

District Court, El Paso County, State of Colorado 20 E. Vermijo, Colorado Springs, CO 80903	
<hr/> In re: the Marriage of Petitioner: DEBORAH A. THORUP Respondent: DALE K. THORUP	<hr/> <p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<hr/> Attorneys for the Petitioner: Steven M. Werner #24190 Law Offices of Steven M. Werner, P.C. 301 S. Weber St. Colorado Springs, CO 80903 Phone Number: (719) 473-4885 FAX Number: (719) 473-5993 E-mail: smw1014@hotmail.com	<hr/> Case No: 01 DR 2408 Div. 6 Ctrm. 401
REQUEST FOR PRODUCTION OF DOCUMENTS	

The following Requests for Production of Documents are made upon DALE K. THORUP pursuant to C.R.C.P. Rules 16.2, 26.2 and 34(e).

Section 1. Instructions to All Parties

(a) These are general instructions. For time limitations, requirements for service on other parties, and other details, see C.R.C.P. Rules 16.2, 26.2, 34, 121, § 1-12, and the cases construing those Rules.

(b) These requests for production of documents do not change existing law relating to requests for production of documents nor do they affect an answering party's right to assert any privilege or objection.

Section 2. Instructions to the Asking Party

(a) These requests for production of documents are designed for optional use in domestic relations cases only.

(b) Check the box next to each request that you want the answering party to produce. Use care in choosing those requests for production of documents that are applicable to the case. Documents should not be requested that have been provided by disclosure or other means.

(c) The sample time periods set forth in brackets should not be longer than necessary and should be shortened where possible.

(d) Subject to the limitations in C.R.C.P. Rules 16.2 and 34, additional requests for production of documents may be attached.

Section 3. Instructions to the Answering Party

(a) An answer or other appropriate response must be given to each request for production of documents. Parties are to provide documents in response to these requests for production of documents with the understanding that they stand in a fiduciary relationship with each other.

(b) As a general rule, within **30 days** after you are served with these requests for production of documents, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See C.R.C.P. 34 for details.

(c) The response shall state with respect to each item or category that inspection and related activities will be permitted as requested, unless the request is objected to, in which event the reasons for the objection shall be stated. If an objection is made to part of an item or category, the part shall be specified and an inspection permitted of the remaining parts.

(d) A party who produces documents for inspection shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the request.

(e) Your response to these requests for production of documents must be dated and signed.

Date

Dale K. Thorup

Section 4. Definitions

Words in **BOLDFACE CAPITALS** in these requests for production of documents are defined as follows:

(a) **DOCUMENT** means a writing, as defined in CRE Rule 1001 and includes the original or a copy of handwriting, typewriting, printing, photostating, photographing, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(b) **YOU** or **YOUR** includes **YOU**, **YOUR** agents, **YOUR** employees, **YOUR** insurance companies, their agents, their employees, **YOUR** attorneys, **YOUR** accountants, **YOUR** investigators, and anyone else acting on **YOUR** behalf.

(c) PERSON includes a natural person, firm, association, organization, partnership, business, trust, corporation, or public entity.

(d) ADDRESS means the street address, including the city, state, and zip code.

Section 5. Request for Production of Documents

The following requests for production of documents and things have been approved by the Colorado Supreme Court under C.R.C.P. Rules 16.2, 26.2 and 34(e).

1. Any and all personal financial statements and/or loan applications prepared by or for YOU in the last [five years].

2. Any audited and unaudited financial statements, balance sheets, and profit and loss statements for any business entity in which YOU have more than a 10 percent equity interest, which have been prepared in the last [five years].

3. Any and all passbooks, certificates of deposit, credit union deposits, money market accounts, NOW accounts, mutual funds, and other evidence of savings accounts in which YOU or YOUR spouse has an interest or appear of record thereon, for the last [five years].

4. Any and all monthly bank statements, deposit slips, canceled checks, and check registers for every checking or other money management account in which YOU or YOUR spouse has an interest or appear of record thereon, for the last [five years].

5. Copies of all stock certificates, stock option plans, stock option certificates, vesting schedules, or warrants owned or in which either party has an interest, and copies of all DOCUMENTS establishing ownership and/or defining ownership value for all investments, or any other DOCUMENTS evidencing YOUR interest in such stock, stock options, or investments.

6. Any and all brokerage account statements and DOCUMENTS concerning any and all securities and investments owned by YOU or for YOUR benefit during the last [five years].

7. Any and all titles, certificates of registration or bills of sale for all motor vehicles, boats, trailers, campers, mobile homes, motor homes, snowmobiles and/or airplanes owned by YOU or YOUR spouse.

8. Any and all partnership or joint venture agreements and prospectuses for all partnerships or joint ventures in which YOU or YOUR spouse has participated during the last [five years].

9. Any and all shareholder's or buy-sell agreements concerning any corporation in which YOUR interest is governed by such agreement.

10. Any DOCUMENTS which set forth YOUR compensation and benefits.

11. All current employment benefit booklets for all benefits of YOUR employment, including but not limited to, all retirement benefit booklets, health and medical insurance booklets, or other benefit booklet information.

12. For all retirement and deferred compensation plans, including but not limited to pension plans, profit-sharing plans, stock plans, deferred compensation plans, 401(K) plans, SEP's and IRA's, provide the following:

a. Plan DOCUMENTS, trust agreements, and collective bargaining agreements;

b. Insurance contracts;

c. Summary Plan Descriptions and Summaries of Material Modifications;

d. Annual reports for the last [five years];

e. Summary annual reports and statements of benefits for the last [five years].

13. All appraisals, market analyses, records of purchase and sale, deeds, bills of sale, security agreements, promissory notes, and payment records for any property, including but not limited to, real estate, business interests or any kind of personal property either owned or sold within the last [five years] by YOU.

14. Any and all trust agreements in which YOU are or have been grantor, trustee or beneficiary.

15. The current binder or declaration of coverage information for all life insurance policies insuring YOUR life, the life of YOUR children and any change of beneficiary designation forms, as well as the most recent statement of cash value and loans.

16. Monthly credit card and charge account statements for the last [twelve months], from any credit card company or charge account on which YOU are a signatory, either in a personal capacity or as an authorized signator for any business or PERSON.

17. All DOCUMENTS reflecting any debts owed by YOU not already covered or otherwise requested by this Request for Production of Documents, including deeds of trust, promissory notes, and security agreements, showing when each debt was incurred, original amount of indebtedness, current indebtedness, and monthly payment requirements on each indebtedness.

18. All documentation evidencing any separate interest YOU claim in any real or personal property, including but not limited to gift and inheritance tax returns filed concerning such property.

[x] 19. All personal and business federal and state tax returns for the past five years in YOUR name individually or jointly to include all documents, schedules, and forms filed with said returns.

[x] 20. All pay records for calendar year 2002 reflecting YOUR income from your employment.

[x] 21. All records for calendar year 2002 reflecting benefits received by YOU as unemployment compensation, disability payments, or any other governmental benefit.

CERTIFICATE OF SERVICE

I hereby certify that on this December 12, 2002, a true and correct copy of the foregoing REQUEST FOR PRODUCTION OF DOCUMENTS was mailed by United States Mail, postage prepaid and addressed to:

Dale Thorup
3053 Seven Arrows Court
Canyon City, CO 81212

