

IN THE SUPERIOR COURT OF FORSYTH COUNTY

STATE OF GEORGIA

HIGH GABLES HOMEOWNERS
ASSOCIATION, INC.,

Plaintiff,

v.

LARRY C. OLDHAM,

Defendant.

CIVIL ACTION

FILE NO. 05 CV 2005

REQUEST FOR PRODUCTION OF DOCUMENTS TO NON-PARTY

TO: Hill Concrete Foundations & Wall
Attn: Owner/Manager
3309 Dawson Forest Rd E
Dawsonville, GA 30534-6729

Property Owner: Larry Oldham

Property location: 4250 High Gables East
Cumming, GA 30041

COME NOW High Gables Homeowners Association, Inc., *Plaintiff/Defendant* in Counterclaim, in the above-captioned case, serves upon Hill Concrete Foundations & Wall, this Request for Production of Documents pursuant to O.C.G.A. §9-11-34(c).

You are requested under Georgia law to respond to this request pursuant to the above-referenced Code section. You are requested to produce the documents requested herein within thirty (30) days of your receipt hereof by either (1) producing said originals, in person, at the offices of Attorney, Peter R. York, located at HAWKINS & PARNELL, LLP, 4000 SunTrust Plaza, 303 Peachtree Street, N.E., Atlanta, Georgia 30308-3243 or (2) by mailing said documents to Defendants, counsel at the address shown above. Please do not produce the records sooner

than ten (10) days from the date of mailing of this request in order to afford any party, or yourself, the opportunity to object to this request if desired. If no objection is filed within that period of time, the above-referenced statute directs you to promptly comply with this request with the Affidavit attached hereto.

The requested documents are as follows:

1.

Any and all correspondence, bids, contracts, construction related documents, any/all documents regarding the work performed at **4250 High Gables East, Cumming, GA 30041.**

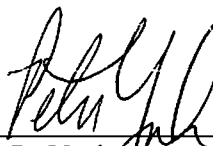
2.

Any and all documents evidencing any relationship contractually or otherwise regarding the property located at **4250 High Gables East, Cumming, GA 30041** and/or it's owner **Larry Oldham.**

This 18 day of Jan., 2006.

HAWKINS & PARNELL

4000 SunTrust Plaza
303 Peachtree Street, N.E.
Atlanta, Georgia 30308-3243
(404) 614-7400



Peter R. York
Georgia Bar No. 781175
ATTORNEY FOR DEFENDANT IN
COUNTERCLAIM HIGH GABLES
HOMEOWNERS ASSOCIATION

IN THE SUPERIOR COURT OF FORSYTH COUNTY

STATE OF GEORGIA

HIGH GABLES HOMEOWNERS
ASSOCIATION, INC.,

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CERTIFICATE OF SERVICE

This is to certify that I have this date caused to be served upon all counsel a true and correct copy of the foregoing **DEFENDANTS REQUEST FOR PRODUCTION OF DOCUMENTS TO A NON-PARTY (Hill Concrete Foundations & Wall)** by depositing same in the United States Mail in an envelope with sufficient postage affixed thereto to insure delivery and addressed to:

Larry C. Oldham, P.C.
416 Pirkle Ferry Road
Suite K-500
Cumming, GA 30040

Paul Jay Pontrelli, Esq.
Stites & Harbison, PLLC
303 Peachtree Street, N.E.
2800 SunTrust Plaza
Atlanta, Georgia 30308

This 18 day of Jan., 2006.

Peter R. York
Georgia Bar No. 781175

STATE OF GEORGIA)

COUNTY OF _____)

A F F I D A V I T

Before me, the undersigned officer, duly authorized to administer oaths, appeared _____, who upon being duly sworn, states: That he/she is records custodian for **Hill Concrete Foundations & Wall**, that any and all copies of records attached hereto are true and correct copies of the records kept in the normal course of business; and that the facts represented in the written records were entered shortly after the incidents which they purport to represent.

THIS ____ day of _____, 2006.

Records Custodian for Concrete
Foundations & Wall

Sworn to and subscribed and before me
this ____ day of _____ 2006.

Notary Public

My Commission Expires: _____