

IN THE SUPERIOR COURT OF FORSYTH COUNTY

STATE OF GEORGIA

HIGH GABLES HOMEOWNERS
ASSOCIATION, INC., et al.,

Plaintiffs,

v.

LARRY C. OLDHAM,

Defendant.

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CIVIL ACTION

FILE NO. 05 CV 2005

**PLAINTIFF HIGH GABLES HOMEOWNERS ASSOCIATION, INC.'S REQUEST
FOR PRODUCTION OF DOCUMENTS TO DEFENDANT LARRY C. OLDHAM**

COMES NOW High Gables Homeowners Association, Inc. ("High Gables"),
Plaintiff/Defendant-in-Counterclaim in the above-captioned case, and serves upon Defendant
Larry C. Oldham this Request for Production of Documents pursuant to O.C.G.A. §9-11-34(a).

You are hereby required to produce copies of the documents designated below, which are
in your possession, custody or control. You may do so by mailing copies of said documents to L.
Kristin Brock, HAWKINS & PARNELL, 4000 SunTrust Plaza, 303 Peachtree Street, N.E.,
Atlanta, Georgia 30308-3243, within thirty (30) days after service of this request.

The requested documents relating to this lawsuit and to your address a 4250 High Gables
East are as follows:

1.

Any and all documents in your possession related to the installation of the driveway.

2.

Any and all documents in your possession regarding the landscaping.

3.

Any and all documents in your possession regarding the installation of the mailbox.

4.

Any and all documents in your possession regarding the installation of the sidewalk.

5.

Any and all documents in your possession regarding communications with any neighbor(s) in connection with this lawsuit.

6.

Any and all documents in your possession to support claim for defamation, breach of fiduciary duty, and declaratory relief.

7.

Your federal and state income tax returns for the past five years.

8.

Form W-2, Form 1099 or any other tax-related document evidencing income for the past five years.

9.

Any and all videotapes, drawings or diagrams of the scene, which is the subject matter of your Counterclaim.

10.

All file materials of any person expected to testify as an expert witness at the trial of this cause, including but not limited to all notes, correspondence, reports, photographs, videotapes, drawings and diagrams made by or relied upon by the witness.

11.

A photocopy of any and all documents identified in response to Plaintiff's Interrogatories.

12.

Any and all statements of Defendant/Plaintiff-in-Counterclaim.

13.

Any and all statements of persons representing themselves to have knowledge of the matters referred to in Defendant's Counterclaim.

14.

Any and all other documents in your possession not previously requested.

This 22 day of February, 2006

HAWKINS & PARNELL, LLP



Peter R. York

Georgia Bar No. 781175

ATTORNEY FOR PLAINTIFF HIGH GABLES
HOMEOWNERS ASSOCIATION

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

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CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for Defendant in this action with a copy of the foregoing **Plaintiff High Gables Homeowners Association's First Request for Production of Documents to Defendant Larry C. Oldham** by depositing in the United States Mail a copy of same in an envelope with adequate postage thereon, addressed as follows:

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 22 day of February, 2006.



Peter R. York