

IN THE SUPREME COURT OF NOVA SCOTIA
BETWEEN:

Trout Point Lodge, Limited, *a Nova Scotia Limited
Company*, **Charles L. Leary**,
Vaughn J. Perret, *in their official
capacities*

Plaintiff

- and -

Louisiana Media Company, LLC, *a Delaware Limited
Liability Company*

Defendant

Demand for production of undisclosed copy

TAKE NOTICE that as per Civil Procedure Rule 14.09 (1) the Plaintiff Trout Point Lodge, Ltd. hereby demands that the Plaintiff deliver a copy of the documents and/or electronic information indicated below:

- All news broadcasts, whether by Internet or television, by WVUE/Louisiana Media made on January 7, 2010.
- All internal records, notes, e-mails, or any other documentation of the "Fox News 8 Investigates" investigation into Aaron Broussard's Nova Scotia rental properties, including but not limited to documents and/or electronic information authored by Lee Zurick or Val Bracy.
- Correspondence, notes, e-mails or any other documentation related to communications between the Metropolitan Crime Commission and/or Raphael Goyeneche and Louisiana Media, WVUE, or its employees.
- Records, notes, e-mails, or any other documentation related to Patterson Edward's October 29, 2009 Racketeer Influenced and Corrupt Organizations Act lawsuit filed in United States District Court in the possession of Louisiana Media and/or its employees.
- Records of all attempts to contact Trout Point Lodge between January 1 and January 9, 2010.

Within fifteen (15) days of Wednesday, September 1, 2010 you must:

(a) accept the demand, and deliver a copy of the document or electronic information;

(b) refuse the demand on the ground that the document or electronic information is privileged, irrelevant, or not in the control of the party;

(c) make a motion to the Court to limit your obligation to produce the document or electronic information, and seek to rebut the presumption in favour of disclosure by establishing that compliance

with the demand is disproportionate under Rule 14.08.

Should you fail to respond to this demand, a judge may order you to indemnify the Defendants for the expenses of obtaining an order for production.

Dated at East Kemptville, Nova Scotia, this 1st day of September, 2010.



Dr. Charles L. Leary
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The Prothonotary
The Law Courts, Kentville, NS