

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DISTRICT

MAGNOLIA GROUP, LLC

PLAINTIFF

VS.

CIVIL ACTION NO.: 1:13-cv-317-LG-RHW

O'DWYER REALTY, LLC,
MARY BUNCH, ET AL

DEFENDANTS

NOTICE OF 30(b)(6) DEPOSITION OF MAGNOLIA GROUP, LLC

NOTICE IS HEREBY GIVEN, that undersigned counsel for the Defendant, Mary Bunch, will take the 30(b)(6) deposition of **Magnolia Group, LLC** through its designated representative on Wednesday, April 23, 2014, beginning at 11:00 a.m., at Deutsch, Kerrigan & Stiles, L.L.P., 2510 14th Street, Suite 1001, Gulfport, MS 39501. The deposition will be taken upon oral examination, to be transcribed stenographically, pursuant to the Federal Rules of Civil Procedure, for all purposes therein set forth before a court reporter or other officer duly authorized by law to administer oath.

The deponent shall provide at the deposition all documents referred to on Exhibit "A" hereto, pursuant to the Federal Rules of Civil Procedure, Rule 30(b)(6) and 30(b)(2). You are invited to attend and take part in such matter as may be fit and proper. Said representative should have knowledge and information regarding the items stated on Exhibit "A" hereto and shall be able to testify to matters known.

In connection with this deposition, the Plaintiffs are requesting, pursuant to Federal Rules of Civil Procedure, Rule 30(b)(6) and 30(b)(2), that documents and things

responsive to the following requests, which have not previously been produced, be produced to Defendants at time of said deposition.

The deposition shall continue from day to day until completed, and will be transcribed stenographically, for all purposes therein set forth, before a court reporter or other officer duly authorized by law to administer oaths.

RESPECTFULLY SUBMITTED this the 6th day of February, 2014.

MARY BUNCH

BY: /s/ Jason B. Purvis
JASON B. PURVIS

CERTIFICATE OF SERVICE

I, JASON B. PURVIS, hereby certify that on this day I electronically filed the above and foregoing pleading using CM/ECF which sent notification to all counsel of record.

This, the 6th day of February, 2014.

/s/ Jason B. Purvis
JASON B. PURVIS

Jason B. Purvis (MS No #100873)
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EXHIBIT "A"

1. Any and all documents related to any loans and/or financing which inured to the benefit of Magnolia Group for the purchase of real estate;
2. A copy of all communications between Magnolia Group, and its members, with Wells Fargo from the date of purchase of the subject property to present;
3. A copy of all operating agreements of Magnolia Group from 2007 to present;
4. A copy of all communications and records of communications between William Washburn and Keith Aschliman related in any way to real estate investment activities of themselves, individually, through other groups, and through the Magnolia Group.
5. Copy of all records of communications and communications among Douglas Handshoe and Magnolia Group, Keith Aschliman or William Washburn.
6. Copy of all records of communications and communications among Slabbed.org and Magnolia Group, Keith Aschliman or William Washburn.
7. Copy of all records of communications and communications among Avra O'Dwyer and Magnolia Group, Keith Aschliman or William Washburn.
8. Copy of all records of communications and communications among Rebecca O'Dwyer and Magnolia Group, Keith Aschliman or William Washburn.
9. Copy of all records of communications and communications among City of Bay St. Louis and Magnolia Group, Keith Aschliman or William Washburn.
10. Copy of all records of communications and communications among Bay-Waveland School District and Magnolia Group, Keith Aschliman or William Washburn.
11. All insurance documents related in any way to the Bay Tech Building from 2007 to present;
12. Copies of all agreements with all realtors from 2007 to present;
13. List of all monies owed to realtors for commissions;
14. List of all monies owed to any party related to real estate investment transactions;
15. Copy of all applications for financing from 2007 to present;
16. Copy of all applications for grants from 2007 to present;

17. Copy of all plans for development, including architectural and engineering drawings;
18. Copy of all applications to any municipality regarding the development and/or improvement of any investment property owned by Magnolia Group