

## **ATTACHMENT "A"**

### **AFFIDAVIT IN SUPPORT OF SUBPOENA DUCES TECUM**

#### **DEFINITIONS**

1. "YOU" and "YOUR" means ABC, Inc., ("ABC") its employees, agents, attorneys, accountants, consultants, investigators and all other persons acting on its behalf, including but not limited to, officers, directors.

2. "DOCUMENT" and "DOCUMENTS" means any "writing" as defined in Evidence Code section 250 in YOUR possession, custody or control including but not limited to notes, correspondence, reports, affidavits, memoranda, contracts, leases, invoices agreements, minutes, diaries, notebooks, notations in appointment books or diaries, bulletins, circulars, forms, statements, journals, letters, telegrams, notices, interoffice and intra office communications, recordings of meeting or telephone conversations, electronic mail, photocopies, studies, analyses, messages, comparisons, graphs, charts, compilations, drawings, receipts, schedules, summaries, films, photographs, tapes, mechanical or electrical sound recordings or transcripts thereof; electronic data, computer data bases, computer codes, computer printouts, software, books, pamphlets, periodicals, reports, notations, messages, cables, videotapes, magazines, booklets, instructions, purchase orders, bills, checks, charge slips, tabulations, questionnaires, surveys, sketches, blueprints, working papers, indexes, records of purchase of sale, contracts, agreements, leases invoices, expense records, trip reports, press releases, appraisals, valuations, estimates, opinions, financial statements, accounting records, income statements (including consolidated income statements), electronic or other transcriptions or taping of telephone or personal conversations, conferences or meetings, telephone logs, appointment calendars, calendars, group scheduler calendars, paintings, minutes, financial reports, accounting reports, facsimiles, facsimiles transmission reports, or logs, teletype messages, directories, computer directories, computer disks, computer tapes, computer media including storage devices, hard drives, or any other written, printed, typed, punched, taped, filmed or other electronic media or retrievable data

and all other papers and graphic matters similar to the foregoing, regardless of their author or origin and however denominated, including all copies of DOCUMENTS on which there appear any markings that do not appear on the originals thereof.

3. The term “COMMUNICATIONS” means all information bestowed, imparted, made known, counted, transmitted or otherwise conveyed by means of writing, typewriting, printing, electronic or mechanical symbols, spoken words or gestures, distributed or published by YOU, including COMMUNICATIONS received by YOU from any other person or source.

#### DOCUMENTS TO BE PRODUCED

1. ALL DOCUMENTS, including “W-2” and “1099” forms, as described by the Court’s January 28, 2008 Order, which reflect monetary income received by John Doe from ABC from January 1, 2005 to the present.

2. ALL DOCUMENTS which reflect non-monetary income received by John Doe from ABC from January 1, 2005 to the present.

3. ALL DOCUMENTS which reflect salaries paid by ABC to any officer of the company from January 1, 2005 to the present.

4. ALL DOCUMENTS which reflect any ownership interest of John Doe in ABC including stock certificates issued by ABC to John Doe.

5. ALL DOCUMENTS including annual profit and loss statements that reflect the profitability of ABC from January 1, 2005 to the present.