

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

MARILYN PATRIOT)	
)	
)	
Plaintiff,)	
)	
v.)	CIVIL CASE NO: 1:07-cv-01xxx-XXX
)	
UNITED STATES, et al.)	
)	
Defendant.)	

**PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF
DOCUMENTS AND INTERROGATORIES**

A. Request for Production of Documents

Requestor, pursuant to Rule 34 FRCP, request that you allow the inspection and copying of the following documents and other items at your office, on the thirtieth (30th) day after service of this upon you:

1. Each and every document, record and material you have or can obtain about requestor.
2. Each and every document, record and material you have or can obtain about this action or pertaining to it.
3. Each and every document, record and material about or pertaining to this requestor and this action held of obtainable by you, your attorney, or agent.
4. The documents of yours and your attorney are pertaining to the witnesses in this case or potential witnesses.
5. This request is continuing in nature and applies to documents as describes above that hereafter are obtained by you.

B. Interrogatories

Pursuant to Rule 33, FRCP, Requestor requests that you answer the following Interrogatories within 30 days, separately, fully, in writing and under oath. As used herein, the term "identify" with reference to an individual means to furnish his name, job title, business address, present job description and relation to this action. With reference to a document, the term "identify" means state its nature, its date, its author and addressee, its description, its present location and custodian.

1. Identify all documents, records, tapes, etc. related in any way to this case.
2. Identify all persons, parties, witnesses, and potential witnesses, involved any way in this case.
3. Identify all persons who assisted in responding to this discovery motion.

CERTIFICATE OF SERVICE

This is to certify that a copy of the foregoing paper was served on counsel for Defendant

Ari D. Kunofsky, Esq.
Trial Attorney, Tax Division
U.S. Department of Justice
Judiciary Center Building - Suite 6112
555 4th Street N.W.
Washington, D.C. 20001

via e-mail on Friday, December 28, 2007 by Plaintiff's Attorney.

Respectfully submitted,

/s/ Attorney Elias
Attorney Elias
Arlington, VA 22209

Date: December 28, 2007