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September 23, 2010

VIA COURIER AND EMAIL

Charles L. Leary
Trout Point Lodge Limited
189 Trout Point Road
PO Box 456
Kemptville NS B0W 1Y0

Dear Mr. Leary:

Re: **Trout Point Lodge, Limited et al v. Louisiana Media Company, LLC – Yar No. 328428**

I write further to the Plaintiffs' demand for undisclosed copy, made pursuant to Civil Procedure Rule 14.09. Below are the Defendant's responses:

1. **All news broadcasts, whether by internet or television, by WVUE/Louisiana Media made on January 7, 2010.**

Enclosed is one CD ROM, containing Fox 8 news broadcasts on January 7, 2010 at 6am and 8am and one CD ROM, containing Fox 8 news broadcasts on January 7, 2010 at 5:30pm and 9pm.

All other news broadcasts by WVUE/Louisiana Media on January 7, 2010 are not relevant to this action.

2. **All internal records, notes, emails, or any other documentation of the "Fox New 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.**

The following documents are enclosed:

- Tab 1 Map from Service Nova Scotia and Municipal Relations of various properties located on Trout Point Road;
- Tab 2 Indenture between Trout Point Lodge Limited (Grantor) and Aaron F. Broussard and Karen A. Parker (Grantees), dated June 9, 1999;
- Tab 3 Collateral Mortgage between Aaron F. Broussard and Karen Parker (Mortgagor) and First Bank Trust (Mortgagee) and Aaron F. Broussard and Karen A. Parker (Guarantors), dated November 15, 2000;

- Tab 4 Indenture between Trout Point Lodge Limited (Grantor) and Roy M. D'Aquila, Aaron F. Broussard, Lawrence W. Stoulig Jr., James E. Smith Jr. and Kempt Wilderness Lodge Services (Grantees), dated April 12, 2004;
- Tab 5 Collateral Mortgage between Roy M. D'Aquila, Aaron F. Broussard, Lawrence W. Stoulig Jr., James E. Smith Jr. and Kempt Wilderness Lodge Services (Mortgagor) and Omni Bank (Mortgagee), dated September 5, 2004;
- Tab 6 Personal Financial Disclosure "Tier 2", LSA-R.S. 42:1124.2 for Aaron Francis Broussard, dated May 5, 2009.

There are no other relevant documents to disclose further to this request.

3. **Correspondence, notes, emails or any other documentation related to communications between the Metropolitan Crime Commission and/or Raphael Goyeneche and Louisiana Media, WVUE, or its employees.**

The Defendant continues to look for any relevant correspondence, notes, emails or documentation in the possession or control of the Defendant further to this request, and will provide any and all relevant material if and when it is located.

4. **Records, notes, emails, or any other documentation related to Patterson Edward's October 29, 2009 Racketeer Influenced and Corruption Organizations Act lawsuit filed in United States District Court in the possession of Louisiana Media and/or its employees.**

The information requested is not relevant to this action.

5. **Records of all attempts to contact Trout Point Lodge between January 1 and January 9, 2009.**

All records of contact between Trout Point Lodge and WVUE/Fox 8 have been disclosed in the Affidavit of Documents and Affidavit of Electronic Information from the Defendant sworn on August 24, 2010.

Yours truly,


Karen N. Bennett-Clayton

KBC/pc
cc. Clients