

INSTRUCTIONS

1. In each of your answers to Interrogatories, you are requested to provide not only information as is in your possession, but also all information as is reasonably available, whether or not it is in your possession. In the event you are able to provide only part of the information called for by any particular Interrogatory, provide all of the information you are able to provide, and state the reason for your inability to state the remainder.

2. If you object to, or otherwise decline to answer any portion of the Interrogatories, please provide all information called for in that portion of the Interrogatory to which you do not object or to which you do not decline to answer. If you object to the Interrogatory on the ground that it is too broad (i.e., that it calls both for information which is relevant to the subject matter of the action and for information which is not relevant), please provide such information as you concede to be relevant. If you object to the Interrogatory on the ground that it would constitute an undue burden to provide an answer, please provide such requested information as can be supplied without undertaking such undue burden. For those portions of any Interrogatory to which you object or otherwise decline to answer, state the reason for such objection or declination.

KAHN, CHENKIN & RESNIK, P.L.

1815 Griffin Road, Suite 207, Dania, Florida 33004; Tel: (954) 321-0176; Fax: (954) 321-0177

DEFINITIONS

1. "Document" shall mean any written or graphic matter or other means of preserving thought or expressions and all tangible things from which information can be processed or transcribed, including the originals and all non-identified copies, whether different from the original by reason of any notation made on such copy or otherwise, including, but not limited to, correspondence, memoranda, notes, messages, letters, telegrams, teletypes, telefax, bulletins, e-mails, telecopier, meetings or other communications, inter-office and intra-office telephone calls, diaries, chronological date, minutes, books, reports, studies; summaries, pamphlets, bulletins, printed matter, charts, invoices, work sheets, receipts, returns, computer print-outs, prospectuses, financial statements, schedules, affidavits, contracts, security agreements, financing statements, promissory notes, mortgages, canceled checks, statements, transcripts, statistics, surveys, magazine or newspaper articles, releases (and any and all drafts, alterations and modifications, changes and amendments of any of the foregoing), graphic or other oral records or representations of any kind (including without limitation photographs, microfiche, microfilm, video tape, records and motion pictures), and electronic, mechanical or electric records or representations of any kind (including without limitation tapes, cassettes, discs and records).

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2. As used herein, "**RECEIVER**" shall mean **Receiver MICHAEL I. GOLDBERG**.

3. As used herein, "**NORMANDY**" shall mean **Defendants NORMANDY HOLDINGS, II, LLC and NORMANDY HOLDINGS, III, LLC**.

4. As used herein, "**SUKOFF**" shall mean **Intervenor IRA SUKOFF**.

5. "Electronic Data" as used herein shall mean the original (or identical duplicate when the original is not available), and any non-identical copies (whether non-identical because of notes made on copies or attached comments, annotations, marks, transmissions notations or highlighting of any kind) of writings of every kind and description whether inscribed by mechanical, facsimile, electronic, magnetic, digital, or other means. Electronic data includes, by way of example only, computer programs (whether private, commercial or work-in-progress), programming notes or instructions, activity listing of electronic mail receipts and/or transmittals, output resulting from the use of any software program, including word processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail, operating systems, source code of all types, peripheral drivers, PIF files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless of the media on which they reside and regardless of whether said electronic data consists in active file, deleted

file or file fragment. Electronic data includes any and all terms stored on computer memories, hard disks, floppy disks, CD-ROMs, removable media such as Bernoulli Boxes and their equivalent, magnetic tapes of all types, microfiche, punched cards, punched tape, computer chips, including, but not limited to EPROM, PROM, RAM, and ROM, on or in any other vehicle for digital data storage and/or transmittal. Electronic data also includes the file, folder tabs and/or containers and labels appended to, or associated with, any physical storage device associated with each original and/or copy.

- 9. Please state the factual basis for any claim you have against **SUKOFF** or any other manager or member of **NORMANDY** and identify each and every Document and/or Electronic Data that refers or relates thereto.

MICHAEL I. GOLDBERG, Receiver

STATE OF FLORIDA)

) SS:

COUNTY OF MIAMI-DADE)

BEFORE ME, this ___ day of _____, 2008 the undersigned authority personally appeared **MICHAEL I. GOLDBERG** who is personally know to me or who has produced _____ as identification, who, upon being first duly sworn deposes and states that he has read the above and foregoing answers to interrogatories and states that the responses are true and correct.

Print name: _____

Signature: _____

NOTARY PUBLIC, STATE OF _____

Commission No.: _____

My Commission Expires: _____

(SEAL)