124 West 8th Street, Suite 210, Austin, Texas 78701

COMES NOW, David P. Griffin, Plaintiff in the above-styled and numbered cause, and pursuant to Texas Rules of Civil Procedure **RULE 198 REQUEST FOR ADMISSIONS, Rule 197.1. INTERROGATORIES** and **RULE 196 REQUEST FOR PRODUCTION** of the Texas Rules of Civil Procedure, requests that Defendants disclose, within 30 days of service of this request, the information or materials described in Rule 194.2 (a)-(l) and reasonably supplement the responses as specified in Rule 193.5 of the Texas Rules of Civil Procedure.

**REQUESTS FOR ADMISSION**

Pursuant to Texas Rule of Civil Procedure 198, Plaintiff requests that Defendant **RONDELLA HAWKINS** admit or deny the following:

**REQUEST FOR ADMISSION NO. 1:** Admit or deny that during your administration of the operation of Public Access Community Television (hereinafter “PACT”) that more than \$350,000.00 was embezzled by a previous contractor.

**REQUEST FOR ADMISSION NO. 2:** Admit or deny that on or about July 16, 2008, Plaintiff complained to YOU regarding the unprofessional behavior and illegal activities of Management at PACT.

**REQUEST FOR ADMISSION NO. 3:** Admit or deny that YOU had personal knowledge and that the City was aware that PACT and/or counsel for the City of Austin (hereinafter "City") or any third party on your behalf interfered with Plaintiff's internet service provider by sending correspondence to Hostia or any third parties requesting that the Plaintiff's account with Hostia be blocked from public view?

**REQUEST FOR ADMISSION NO.4:** Admit or deny that in response to Plaintiff's open records request made on or about September 24, 2008, YOU indicated that there were no plans to upgrade the wiring of the PACT building.

**REQUEST FOR ADMISSION NO. 5:** Admit or deny that YOU were aware that City Property was being sold by PACT by its management personnel, namely, Defendants GARRY WILKISON and LINDA LITOWSKY.

**REQUEST FOR ADMISSION NO. 6:** Admit or deny that ten (10) Apple Computers were purchased by the Whitlock Group, each containing a one (1) GB of memory chip.

**REQUEST FOR ADMISSION NO. 7:** If YOU admit Request for Admission No. 6, please admit or deny that said computers were then shipped to PACT and that the one (1) GB of memory was replaced with larger memory chips to enhance the computers' performance.

**REQUEST FOR ADMISSION NO. 8:** Admit or deny that YOU have personal knowledge that the City of Austin ("City") has responded to any communications from Plaintiff.

**REQUEST FOR ADMISSION NO. 9:** Admit or deny that is it the policy of the City or your department to ignore complaints made by the public.

**REQUEST FOR ADMISSION NO. 10:** Admit or deny that the City has taken any action to avoid the instant litigation.

**REQUEST FOR ADMISSION NO. 11:** Admit or deny that YOU have had special training in connection with SB5 State Law and understand the impact of this tenet as it might affect your job responsibilities.

**REQUEST FOR ADMISSION NO. 12:** Admit or deny that Marion Nickerson was the program director at PACT for over ten (10) years and was ordered to take time off from his job so that PACT management could go through his office looking for evidence sufficient to accuse him of any wrongdoing, and that such action was taken an effort to create false allegations in order to have him fired for cause.

**REQUEST FOR ADMSSIION NO. 13:** Admit or deny that the personnel replacement for the program director Marion Nickerson has the same amount of years of experience and/or knowledge level required to fulfill the job.

**REQUEST FOR ADMISSION NO. 14:** Admit or deny that YOU have personal knowledge that Defendant GARRY WILKISON was donating his personal equipment to PACT in order to have it repaired and paid for by the City.

**REQUEST FOR ADMISSION NO. 15:** Admit or deny that YOU knew that on or about July 11, 2008, Plaintiff had filed a complaint with the Austin Equal Opportunity and Fair Housing office against PACT.

**REQUEST FOR ADMISSION NO. 16:** Admit or deny that YOU are aware that the Board of Directors of PACT were notified of the unprofessional conduct of PACT management by third parties.

**REQUEST FOR ADMISSION NO. 17:** Admit or deny that YOU have personal knowledge that donations made to PACT would be considered property of PACT and could be sold or removed when the contract between PACT and the City expired.

**REQUEST FOR ADMISSION NO. 18:** Admit or deny that YOU were aware that Defendant GARRY WILKISON had instructed the Plaintiff to keep three (3) separate lists of all equipment: One for Time Warner equipment, one for the City of Austin equipment and one for PACT/Donations.

**REQUEST FOR ADMISSION NO. 19:** Admit or deny that a camera designated as a “youth camera” and its accessories worth well over \$900.00 was stolen on or about June 1, 2008 and that it took several months before management reported this theft.

**REQUEST FOR ADMISSION NO. 20:** Admit or deny that in connection with Request for Admission No. 19 herein, when the chairs were stolen from the outside designated smoking area, a police report was filed that same day.

**REQUEST FOR ADMISSION NO. 21:** Admit or deny that in connection with Request for Admission Nos. 19 and 20, herein, surveillance footage was pulled and a PSA was created looking for the identity of the individual that had stolen the chairs.

**REQUEST FOR ADMISSION NO. 22:** Admit or deny that in connection with Request for Admissions No. 19 through 21 herein, that said missing chairs were more important to management than the reported missing City equipment.

**REQUEST FOR ADMISSION NO. 23:** Admit or deny that certain citizens of Austin are being denied access to City equipment in City facilities.

**REQUEST FOR ADMISSION NO. 24:** Admit or deny that YOU had personal knowledge or became aware through your representatives, that at the request of Plaintiff, Federal District Court Judge Yakel, in Case No. A-09-CV-107-LY in the United States District Court for the Western District of Texas, Austin Division, entitled Griffin v. Public Access Community Television, aka Channel Austin, et al., on June 05, 2009 entered a final order of dismissal in both the State and Federal actions involving Plaintiff and Defendants herein.

**REQUEST FOR ADMISSION NO. 25:** Admit or deny that YOU personally, or through your representatives, received a copy of the final order of Judge Yakel referenced in Request for Admission No. 23.

**REQUEST FOR ADMISSION NO. 26:** Admit or deny that to your knowledge, Grande Communications were contractually committed to paying the City two million dollars (\$2,000,000.00) for capital expenses and that YOU failed to enforce such payment.

**REQUEST FOR ADMISSION NO. 27:** Admit or deny that to your knowledge, the City conducted an audit in connection with the franchise agreement with Time Warner and such audit revealed that Time Warner had not been honest and forthcoming in its reporting to the City.

**REQUEST FOR ADMISSION NO. 28:** Admit or deny that YOU have personal knowledge that your telephone conversations with PACT management were being recorded.

**REQUEST FOR ADMISSION NO. 29:** Admit or deny that in 2005 and 2006, PACT participated in the “First Night” activities.

**REQUEST FOR ADMISSION NO. 30:** Admit or deny that in 2007, PACT did not participate in the “First Night” activities based in part due to the large consumption of alcohol that was taking place on the Mayor’s balcony which was furnished to the Producers by the Mayor’s staff for “a family friendly non-alcoholic event.”

**REQUEST FOR ADMISSION NO. 31:** Admit or deny that the software known as Facil is used by PACT as management software, which software is used to manage dates, times, usage of equipment and inventory for PACT.

## **II. INTERROGATORIES**

Pursuant to Texas Rules of Civil Procedure, Rule 197.1, a party may propound interrogatories at any point up to thirty (30) days before the end of the discovery period.

### **INSTRUCTIONS**

A. These interrogatories are to be answered by YOU to the extent of all information which is or may be available to YOU, or to any person, employee, agent, engineer, expert, accountant, or attorney who has acted or is now acting on your behalf, and not merely information within your personal knowledge.

B. If, after a reasonable and thorough investigation using due diligence, YOU are unable to answer any interrogatory or any part thereof, on the grounds of lack of information available to you, specify in full and complete detail why the information is not available to YOU and what has been done to locate such information. In addition, specify what knowledge or belief YOU do have concerning the unanswered portion of any interrogatory and set forth the facts upon which such knowledge or belief is based. If, in answering any interrogatories concerning or calling for information about other parties, YOU are unable to answer with respect to all or every party, set forth the required information about which YOU have any knowledge.

C. Where an interrogatory does not specifically request a particular fact, but where such fact or facts are necessary to make the answer to said interrogatory either comprehensible, complete or not misleading, YOU should include such fact or facts as part of said answer and said interrogatory shall be deemed specifically to request such fact or facts.

D. These interrogatories are to be regarded as continuing, and YOU are requested to provide, by way of supplementary answers thereto, such additional information as YOU may hereafter obtain which will augment or otherwise modify your answers now given to the interrogatories below as

soon as YOU become aware of same or know or have reason to know that any such answer was incorrect when made or that an answer, though correct when made, is no longer completely true, or requires augmentation or modification.

E. "Person" is defined to include a natural person, partnership, joint venture, corporation, association, trust or any other kind of entity.

F. "Representative" is defined to include a person, agent, employee, officer, attorney, accountant, consultant, servant, and all other capacities where one may perform services for or act on behalf of, or for the benefit of, another either directly or indirectly.

G. "Tangible Things" as used herein is defined as documents, records, books, papers, contracts, memoranda, invoices, correspondence, notes, photographs, drawings, recording tapes, recording discs, or any other mechanical or electronic information storage or recording elements and all other things, which are tangible. If a tangible thing has been prepared in several copies or additional copies have been made that are not identical (or are no longer identical by reason of subsequent notation or other modification of any kind whatever, including, without limitation, notes or modifications on the backs of pages thereof, or on copies thereof), each non-identical copy is a separate "tangible thing."

H. "Evidence" or "evidencing" as used herein is defined as including, referring, or relating in any way to, being evidence of, or memorializing, all or any portion of facts or contentions specified in these interrogatories.

I. Where an interrogatory asks that YOU describe tangible things, it shall be deemed a sufficient answer wherever appropriate and possible to furnish true and legible copies thereof, together with your answers to these interrogatories.

J. Where an interrogatory asks that YOU describe all tangible things, then YOU should state with particularity the date, author, description, addressee, nature, custody, condition and location of any and all tangible things which evidence all or any part of the contentions or facts specified in the interrogatories.

K. Where an interrogatory asks that YOU describe all oral communications, then YOU should state whether any oral communication evidences all or any portion of the contentions or facts specified in these interrogatories, and if so, with respect to each such oral communication, the date and place thereof, whether said communication was in person or by telephone, the name, employer, title, occupation, present or last known home and business address and telephone number of each person who participated in or heard any part of said communication, and the substance of what was said by each person who participated in said communication.

L. Where an interrogatory asks YOU to describe all witnesses or to describe a person, state the name, employer, title, occupation, present or last known home and business address and telephone number of each and every person (other than expert witnesses) whose identity is sought by, or who has or may have knowledge of any of the events, things, or facts specified in these interrogatories.

M. Where an interrogatory asks YOU to describe all expert witnesses, state the name, employer, title, occupation, present or last known home and business address and telephone number of each and every expert witness whom YOU intend or expect to call to testify as to any of the contentions or facts specified in these interrogatories; and for, each such expert witness, state his or her qualifications and the subject matter on which the expert is expected to testify, the substance of the facts and opinions concerning which he or she is expected to testify and the grounds for each opinion.

N. If YOU claim any form of privilege, whether based on a statute or otherwise, as a ground for

not answering an interrogatory or any portion thereof, or for not voluntarily producing any tangible thing, set forth in your answers with respect to each such oral conversation or tangible thing for which YOU claim such a privilege the following:

- (a) The date thereof;
- (b) The name, address, title and occupation of each of the participants in the oral conversation or each of the authors and addresses of each tangible thing;
- (c) The name, title, and address of the present custodian of each tangible thing;
- (d) A description of each such oral conversation or tangible thing (by subject matter or title) which is sufficient to identify the particular conversation or tangible thing without revealing the information for which a privilege is claimed; and
- (e) Each and every fact or basis on which YOU claim any such privilege.

O. For the purposes of these interrogatories, wherever necessary to ensure completeness or accuracy, words importing them singular number include, the plural and words importing the plural number include the singular, and words importing the masculine include the feminine.

P. "YOU" as used in these interrogatories means Defendant RONDELLA HAWKINS, including all of your present and former attorneys, agents, servants, representatives, employees, and consultants, both present and past.

**INTERROGATORY NO. 1:** If YOU admit Request for Admission No. 1, please state the following:

- a. What action, if any, did YOU take once the crime was discovered?
- b. What action, if any, did the City take once the crime was discovered?
- c. What action, if any, was taken with regards to your negligence?
- d. What action, if any, did the City take to recover these funds?

**INTERROGATORY NO. 2:** If YOU admit Request for Admission No. 2, please state the following:

- a. What action, if any did, YOU take once YOU received this information?
- b. What action, if any, did the City take?

**INTERROGATORY NO. 3:** If YOU admit Request for Admission No. 3, please state the following:

- a. Was this open records request fulfilled to the full specifications under the law?
- b. Was there a line item budgeted in the documents furnished to Plaintiff from that open records request indicating a line item of a little over the \$150,000.00 budgeted for wiring the PACT building?

**INTERROGATORY NO. 4:** If YOU admit Request for Admission No. 3, please state your personal knowledge regarding the circumstances surrounding this event.

**INTERROGATORY NO. 5:** To your knowledge, did Plaintiff on or about September 24, 2008, make open records request? If so, please state:

- a. Did YOU respond to this open records request?
- b. What was your response to this open records request?

**INTERROGATORY NO. 6:** Are YOU familiar with a PACT Producer named Mary Alshire? If so, please state:

- a. Did YOU receive complaints regarding Mrs. Alshire's conduct and treatment of staff at PACT? If so, please explain.
- b. Do YOU know of any employees who resigned their position at PACT as a direct result from confrontations between staff and Mrs. Alshire?

**INTERROGATORY NO. 7:** Did YOU at anytime investigate the complaints that Plaintiff made on or about July 16, 2008? If so, please state in detail what actions were taken.

**INTERROGATORY NO. 8:** On or about October 9, 2008, did YOU receive any form of communication from Plaintiff, either oral or written, complaining of illegal activity and unprofessional behavior of Defendants herein? If so, please state:

- a. In detail the form of communication and its contents;
- b. What actions were taken, if any, in response to said complaint.

**INTERROGATORY NO. 9:** To your knowledge, did the Whitlock Group supply ten (10) computers with approximately one (1) GB of memory for the benefit of the City and PACT, which were subsequently replaced with larger memory chips? If so, please state:

- a. What happened to the original memory chips?
- b. Were all ten (10) computers shipped to PACT?
- c. To your knowledge, were larger memory chips purchased, replacing the 1GB chips that were originally installed in these computers?
- d. Please explain the standard procedure of disposing of equipment such as that described herein and exactly what procedure was followed in the instant case.

**INTERROGATORY NO. 10:** Please explain the reason behind supplying alcohol to PACT producers on the 2006 First Night Event, which was marketed as a "family non-alcoholic event."

**INTERROGATORY NO. 11:** Please explain why the Whitlck group was contracted to purchase and install a playback system on a contract that had already been completed despite the fact that

the Whitlock Group was known to do substandard work and cost substantially more than competitors and substantially more time spent on the original installation than was originally budgeted.

**INTERROGATORY NO. 12:** If YOU were aware that Plaintiff submitted complaints regarding PACT, what actions, if any, did YOU take?

**INTERROGATORY NO. 13:** Please explain what action, if any, has the City taken to avoid this litigation.

**INTERROGATORY NO. 14:** Please explain any training YOU received in connection with the passage of Senate Bill 5 (SB5).

**INTERROGATORY NO. 15:** Please state the circumstances surrounding the departure of Marion Nickerson from PACT.

**INTERROGATORY NO. 16:** Please state the name of the individual or individuals who replaced Marion Nickerson in the position he vacated as well as the experience level of the replacement in comparison to that of Marion Nickerson.

**INTERROGATORY NO. 17:** What is the main concern given by citizens who have complained to YOU about their rights violations at PACT?

a. To your knowledge, did the EEOC address these complaints with PACT management. If so, please advise as to the actions taken.

**INTERROGATORY NO. 18:** Please explain the function of the Board of PACT and their involvement in connection with the everyday operations of PACT.

**INTERROGATORY NO. 19:** Please state the City's policy regarding donations and the criteria necessary for the recipient to receive those donations.

**INTERROGATORY NO. 20:** Please explain the theft of the "youth camera" and the response time for reporting this theft as opposed to the response time of Management to act upon the theft of chairs.

**INTERROGATORY NO. 21:** Please explain why PACT producers Gloria Morales and Sue Cole have been and currently are being denied access to services provided by PACT.

**INTERROGATORY NO. 22:** To your knowledge, has there been any communication between the City and any of the named Defendants regarding this or any previous litigation?

**INTERROGATORY NO. 23:** What is the method of communication between the City and PACT regarding pending litigation against PACT?

**INTERROGATORY NO. 24:** Please list in detail what was revealed by the audit of time Warner in connection with its contract with the City of Austin as it related to PACT.

a. Was the thirty-five cent (\$0.35) access fee set aside for PACT as per the contract, and then paid to PACT? If not, why not?

b. If so, what violations were discovered in regard to those audits.

**INTERROGATORY NO. 25:** If you admit Request for Admission No. 27, has the City tried to recover any of the lost funds?

### **III RULE 196 REQUEST FOR PRODUCTION**

Pursuant to Texas Rule of Civil Procedure 196, plaintiff requests that, within thirty days (30) of the service of this document, defendant produce to plaintiff for inspection and copying all records and documents, papers, books, letters, memos, objects and tangible things described below at plaintiff's residence located at \_\_\_\_\_, on \_\_\_\_\_, 2009 at the hour of \_\_\_\_\_. The copying will be done by plaintiff at a public copy center. In lieu of production, defendant may mail, on or before \_\_\_\_\_, 2009, legible copies of the requested documents. Production of copies in this manner will not constitute a waiver of Plaintiff's right to examine the originals.

#### **I. DEFINITIONS**

A. The words: "and," "or," "each," "every," "any," "all," "refer," "discuss" shall be construed in their broadest form and the singular shall include the plural and the plural shall include the singular whenever necessary so as to bring within the scope of these Requests all Documents (defined below) that might otherwise be construed to be outside their scope.

B. "Defendant," includes the entity responding to these requests and any related entity (whether by common ownership, operation, or control).

C. "Document" means those documents as identified and/or defined and required to be produced in accordance with Rule 196 of the Texas Rule of Civil Procedure. All non-identical copies, including drafts, of the same Document are Documents within the meaning of that term and must be produced as well.

D. "Include" or "including" means including, but not limited to.

E. "Person" or "Individual" means natural persons, sole proprietorships, corporations, firms, partnerships, unincorporated associations, trusts and any other legal entity.

## II. GENERAL PROCEDURES

A. Produce all Documents described below, including Documents that are in the possession, custody or control of the Defendants, its directors, consultants, contractors, insurance companies, officers, employees, attorneys, accountants, or agents, or other Persons that are otherwise subject to your custody or control. All Documents that respond, in whole or in part, to any portion of these Requests must be produced in their entirety, including all attachments and enclosures.

B. If YOU contend that any Document responsive to these Requests is privileged or otherwise protected from production, in whole or in part, or if YOU otherwise object to any of these Requests, YOU are required by Local Court Rules of the United States District Court for the Eastern District of Texas and the Civil Justice Expense and Delay Reduction Plan for the Eastern District of Texas, Article Two (1)(a)(v), to provide a privilege log. The privilege log is required to (1) identify the documents or information claimed to be privileged, (2) detail the basis for the privilege in a manner that will enable other parties to assess the applicability of the asserted privilege or protection. This log should include author, date, intended and other recipients, the subject matter and detailed information so that Plaintiff may determine whether the privilege is applicable.

C. For purposes of these requests, the words utilized are considered to have, and should be understood to have, their ordinary, every day meaning. Plaintiff refers Defendants to any collegiate dictionary such as Webster's New World Dictionary, Second College Edition by Prentice Hall Press, in the event Defendants assert that the wording of a request is vague, ambiguous, unintelligible, confusing.

## REQUESTS FOR PRODUCTION

**REQUEST FOR PRODUCTION NO. 1:** All documents which set forth any open record requests made and submitted by Plaintiff as well as a copy of any responses made by YOU or the City in regard to those requests.

**REQUEST FOR PRODUCTION NO. 2:** All documents which evidencing the embezzlement of the \$350,000.00 by the previous contactor for PACT including reports of theft, and actions taken.

**REQUEST FOR PRODUCTION NO. 3:** All documents and records relating to complaints made by Plaintiff and directed to YOU and the City of Austin regarding any of the Defendants herein.

**REQUEST FOR PRODUCTION NO. 4:** All documents (including, but not limited to emails, memos, letters etc) which pertain to the blocking of the Plaintiff's website pages, whether initiated by YOU or third parties.

**REQUEST FOR PRODUCTION NO. 5:** All documents pertaining to upgrading the wiring at the PACT facilities.

**REQUEST FOR PRODUCTION NO. 6:** All documents including but limited to emails, letters, reports, memos which pertain to the purchase and shipment by Whitlock Groups of ten (10) Apple Computers, including but not limited to the receipts and all documents pertaining to the equipment and as well as a copy of the policy to be followed in disposing of said chips.

**REQUEST FOR PRODUCTION NO. 7:** All documents which set forth any formal complaints filed by Plaintiff against PACT and/or the City of Austin.

**REQUEST FOR PRODUCTION NO. 8:** All documents which set forth receipts and/or documents pertaining to any training YOU have taken to enhance your job skills between January 1, 2006, through the present date.

**REQUEST FOR PRODUCTION NO. 9:** All documents that pertain to the employment and termination of Marion Nickerson in connection with his employment at PACT including, but not limited to:

- a. Marion Nickerson's resume;
- c. The resume of the personnel that eventually replaced Marion Nickerson;
- d. Any communications (either written or oral) between YOU and PACT regarding the termination and replacement of Mr. Nickerson;
- e. Any communications (either written or oral) between YOU and PACT regarding the hiring of Mr. Nickerson's replacement.

**REQUEST FOR PRODUCTION NO. 11:** All documents which set forth donations given by Defendant GARRY WILKINSON to PACT of his personal equipment which is owned by his own company, PACT, and any repair receipts made on said equipment once donated.

**REQUEST FOR PRODUCTION NO. 12:** In connection with the donation of Defendant GARRY WILKINSON as set forth in Request for Production No. 11, all documents indicating the whereabouts of the donated equipment at this time.

**REQUEST FOR PRODUCTION NO. 13:** All documents which set forth Plaintiff's complaints filed with the EEOC, and any communications regarding the same between YOU and third parties or their representatives.

**REQUEST FOR PRODUCTION NO. 14:** All documents (including but not limited to memos, letters, emails and/or recorded tapes) received by YOU, which set forth Plaintiff's complaints with PACT management and its operations.

**REQUEST FOR PRODUCTION NO. 15:** All documents, communications whether oral or written pertaining to the policy for donated equipment to the City and ultimately where and to whom those donations are to benefit.

**REQUEST FOR PRODUCTION NO. 16:** All documents (including, but not limited to emails, memos, letters) pertaining to the theft of the "Youth Camera" and its accessories.

**REQUEST FOR PRODUCTION NO. 17:** All documents pertaining to the theft of the chairs designated as "smokers' chairs" located in the front of PACT's facilities.

**REQUEST FOR PRODUCTION NO. 18:** Please supply a list of all producers who have been denied access to PACT facilities, the reasons why they have been denied access and copies of any and all communications regarding the decision to deny access and/or the results of denying access to these producers.

**REQUEST FOR PRODUCTION NO. 19:** Please supply a copy of Judge Yakel's final orders issued to YOU and/or your representatives in connection with the federal lawsuit in Case No. A-09-CV-107-LY in the United States District Court for the Western District of Texas, Austin Division, entitled Griffin v. Public Access Community Television, aka Channel Austin, et al., on June 05, 2009.

**REQUESTION FOR PRODUCTION NO. 20:** All documents which set forth all communications between you, the City of Austin and Grande Communications regarding the \$2,000,000.00 for capital expenses as it relates to PACT's operations.

**REQUEST FOR PRODUCTION NO. 21:** All documents which set forth all audits of Time Warner in connection with its contract with the City of Austin regarding PACT as well as all communications regarding the audit referenced in Request for Admission No. 27.

**REQUEST FOR PRODUCTION NO. 22:** In connection with the audit referenced in Request for Admission No. 27, please supply copies of all reports as well as any communications pertaining to recovery of said funds.

**REQUEST FOR PRODUCTION NO. 23:** Please supply any recordings of phone conversations or meetings had between YOU and any third parties pertaining to the complaints lodged by Plaintiff herein.

**REQUEST FOR PRODUCTION NO. 24:** All documents which set forth any communications whether oral or written regarding PACT producers not being included in the annual "First Night" activities.

DATED this \_\_\_\_ day of November, 2009.

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David P. Griffin, Plaintiff Pro Se  
ADDRESS

CERTIFICATE OF MAILING