

## **DOCUMENTS REQUESTED FOR PRODUCTION**

- 01) all Documents referencing, relating to or evidencing any right to payment to Zurich from any of the Debtors or any debt owed by Zurich to any of the Debtors including, without limitation, insurance policies, contracts, invoices, accountings, checks, letters, correspondence, e-mails, agreements, notes, receipts, bills, account statements, tax papers, work papers, files, itemizations, claim analyses, security agreements, letters of credit, claim forms or submissions, internal memoranda, reports or other evidence of indebtedness;
- 02) all Documents referencing, relating to or evidencing any open claim file under the Policies;
- 03) all Documents referencing, relating to or evidencing any pricing policy that is or was at any time applicable to the Policies.
- 04) all Documents referencing, relating to or evidencing any pricing schedules for the Policies.
- 05) all Documents referencing, relating to or evidencing any rate classifications that are now or were at any time applicable to the Policies.
- 06) all Documents referencing, relating to or evidencing any practice or procedure for handling of claims under the Policies.
- 07) all Documents referencing, relating to or evidencing any audit of any of the Debtors performed by Zurich.
- 08) all Documents referencing or relating to all retrospective adjustments of any premium or deductible due under the Policies.
- 09) all Documents relating to the facts and circumstances recited in the Administrative Claim Motion.
- 10) all Documents showing the number of Covered Employees and referencing, relating to or identifying any Covered Employees.
- 11) all Documents showing the amounts due to Covered Employees from the Debtors' respective bankruptcy estates for services performed within 90 days before the Debtors' respective Petition Dates.
- 12) all Documents showing the amounts paid to Covered Employees by the Debtors' respective bankruptcy estates for services performed within 90 days before the Debtors' respective Petition Dates.

- 13) all Documents showing the aggregate amount paid by any of the Debtors' respective bankruptcy estates on behalf of Covered Employees to any employee benefit plan.
- 14) all Microsoft Excel files (produced in Microsoft Excel file format) showing calculations of current loss runs for the Policies.
- 15) all Microsoft Excel files (produced in Microsoft Excel file format) showing calculations of Born-Ferguson factors for the Policies.
- 16) all field notes on all Open Claims and all Closed Claims.
- 17) access to Zurich's Risk Manager online tool
- 18) all Documents referencing, relating to or evidencing any information provided by any of the Debtors to Zurich in connection with the audit adjustment for 2003-2004 under the Policies.
- 19) all Documents showing Zurich's calculation of the audit adjustment of premiums for 2003-2004 under the Policies.
- 20) all Documents supporting Allocated Loss Adjustment Expense charges under the Policies.
- 21) all Documents referencing, relating to or evidencing any surety bond issued from any of the Debtors to Zurich as collateral for the Policies that were in effect during 2001 and 2002.
- 22) all Documents referencing, relating to or evidencing any calculation under the Born-Ferguson methodology in conjunction with the Policies.
- 23) all Documentation referencing, relating to or evidencing any data used in the LDF method and the Born-Ferguson method that are not specifically tied to published company loss runs or a specific contract with any of the Debtors.
- 24) copies of all Microsoft Excel files (in Microsoft Excel file format) with formulas and supporting schedules used to calculate the Born-Ferguson method of claims reserves.
- 25) all documents related to any current loss runs for the Policies.
- 26) all correspondence between Zurich or its counsel and any of the Debtors, the Trustee, or their respective counsel.

27) all of the Policies.