LAW OFFICES OF MYRON D. MILCH, PC Continental Plaza III 433 Hackensack Avenue— Second Floor Hackensack, N. J. 07601 Tel. (201) 342-2868 Fax (201) 342-7391 Attorney for Plaintiff

Plaintiff vs. Defendant SUPERIOR COURT OF NEW JERSEY LAW DIVISION: COUNTY DOCKET NO.: CIVIL ACTION ORDER FOR DISCOVERY

UPON reading the annexed verified Petition, it is on this

day of

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ORDERED that the Witness, appear and testify, under oath, about the income and assets of the Defendant-judgment-debtor, at the Law Offices of Myron D. Milch, P.C., Continental Plaza III, 433 Hackensack Avenue, Hackensack, New Jersey 07601 on, at .M.; and it is

FURTHER ORDERED that the Witness produce at the time and place set forth above the books, records and documents and information set forth on the attached Schedule(s); and it is

FURTHER ORDERED that a copy of this ORDER, which may be certified as a true copy by the Attorney for the Plaintiff, be served upon the witness to be deposed personally or by registered or certified mail, return receipt requested, at least ten (10) days before the date for appearance fixed herein.

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SCHEDULE A

(For individual judgment debtors)

- 1. Copies of statements of all bank statements, savings accounts, certificates of deposit and trust accounts in which Defendant-judgment-debtor is or was a beneficiary or has or had any signing power or authority, for the last four (4) years;
- 2. Copies of all deeds for all real property owned, in whole or in part, by the judgment debtor, during any part of the last four (4) years;
- 3. Copies of mortgages for all properties in which the Defendant-judgment-debtor had any legal or equitable interest during any part of the last four (4) years;
- 4. All contracts for sale of real properties owned, in whole or in part, by the judgment debtor;
- 5. The names and last known addresses of all persons who have leased as tenants an interest in all or any portion of the real properties owned, in whole or in part, by the judgment debtor;
- 6. The names and current addresses of all persons or entities that have leased any interest in real estate to the Defendant-judgment-debtor in the last four (4) years, together with a true copy of all such leases;
- 7. Copies of all Federal and State income tax returns of the Defendant-judgment-debtor, and of every entity, whether such entity is a proprietorship, general partnership, limited partnership, corporation or limited liability entity, over which the Defendant-judgment-debtor exercises, has exercised, maintains or has maintained effective control, for the last four (4) years;
- 8. Copies of the judgment debtor's accounts receivable ledger and /or accounts receivables;
- 9. Copies of any and all applications for bank loans made by the judgment debtor in the last four (4) years;
- 10. Copies of any and all trust instruments executed by the judgment debtor as settlor the last four (4) years;
- 11. Copies of any and all assignments of any asset, real or personal, tangible or intangible, executed by the judgment debtor the last four (4) years;
- 12. Any and all security agreements and UCC-1 financing statements executed by the judgment debtor the last four (4) years;
- 13. True copies of payroll receipt records of Defendant-judgment-debtor, including W-2 and 1099 forms, for the last 24 months;

- 14. Life insurance policies, in force during any portion of the prior four (4) years, insuring the life of Defendant-judgment-debtor or in which Defendant-judgment-debtor has or had any legal, equitable or ownership interest;
- 15. All documents substantiating the purchase, ownership, rental, lease and/or any possessory interest, over the last four (4) years, by judgment debtor and/or any entity in which the judgment debtor has or has had any interest, in any motor vehicle;
- 16. All stock certificates and/or bond certificates, or receipts for the same, in the name of the Defendant-judgment-debtor and/or any entity in which the Defendant-judgment-debtor has had any interest within the last four (4) years;
- 17. Brokerage statements for all accounts maintained by the Defendant-judgment-debtor or any entity in which Defendant-judgment-debtor has had any interest, for the last four (4) years, including brokerage statements for each and every account, of whatever kind or nature;
- 18. Statements for each and every retirement plan, IRA and/or 401(K) Plan, or Keogh Plan in the name of the Defendant judgment debtor and/or any entity in which the Defendant judgment debtor has had an interest or had an interest, for the last four (4) years;
- 19. Statements for all credit card accounts or charge account cards in the name of the Defendant judgment debtor and/or any entity in which the Defendant judgment debtor has had an interest, for the last four (4) years;
 - 20. All Promissory Notes, accounts receivable, contract receivables or any other evidences of indebtedness owed by third-parties to the Defendant judgment debtor, for the last four (4) years;
- 21. All documents substantiating ownership and/or any interest in a cooperative apartment in which the Defendant judgment debtor has had an interest, for the last four (4) years;
- 22. All documents substantiating judgment debtor's interest or membership in any partnership, limited partnership, limited liability company, limited liability partnership or the like, and/or joint venture in which the Defendant judgment debtor has had an interest or membership, for the last four (4) years;
- 23. Insurance policies, in force at any time within the last four (4) years, that provided insurance protection for personal or business property or possessions of the Defendant-judgment-debtor;
- 24. True and complete documents setting forth the existence, nature, identity and extent of any "Structured Settlement" involving the Defendant-judgment-debtor herein and another party in another action, including, by way of illustration and

not limitation, the name, address, telephone number and account number of the person, company or party obligated to make any payments due under the "Structured Settlement" and the date or dates of all payments, both payments already made and payments due in the future.

- 25. True copies of all judgments, liens or claims by which the Defendant-judgment-debtor herein is entitled to any money or things of value;
- 26. A description of all property, whether real, personal or mixed, which the Defendant has transferred to any other person or entity, during the last four (4) years, together with a description of the consideration received for each such transfer and the name and current address of each such transferee.

SCHEDULE B

(For the corporate or limited liability entity defendant)

- 1. Bank statements for all banking accounts maintained by the judgment debtor for the months of, or ending in the months of April 2002, May 2002, June 2002, July 2002;
- 2. The address, including lot and block number, for all real properties owned, in whole or in part, by the judgment debtor;
- 3. All contracts for sale of real properties owned, in whole or in part, by the judgment debtor;
- 4. The names and last known addresses of all persons who have leased an interest in all or any portion of the real properties owned, in whole or in part, by the judgment debtor;
- 5. Copies of all income tax returns, state and federal, filed by the judgment debtor for 1999, 2000 and 2001;
- 6. Copies of the judgment debtor's accounts receivable ledger and/or accounts receivable:
- 7. Any applications for bank loans filed by the judgment debtor in 2000 or 2001;
- 8. The names and addresses of all clients of the limited liability corporation, retainer agreements for all clients and, if there is no retainer agreement, a copy of all letters to the clients stating the basis on which they will be charged;
- 9. With respect to cases in which a client of the judgment debtor is suing a defendant and an insurance company is handling the defense of the claim, a) the name of the action, b) the name and address of the insurance company, c) the name of the insured, d) the policy number, if known, e) the name of counsel appearing on behalf of each insured, f) any and all settlement agreements, g) any liens on a recovery in favor of the plaintiff, h) the trial date, if scheduled, or the date of a settlement conference and i) the name, if any, of the judge assigned to hear the action;
- 10. Any and all deeds by which the judgment debtor has conveyed any interest in real estate since June 1999;
- 11. Any and all trust instruments executed by the judgment debtor as settlor since June 1999;
- 12. Any and all assignments of any asset, real or personal, tangible or intangible, executed by the judgment debtor since June 1999;

- 13. The names and current addresses of any and all lawyers to whom the judgment debtor has referred any clients since June 1999 and from whom the judgment debtor may receive a fee for having referred the client; and
- 14. Any and all security agreements and UCC-1 financing statements executed by the judgment debtor since June 1997.

SCHEDULE C

- 1. True copies of payroll receipt records of Defendant-judgment-debtor, including W-2 and 1099 forms, for the last 24 months;
- 2. Statements of bank accounts, checking accounts, savings accounts, certificates of deposit and trust accounts, for the past 24 months, in which Defendant-judgment-debtor is or was a beneficiary or has or had any signing power or authority;
- 3. Life insurance policies, in force during any portion of the prior 24 months, insuring the life of Defendant-judgment-debtor or in which Defendant-judgment-debtor has or had any ownership interest;
- 4. Deeds to any real property in which Defendant-judgment-debtor has had any interest within the last 24 months;
- 5. Mortgages on real property on which Defendant-judgment-debtor is or has been the mortgagee within the last 24 months;
- 6. All documents substantiating the purchase, ownership, rental, lease and/or any possessory interest, over the last 24 months, by judgment debtor and/or any entity in which the judgment debtor has or has had any interest, in any motor vehicle;
- 7. Federal and State income tax returns of the Defendant-judgment-debtor, and Federal and State tax returns for every entity, whether such entity is a proprietorship, general partnership, limited partnership, corporation or limited liability entity, over which the Defendant-judgment-debtor exercises, has exercised, maintains or has maintained effective control, for the last 2 years.
- 8. All stock certificates and/or bond certificates in the name of the Defendant-judgment-debtor and/or any entity in which the Defendant-judgment-debtor has had any interest within the last 12 months;
- 9. Brokerage statements for all accounts maintained by the Defendant-judgment-debtor or any entity in which Defendant-judgment-debtor has had any interest, within the last 24 months, including brokerage statements for each and every account, of whatever kind or nature;
- 10. Statements for each and every retirement plan, IRA and/or 401(K) Plan, or Keogh Plan in the name of the Defendant judgment debtor and/or any entity in which the Defendant judgment debtor has had an interest or had an interest within the last 24 months;
- 11. Statements for all credit card accounts or charge account cards in the name of the Defendant judgment debtor and/or any entity in which the Defendant judgment debtor has had an interest, within the 24 months;

- 12. All Promissory Notes, accounts receivable, contract receivables or any other evidences of indebtedness owed by third-parties to the Defendant judgment debtor, within the last 24 months;
- 13. All documents substantiating ownership and/or any interest in a cooperative apartment in which the Defendant judgment debtor has had an interest within the last 24 months;
- 14. All documents substantiating judgment debtor's interest or membership in any partnership, limited partnership, limited liability company, limited liability partnership or the like, and/or joint venture in which the Defendant judgment debtor has had an interest or membership within the last 24 months;
- 15. Insurance policies, in force at any time within the last 24 months, that provided insurance protection for personal or business property or possessions of the Defendant-judgment-debtor.
- 16. True and complete documents setting forth the existence, nature, identity and extent of any "Structured Settlement" involving the Defendant-judgment-debtor herein and another party in another action, including, by way of illustration and not limitation, the name, address, telephone number and account number of the person, company or party obligated to make any payments due under the "Structured Settlement" and the date or dates of all payments, both payments already made and payments due in the future.
- 17. True copies of all judgments, liens or claims in which the Defendant-judgment-debtor herein is entitled to any money or things of value;
- 17. A detailed description of all property, whether real, personal or mixed, which the Defendant has transferred to any other person or entity, from January 1, 1997 through the present date, together with a description of the consideration received for each such transfer and the name and current address of each such transferee; and it is