

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
FILE NO.: 08 CVD 12310

GARRY D. RENTZ AND DONNA A.
RENTZ AND KRISTA C. LISTER
Plaintiff,

v.

BRADLEY COOPER,
Defendant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Notice of Deposition and Request for Production of Documents to Garry Rentz was delivered to the office of opposing counsel herein by:

Personal delivery

By facsimile

Mailing a copy thereof, postage prepaid and properly addressed, to:

Ms. Alice C. Stubbs
Tharrington Smith, LLP
PO Box 1151
Raleigh, NC 27602

This the 12th day of September, 2008



Deborah Sandlin, Attorney for Defendant
SANDLIN & DAVIDIAN, PA
5617 Departure Drive, Suite 109
Post Office Box 58569
Raleigh, North Carolina 27658-8569
Telephone: (919) 850-9199

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RENTZ AND KRISTA C. LISTER
Plaintiff,

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BRADLEY COOPER,
Defendant.

NOTICE OF DEPOSITION AND
REQUEST FOR PRODUCTION OF
DOCUMENTS

NOTICE OF DEPOSITION

Pursuant to Rule 30 of the North Carolina Rules of Civil Procedure, Defendant hereby gives notice that he will take the deposition upon oral examination of **GARRY D. RENTZ** before a Notary Public and Court Reporter, or before some other duly authorized person, on October 9, 2008 at 9:00 a.m. and continuing from day to day until completed in the offices of Sandlin & Davidian, PA, 5617 Departure Drive, Suite 109, Raleigh, NC 27616, or such other time and place as may be agreed upon by all parties. Such deposition may be accompanied with video and audio recording upon Defendant's choosing.

In addition, Defendant hereby submits the following First Request for Production of Documents to Defendant, pursuant to the provisions of Rule 26 and Rule 34 of the North Carolina Rules of Civil Procedure, said documents to be produced at the deposition of Plaintiff.

INSTRUCTIONS AND DEFINITIONS

- A. As used here, the words "record," "records," "document," or "documents" include the original and any copies of any written, printed, typed or graphic matter of any kind or nature, regardless of how produced or reproduced, any book, pamphlet, periodical, letter, memorandum, contract, agreement, invoice, bill, receipt, canceled check, telegram, report, record, study, handwritten note, working paper, paper, chart, graph, drawing sketch, index, tape, data sheet, or data processing card or any other written, whether recorded, transcribed, punched, taped, photographs, whether digital or otherwise, video recordings, audio recordings, or other electronic means that is now or was at any time in the possession, custody or control of the Plaintiffs or in the possession, custody or control of the present or former agents, representatives, employees, of the Plaintiffs, or any and all persons acting in his or her behalf. The above shall include any documents, at any time, in the possession, custody or control of such individuals or entities known by Plaintiffs to exist or have existed.
- B. As used here, the words "identify," "identity" or "identification," when used in reference to a natural person, include a request for his or her full name and present or last known address, his or her present or last known position and business affiliation, and each of his or her positions during the relevant time period requested; when used in reference to a document kept or prepared, include a request for its author, type of document (e.g., letter, memorandum, telegram, chart, photograph,

salary production, etc.), or if the above information is not available, some other means of identifying it, and its present location and name of each of its present custodians. If any document requested herein was, but no longer is in your possession, subject to your custody or control, or no longer is in existence, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) otherwise has been disposed of. In each instance above, explain the circumstances surrounding and basis for your contention that the document is missing or lost, has been destroyed or transferred. Identify any authorization for the disposition, destruction or transfer of the document and the person who authorized such. State the approximate date of the authorization, loss, destruction or transfer of any document.

- C. For any documents requested or at one time in existence but are no longer in existence, please state for each such document: (a) the type of document; (b) the date upon which it ceased to exist; (c) the circumstances under which it ceased to exist; (d) the identity of all persons having knowledge of the circumstances under which it ceased to exist; and (e) the identity of all persons having knowledge of the contents.
- D. As used here, the words "person" or "persons" include natural persons, firms, partnerships, associations, joint ventures, and corporations.
- E. As used here, the word "correspondence" includes all letters, telegrams, notices, messages, or other written communications or memoranda; and other records of conversations, meetings, conferences or other oral communications.
- F. As used here, the words "bank accounts" and other "monetary accounts" include checking accounts, savings accounts, certificates of deposit, cash in hand or held by another or any other type of account containing currency.
- G. The word "you" or "your" means the Plaintiffs.
- H. The word "Complaint," as used here, means all causes of action, answers, counterclaims, replies, motions or other responses filed in the above case number.
- I. The words "financial institution," as used herein, means any bank, savings and loan association, credit union, brokerage firm, discount brokerage firm, insurance company, mortgage company, individual investment consultant or financial consultant, or any other sales entity which is engaged in the investment buy(s), sale(s) (including short sale of stock), exchange(s), gift(s) or transfer(s) of any security investment governed by the Securities and Exchange Commission; including but not limited to the sale of stocks, bonds, commodities, futures, penny stocks, mutual funds, unit investment trust, limited partnerships, money market accounts, certificates of deposit, checking account, interest bearing checking account, or savings account.
- J. The word "children", as herein, means Isabella "Bella" Cooper and Gabriella "Katie" Cooper.
- K. In responding to these requests you shall set forth the request in full before each response. Separate responses shall be provided with respect to each request and its subdivisions. With respect to each document produced, identify the person producing the document and the paragraph or subparagraph number of the request.
- L. Wherever a request calls for the production of a document claimed to be privileged, identify the document and include what privilege is claimed and the basis for the assertion of such claim.

This Request for Production of Documents shall be deemed continuing, and you are required to supplement your responses to this Request to the extent required by Rule 26(e) of the North Carolina Rules of Civil Procedure.

DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant, pursuant to N.C. Gen. Stat. § 1A-1, Rule 34, requests that Plaintiff Garry Rentz produce and permit Defendant, through his counsel, to inspect and copy the documents described herein at the October 8, 2008 deposition of Plaintiff Garry Rentz.

1. Complete billing records, including itemized call listings and statements, for any and all land lines or cellular telephone lines for any phone leased, owned or listed to you or leased by a third party for your benefit from November 1, 2007 until date of production.

RESPONSE:

2. Any and all written correspondence between you and Nancy Cooper or her agent from November 1, 2007 until date of production.

RESPONSE:

3. Any and all correspondence between you and any person regarding the marriage of Nancy and Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

4. Any and all correspondence between you and Alice Stubbs or any other person at Tharrington Smith, LLP regarding the marriage of Nancy and Bradley Cooper from November 1, 2007 until July 11, 2008.

RESPONSE:

5. Any and all correspondence, including but not limited to e-mail, memorandum, letters, notes, text messages, blog posts, bog spots, chat room conversation or instant messages between you or your agent and any person or agency, except your attorney regarding the disappearance and/or death of Nancy Cooper, including but not limited to law enforcement and friends from July 12, 2008 through date of production.

RESPONSE:

6. Any and all correspondence, including but not limited to e-mail, memorandum, letters, notes, text messages, blog posts, bog spots, chat room

conversation or instant messages between you or your agent and any person or agency regarding Brad Cooper, Nancy Cooper, or the children, from November 1, 2007 through date of production.

RESPONSE:

7. Any and all documents or other things that support any allegation that Bradley Cooper ever attempted to commit suicide, whether as a teenager or in the "winter of 2008."

RESPONSE:

8. Any and all documents or things that support your allegation that Bradley Cooper engaged in any type of abuse against Nancy Cooper, whether emotional or physical.

RESPONSE:

9. Any and all documents or things provided to you by Nancy Cooper regarding her intention to separate from Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

10. Any and all documents or things provided to you by any person regarding the marital relationship of Nancy and Bradley Cooper from November 1, 2007 though date of production.

RESPONSE:

11. Any and all notes, documents, calendars, journals or diaries maintained by you from November 1, 2007 until date of production regarding Nancy Cooper, Brad Cooper or the children.

RESPONSE:

12. Any and all video or audio recordings depicting the voice of Nancy Cooper or Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

13. Any and all correspondence between you and Brad Cooper from November 1, 2007 until date of production.

RESPONSE:

14. Any and all documents or other things that you contend show that Brad Cooper is emotionally unstable or psychologically unstable.

RESPONSE:

15. Any and all documents or things that you contend show that Brad Cooper has acted inconsistently with his parental rights.

RESPONSE:

16. Any and all documents or things that you contend show that Brad Cooper is unfit.

RESPONSE:

17. Copies of any and all text messages, instant messages, etc. sent to or received from Nancy Cooper from November 1, 2007 through date of production.

RESPONSE:

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RESPONSE:

19. Any and all correspondence in your possession from Nancy Cooper to any other individual from November 1, 2007 through July 12, 2008.

RESPONSE:

20. Any and all documents or things that support your allegation contained in paragraph 6 of your complaint filed July 16, 2008.

RESPONSE:

21. Any and all documents or things that support your allegation in paragraph 9 of your complaint filed July 16, 2008 that Nancy Cooper never went jogging on July 12, 2008.

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22. Any and all document or thing that supports your allegation in paragraph 9 of your complaint filed July 16, 2008 that Brad Cooper was the last person to see Nancy Cooper alive.

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RESPONSE:

24. Any and all document or thing that supports your allegation that Brad Cooper yelled at Nancy Cooper and belittled her in the presence of the minor children.

RESPONSE:

25. Any and all document or thing that supports your allegation that Brad Cooper refused to provide adequate financial support to Nancy Cooper or the minor children.

RESPONSE:

26. Any and all documents or things that support your allegation that Nancy Cooper was forced to borrow funds to provide for the necessities of Nancy Cooper or the children.

RESPONSE:

27. Any and all documents or things that support your allegation that Brad Cooper "carried on" a sexual relationship with a woman other than Nancy Cooper during their marriage.

RESPONSE:

28. Any and all documents or things that support your allegation that Brad Cooper poses a danger to the physical safety of the minor children.

RESPONSE:

29. Any and all documents or things that support your allegations contained in paragraph 15 of your complaint filed July 16, 2008.

RESPONSE:

30. Any and all documents or things that support your allegations contained in paragraphs 19, 21, 23, 24, 25, 28, 29 and 31.

RESPONSE:

31. Any and all calendars, journals, notes, memorandum or other documents or things that show any appointments with Nancy Cooper, Brad Cooper or the

minor children, including but not limited to family vacations, etc. from January 1, 2007 until present.

RESPONSE:

32. Any and all correspondence, including but not limited to email, memorandum, letters, text messages, instant messages, blog posts, blog spots, or chat room conversations with Nancy Cooper or any person concerning Nancy Cooper from November 1, 2007 until present.

RESPONSE:

33. Any and all contact-information, including but not limited to email addresses, physical addresses, home and work telephone numbers, fax numbers, cellular phone numbers for any person belonging to any group centered around Nancy Cooper, her disappearance, her death, including but not limited to all members of "Friends of Nancy".

RESPONSE:

34. With regard to your complaint dated July 16, 2008, provide each and every document or thing relied upon in drafting the complaint.

RESPONSE:

35. With regard to your complaint dated July 16, 2008, provide each and every document or thing that you contend evidences your own personal knowledge and understanding of the allegations contained in paragraphs 6, 9, 12, 13, 14, 15, 16, 17, 18, 23, 24, 25, 29 and 31.

RESPONSE:

36. Any and all documents or things that evidence that Brad Cooper sought employment in Canada from November 1, 2007 until July 16, 2008.

RESPONSE:

37. Any and all computers used by you to communicate with Nancy Cooper, Brad Cooper from November 1, 2007 until date of production.

RESPONSE:

38. Any and all computers used by you to communicate with any person regarding Nancy Cooper, Brad Cooper or the children from November 1, 2007 until date of production.

RESPONSE:

39. Any and all external data storage devices, including but not limited to external hard drives, memory sticks, thumb drives, cd roms, dvds, etc. for any data regarding Nancy Cooper, Brad Cooper or the children from November 1, 2007 until present.

RESPONSE:

40. Any and all medical, psychological or pharmacy records, including but not limited to hospital records, counseling notes, diagnosis, treatment records, etc. for any and all providers from whom you have received services from January 1, 2003 through date of production.

RESPONSE:

41. Any and all documents or things regarding any forensic psychological testing conducted on you from January 1, 2003 until present.

RESPONSE:

42. Any and all medical, psychological or pharmacy records, including but not limited to hospital records, counseling notes, diagnosis, treatment records, etc. for any and all providers from whom the children have received services from July 16, 2008 until present.

RESPONSE:

43. Any and all documents or things relating to Brad Cooper's fitness as a parent, including but not limited to any draft separation agreements.

RESPONSE:

44. Any and all curriculum vitae or resume from any expert witnesses you intend to call at trial.

RESPONSE:

45. Any and all expert reports you intend to rely upon or present as evidence at trial.

RESPONSE:

46. Any and all correspondence with any expert regarding the subject matter of

this action from July 12, 2008 through date of production.

RESPONSE:

47. Any and all documents or things provided to any person you consulted as an expert in this matter.

RESPONSE:

48. Any and all correspondence between you or anyone acting upon your behalf, including but not limited to your attorney, to any private investigator regarding the marriage of Brad and Nancy Cooper.

RESPONSE:

49. Any and all correspondence between you and anyone acting upon your behalf, including but not limited to your attorney, to any private investigator regarding the disappearance or death of Nancy Cooper.

RESPONSE:

50. Any and all documents or things you intend to tender as exhibits at trial.

RESPONSE:

This the 12th day of September 2008.

Deborah Sandlin

Deborah Sandlin
Sandlin & Davidian, P.A.
P.O. Box 58569
Raleigh, North Carolina 27658
Telephone: 919-850-9199
Telecopier: 919-850-9699

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BRADLEY COOPER,
Defendant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Notice of Deposition and Request for Production of Documents to Donna A. Rentz was delivered to the office of opposing counsel herein by:

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By facsimile

Mailing a copy thereof, postage prepaid and properly addressed, to:

Ms. Alice C. Stubbs
Tharrington Smith, LLP
PO Box 1151
Raleigh, NC 27602

This the 12th day of September, 2008

Deborah Sandlin

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NOTICE OF DEPOSITION

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- B. As used here, the words "identify," "identity" or "identification," when used in reference to a natural person, include a request for his or her full name and present or last known address, his or her present or last known position and business affiliation, and each of his or her positions during the relevant time period requested; when used in reference to a document kept or prepared, include a request for its author, type of document (e.g., letter, memorandum, telegram, chart, photograph,

salary production, etc.), or if the above information is not available, some other means of identifying it, and its present location and name of each of its present custodians. If any document requested herein was, but no longer is in your possession, subject to your custody or control, or no longer is in existence, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) otherwise has been disposed of. In each instance above, explain the circumstances surrounding and basis for your contention that the document is missing or lost, has been destroyed or transferred. Identify any authorization for the disposition, destruction or transfer of the document and the person who authorized such. State the approximate date of the authorization, loss, destruction or transfer of any document.

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RESPONSE:

This the 12th day of September 2008.

Deborah Sandlin

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P.O. Box 58569
Raleigh, North Carolina 27658
Telephone: 919-850-9199
Telecopier: 919-850-9699

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
FILE NO.: 08 CVD 12310

GARRY D. RENTZ AND DONNA A.
RENTZ AND KRISTA C. LISTER
Plaintiff,

v.

BRADLEY COOPER,
Defendant.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the Notice of Deposition and Request for Production of Documents to Krista C. Lister was delivered to the office of opposing counsel herein by:

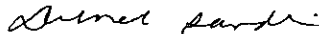
Personal delivery

By facsimile

Mailing a copy thereof, postage prepaid and properly addressed, to:

Ms. Alice C. Stubbs
Tharrington Smith, LLP
PO Box 1151
Raleigh, NC 27602

This the 12th day of September, 2008



Deborah Sandlin, Attorney for Defendant
SANDLIN & DAVIDIAN, PA
5617 Departure Drive, Suite 109
Post Office Box 58569
Raleigh, North Carolina 27658-8569
Telephone: (919) 850-9199

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
DISTRICT COURT DIVISION
FILE NO.: 08 CVD 12310

**GARRY D. RENTZ AND DONNA A.
RENTZ AND KRISTA C. LISTER**
Plaintiff,

v.

BRADLEY COOPER,
Defendant.

**NOTICE OF DEPOSITION AND
REQUEST FOR PRODUCTION OF
DOCUMENTS**

NOTICE OF DEPOSITION

Pursuant to Rule 30 of the North Carolina Rules of Civil Procedure, Defendant hereby gives notice that he will take the deposition upon oral examination of **KRISTA LISTER** before a Notary Public and Court Reporter, or before some other duly authorized person, on October 10, 2008 at 9:00 a.m. and continuing from day to day until completed, in the offices of Sandlin & Davidian, PA, 5617 Departure Drive, Suite 109, Raleigh, NC 27616, or such other time and place as may be agreed upon by all parties. Such deposition may be accompanied with video and audio recording upon Defendant's choosing.

In addition, Defendant hereby submits the following First Request for Production of Documents to Defendant, pursuant to the provisions of Rule 26 and Rule 34 of the North Carolina Rules of Civil Procedure, said documents to be produced at the deposition of Plaintiff.

INSTRUCTIONS AND DEFINITIONS

- A. As used here, the words "record," "records," "document," or "documents" include the original and any copies of any written, printed, typed or graphic matter of any kind or nature, regardless of how produced or reproduced, any book, pamphlet, periodical, letter, memorandum, contract, agreement, invoice, bill, receipt, canceled check, telegram, report, record, study, handwritten note, working paper, paper, chart, graph, drawing sketch, index, tape, data sheet, or data processing card or any other written, whether recorded, transcribed, punched, taped, photographs, whether digital or otherwise, video recordings, audio recordings, or other electronic means that is now or was at any time in the possession, custody or control of the Plaintiffs or in the possession, custody or control of the present or former agents, representatives, employees, of the Plaintiffs, or any and all persons acting in his or her behalf. The above shall include any documents, at any time, in the possession, custody or control of such individuals or entities known by Plaintiffs to exist or have existed.
- B. As used here, the words "identify," "identity" or "identification," when used in reference to a natural person, include a request for his or her full name and present or last known address, his or her present or last known position and business affiliation, and each of his or her positions during the relevant time period requested; when used in reference to a document kept or prepared, include a request for its author, type of document (e.g., letter, memorandum, telegram, chart, photograph,

salary production, etc.), or if the above information is not available, some other means of identifying it, and its present location and name of each of its present custodians. If any document requested herein was, but no longer is in your possession, subject to your custody or control, or no longer is in existence, state whether it: (a) is missing or lost; (b) has been destroyed; (c) has been transferred voluntarily or involuntarily to others; or (d) otherwise has been disposed of. In each instance above, explain the circumstances surrounding and basis for your contention that the document is missing or lost, has been destroyed or transferred. Identify any authorization for the disposition, destruction or transfer of the document and the person who authorized such. State the approximate date of the authorization, loss, destruction or transfer of any document.

- C. For any documents requested or at one time in existence but are no longer in existence, please state for each such document: (a) the type of document; (b) the date upon which it ceased to exist; (c) the circumstances under which it ceased to exist; (d) the identity of all persons having knowledge of the circumstances under which it ceased to exist; and (e) the identity of all persons having knowledge of the contents.
- D. As used here, the words "person" or "persons" include natural persons, firms, partnerships, associations, joint ventures, and corporations.
- E. As used here, the word "correspondence" includes all letters, telegrams, notices, messages, or other written communications or memoranda; and other records of conversations, meetings, conferences or other oral communications.
- F. As used here, the words "bank accounts" and other "monetary accounts" include checking accounts, savings accounts, certificates of deposit, cash in hand or held by another or any other type of account containing currency.
- G. The word "you" or "your" means the Plaintiffs.
- H. The word "Complaint," as used here, means all causes of action, answers, counterclaims, replies, motions or other responses filed in the above case number.
- I. The words "financial institution," as used herein, means any bank, savings and loan association, credit union, brokerage firm, discount brokerage firm, insurance company, mortgage company, individual investment consultant or financial consultant, or any other sales entity which is engaged in the investment buy(s), sale(s) (including short sale of stock), exchange(s), gift(s) or transfer(s) of any security investment governed by the Securities and Exchange Commission; including but not limited to the sale of stocks, bonds, commodities, futures, penny stocks, mutual funds, unit investment trust, limited partnerships, money market accounts, certificates of deposit, checking account, interest bearing checking account, or savings account.
- J. The word "children", as herein, means Isabella "Bella" Cooper and Gabriella "Katie" Cooper.
- K. In responding to these requests you shall set forth the request in full before each response. Separate responses shall be provided with respect to each request and its subdivisions. With respect to each document produced, identify the person producing the document and the paragraph or subparagraph number of the request.
- L. Wherever a request calls for the production of a document claimed to be privileged, identify the document and include what privilege is claimed and the basis for the assertion of such claim.

This Request for Production of Documents shall be deemed continuing, and you are required to supplement your responses to this Request to the extent required by Rule 26(e) of the North Carolina Rules of Civil Procedure.

DEFENDANT'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

Defendant, pursuant to N.C. Gen. Stat. § 1A-1, Rule 34, requests that Plaintiff Garry Rentz produce and permit Defendant, through his counsel, to inspect and copy the documents described herein at the October 8, 2008 deposition of Plaintiff Garry Rentz.

1. Complete billing records, including itemized call listings and statements, for any and all land lines or cellular telephone lines for any phone leased, owned or listed to you or leased by a third party for your benefit from November 1, 2007 until date of production.

RESPONSE:

2. Any and all written correspondence between you and Nancy Cooper or her agent from November 1, 2007 until date of production.

RESPONSE:

3. Any and all correspondence between you and any person regarding the marriage of Nancy and Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

4. Any and all correspondence between you and Alice Stubbs or any other person at Tharrington Smith, LLP regarding the marriage of Nancy and Bradley Cooper from November 1, 2007 until July 11, 2008.

RESPONSE:

5. Any and all correspondence, including but not limited to e-mail, memorandum, letters, notes, text messages, blog posts, bog spots, chat room conversation or instant messages between you or your agent and any person or agency, except your attorney regarding the disappearance and/or death of Nancy Cooper, including but not limited to law enforcement and friends from July 12, 2008 through date of production.

RESPONSE:

6. Any and all correspondence, including but not limited to e-mail, memorandum, letters, notes, text messages, blog posts, bog spots, chat room

conversation or instant messages between you or your agent and any person or agency regarding Brad Cooper, Nancy Cooper, or the children, from November 1, 2007 through date of production.

RESPONSE:

7. Any and all documents or other things that support any allegation that Bradley Cooper ever attempted to commit suicide, whether as a teenager or in the "winter of 2008."

RESPONSE:

8. Any and all documents or things that support your allegation that Bradley Cooper engaged in any type of abuse against Nancy Cooper, whether emotional or physical.

RESPONSE:

9. Any and all documents or things provided to you by Nancy Cooper regarding her intention to separate from Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

10. Any and all documents or things provided to you by any person regarding the marital relationship of Nancy and Bradley Cooper from November 1, 2007 through date of production.

RESPONSE:

11. Any and all notes, documents, calendars, journals or diaries maintained by you from November 1, 2007 until date of production regarding Nancy Cooper, Brad Cooper or the children.

RESPONSE:

12. Any and all video or audio recordings depicting the voice of Nancy Cooper or Bradley Cooper from November 1, 2007 until date of production.

RESPONSE:

13. Any and all correspondence between you and Brad Cooper from November 1, 2007 until date of production.

RESPONSE:

14. Any and all documents or other things that you contend show that Brad Cooper is emotionally unstable or psychologically unstable.

RESPONSE:

15. Any and all documents or things that you contend show that Brad Cooper has acted inconsistently with his parental rights.

RESPONSE:

16. Any and all documents or things that you contend show that Brad Cooper is unfit.

RESPONSE:

17. Copies of any and all text messages, instant messages, etc. sent to or received from Nancy Cooper from November 1, 2007 through date of production.

RESPONSE:

18. Copies of any and all text messages, instant messages, etc. sent to or received from any person regarding the disappearance or murder of Nancy Cooper.

RESPONSE:

19. Any and all correspondence in your possession from Nancy Cooper to any other individual from November 1, 2007 through July 12, 2008.

RESPONSE:

20. Any and all documents or things that support your allegation contained in paragraph 6 of your complaint filed July 16, 2008.

RESPONSE:

21. Any and all documents or things that support your allegation in paragraph 9 of your complaint filed July 16, 2008 that Nancy Cooper never went jogging on July 12, 2008.

RESPONSE:

22. Any and all document or thing that supports your allegation in paragraph 9 of your complaint filed July 16, 2008 that Brad Cooper was the last person to see Nancy Cooper alive.

RESPONSE:

23. Any and all document or thing that supports your allegations that Brad Cooper was emotionally abusive of the children.

RESPONSE:

24. Any and all document or thing that supports your allegation that Brad Cooper yelled at Nancy Cooper and belittled her in the presence of the minor children.

RESPONSE:

25. Any and all document or thing that supports your allegation that Brad Cooper refused to provide adequate financial support to Nancy Cooper or the minor children.

RESPONSE:

26. Any and all documents or things that support your allegation that Nancy Cooper was forced to borrow funds to provide for the necessities of Nancy Cooper or the children.

RESPONSE:

27. Any and all documents or things that support your allegation that Brad Cooper "carried on" a sexual relationship with a woman other than Nancy Cooper during their marriage.

RESPONSE:

28. Any and all documents or things that support your allegation that Brad Cooper poses a danger to the physical safety of the minor children.

RESPONSE:

29. Any and all documents or things that support your allegations contained in paragraph 15 of your complaint filed July 16, 2008.

RESPONSE:

30. Any and all documents or things that support your allegations contained in paragraphs 19, 21, 23, 24, 25, 28, 29 and 31.

RESPONSE:

31. Any and all calendars, journals, notes, memorandum or other documents or things that show any appointments with Nancy Cooper, Brad Cooper or the

minor children, including but not limited to family vacations, etc. from January 1, 2007 until present.

RESPONSE:

32. Any and all correspondence, including but not limited to email, memorandum, letters, text messages, instant messages, blog posts, blog spots, or chat room conversations with Nancy Cooper or any person concerning Nancy Cooper from November 1, 2007 until present.

RESPONSE:

33. Any and all contact information, including but not limited to email addresses, physical addresses, home and work telephone numbers, fax numbers, cellular phone numbers for any person belonging to any group centered around Nancy Cooper, her disappearance, her death, including but not limited to all members of "Friends of Nancy".

RESPONSE:

34. With regard to your complaint dated July 16, 2008, provide each and every document or thing relied upon in drafting the complaint.

RESPONSE:

35. With regard to your complaint dated July 16, 2008, provide each and every document or thing that you contend evidences your own personal knowledge and understanding of the allegations contained in paragraphs 6, 9, 12, 13, 14, 15, 16, 17, 18, 23, 24, 25, 29 and 31.

RESPONSE:

36. Any and all documents or things that evidence that Brad Cooper sought employment in Canada from November 1, 2007 until July 16, 2008.

RESPONSE:

37. Any and all computers used by you to communicate with Nancy Cooper, Brad Cooper from November 1, 2007 until date of production.

RESPONSE:

38. Any and all computers used by you to communicate with any person regarding Nancy Cooper, Brad Cooper or the children from November 1, 2007 until date of production.

RESPONSE:

39. Any and all external data storage devices, including but not limited to external hard drives, memory sticks, thumb drives, cd roms, dvds, etc. for any data regarding Nancy Cooper, Brad Cooper or the children from November 1, 2007 until present.

RESPONSE:

40. Any and all medical, psychological or pharmacy records, including but not limited to hospital records, counseling notes, diagnosis, treatment records, etc. for any and all providers from whom you have received services from January 1, 2003 through date of production.

RESPONSE:

41. Any and all documents or things regarding any forensic psychological testing conducted on you from January 1, 2003 until present.

RESPONSE:

42. Any and all medical, psychological or pharmacy records, including but not limited to hospital records, counseling notes, diagnosis, treatment records, etc. for any and all providers from whom the children have received services from July 16, 2008 until present.

RESPONSE:

43. Any and all documents or things relating to Brad Cooper's fitness as a parent, including but not limited to any draft separation agreements.

RESPONSE:

44. Any and all curriculum vitae or resume from any expert witnesses you intend to call at trial.

RESPONSE:

45. Any and all expert reports you intend to rely upon or present as evidence at trial.

RESPONSE:

46. Any and all correspondence with any expert regarding the subject matter of

this action from July 12, 2008 through date of production.

RESPONSE:

47. Any and all documents or things provided to any person you consulted as an expert in this matter.

RESPONSE:

48. Any and all correspondence between you or anyone acting upon your behalf, including but not limited to your attorney, to any private investigator regarding the marriage of Brad and Nancy Cooper.

RESPONSE:

49. Any and all correspondence between you and anyone acting upon your behalf, including but not limited to your attorney, to any private investigator regarding the disappearance or death of Nancy Cooper.

RESPONSE:

50. Any and all documents or things you intend to tender as exhibits at trial.

RESPONSE:

This the 12th day of September 2008.

Deborah Sandlin

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