

STEPHEN QUESENBERRY (8073)
J. BRYAN QUESENBERRY (9156)
CHRISTOPHER INFANGER (12561)
HILL, JOHNSON & SCHMUTZ, L.C.

RiverView Plaza, Suite 300
4844 North 300 West
Provo, Utah 84604
Telephone: 801-375-6600
Facsimile: 801-375-3865
squesenberry@hjslaw.com
jbquesenberry@hjslaw.com
cinfanger@hjslaw.com

Attorneys for Defendants Wendell A. and Allen R. Jacobson

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE
COMMISSION,

Plaintiff,

vs.

MANAGEMENT SOLUTIONS, INC., a
Texas Corporation; WENDELL A.
JACOBSON and ALLEN R. JACOBSON,

Defendants.

Case No. 2:11-CV-01165

Judge Bruce S. Jenkins

**“CORRECTED” NOTICE OF ISSUANCE OF A SUBPOENA TO PRODUCE
DOCUMENTS, INFORMATION OR OBJECTS AND
TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, DIRECTED TO:
DELOITTE FINANCIAL ADVISORY SERVICES, LLP**

Defendants hereby give notice, pursuant to Fed. R. Civ. P. 45(b)(1), that the attached
Subpoena to Produce Documents, Information or Objects and to Testify at a Deposition in a

Civil Action, directed to Deloitte Financial Advisory Services, LLP, has been issued and will be served upon Deloitte Financial Advisory Services, LLP, in accordance with the above-noted Rule.

Dated this 5th day of February, 2013.

Respectfully submitted,

/s/ Stephen Quesenberry

Hill, Johnson & Schmutz
RiverView Plaza, Suite 300
4844 North 300 West
Provo, UT 84604-5663
Telephone: 801-375-6600
Facsimile: 801-375-3865
Email: squesenberry@hjslaw.com

ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on the 5th day of February, 2013, a true and correct copy of the foregoing **“CORRECTED” NOTICE OF ISSUANCE OF A SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS, AND TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION, DIRECTED TO DELOITTE FINANCIAL ADVISORY SERVICES, LLP**, was sent to the following:

VIA ELECTRONIC MAIL:

Steven J. McCardell - smccardell@djplaw.com, khughes@djplaw.com

Kenneth L. Cannon, II - kcannon@djplaw.com, khughes@djplaw.com

George W. Pratt - gpratt@joneswaldo.com, bparry@joneswaldo.com

Kim R. Wilson - krw@scmlaw.com

Matthew C Barneck - matthew-barneck@rbmn.com, francine-caserta@rbmn.com

John A. Beckstead - jabeckstead@hollandhart.com, intaketeam@hollandhart.com,
pmwatson@hollandhart.com, slclitdocket@hollandhart.com

David K. Broadbent - dbroadbent@hollandhart.com, intaketeam@hollandhart.com,
lsharp@hollandhart.com, slclitdocket@hollandhart.com

Steven W. Call - scall@rqn.com, docket@rqn.com, lconterio@rqn.com

Robert S. Clark - rclark@parrbrown.com, achandler@parrbrown.com,
calendar@parrbrown.com

Mark R. Gaylord - gaylord@ballardspahr.com, goodalem@ballardspahr.com,
saltlakedocketclerk@ballardspahr.com

Jeremy M. Hoffman - jmhoffman@yahlaw.com, linda@yahlaw.com

Mark F James - mjames@hjdllaw.com

Lon A. Jenkins - lajenkins@joneswaldo.com, lgonzales@joneswaldo.com,
vsmoot@joneswaldo.com

Thomas M Melton - meltont@sec.gov, #SLRO-Docket@sec.gov

Jeffrey E. Nelson - Jeff.Nelson@usdoj.gov

Steven T. Waterman - waterman.steven@dorsey.com, bingham.karen@dorsey.com,
slc.lit@dorsey.com, smith.ron@dorsey.com

John L. Young - jlyoung@yahlaw.com, linda@yahlaw.com

Steven C. Strong - scs@pkhlawyers.com

J. Scott Brown - sb@pkhlawyers.com, kw@pkhlawyers.com

Matthew N. Evans - mevans@rqn.com, docket@rqn.com, erutter@rqn.com

Joseph Covey- jcovey@parrbrown.com, calendar@parrbrown.com

Jason D. Boren - borenj@ballardspahr.com, brownld@ballardspahr.com,
saltlakedocketclerk@ballardspahr.com

Alison J. Okinaka okinaka@sec.gov

Stephen E. Quesenberry - squesenberry@hjslaw.com, stacir@hjslaw.com

John H. Bogart - jbogart@telosvg.com

Amy F. Sorenson - asorenson@swlaw.com, docket_slc@swlaw.com,
phaslam@swlaw.com

D. Zachary Wiseman - zwiseman@rqn.com, docket@rqn.com, lmcgee@rqn.com

Matthew T. Wirthlin - mwirthlin@hollandhart.com, intaketeam@hollandhart.com,
lsharp@hollandhart.com, slclitdocket@hollandhart.com

Wayne Z. Bennett - wayne-bennett@rbmn.com, patsy-bowman@rbmn.com

Paul N. Feindt - feindtp@sec.gov

Gregory N. Hoole - gregh@hooleking.com, whitneyh@hooleking.com

Adelaide Maudsley - maudsley@chapman.com

James B. Quesenberry - jbquesenberry@hjslaw.com

Gregory S. Roberts - groberts@rqn.com, bsears@rqn.com, docket@rqn.com

Romaine C. Marshall - rcmarshall@hollandhart.com, intaketeam@hollandhart.com,

lcpaul@hollandhart.com, slclitdocket@hollandhart.com

Matthew L. Moncur - moncurm@ballardspahr.com, goodalem@ballardspahr.com,

saltlakedocketclerk@ballardspahr.com

Royce B. Covington - rcovington@parrbrown.com, calendar@parrbrown.com,

jshowalter@parrbrown.com

Jared C. Fields - jfields@swlaw.com, cwinkelman@swlaw.com, docket_slc@swlaw.com

Heidi G. Goebel - heidi.goebel@chrisjen.com, goebel_heidi@hotmail.com,

karen.harwood@chrisjen.com

Mark Wilson Williams - mwilliams@shermanhoward.com,

dfouts@shermanhoward.com, efiling@sah.com

Daniel J. Wadley - wadleyd@sec.gov

Eric K. Jenkins - ericjenkins@chrisjen.com, judy.garrett@chrisjen.com,

ramona.gray@chrisjen.com

J. Andrew Sjoblom - jasjoblom@hollandhart.com, bblarsen@hollandhart.com,

intaketeam@hollandhart.com, phowell@hollandhart.com, plgray@hollandhart.com,
slclitdocket@hollandhart.com

Tammy B. Georgelas - tbg@scmlaw.com, intakeclerk@scmlaw.com

Cory A. Talbot - catalbot@hollandhart.com, intaketeam@hollandhart.com,
phowell@hollandhart.com, slclitdocket@hollandhart.com

Doyle S. Byers - dsbyers@hollandhart.com, bknoble@hollandhart.com,
intaketeam@hollandhart.com, slclitdocket@hollandhart.com

Scott A. Cummings - cummings.scott@dorsey.com, long.candy@dorsey.com,
slc.lit@dorsey.com, smith.ron@dorsey.com

Jessica P. Wilde - jwilde@joneswaldo.com, bparry@joneswaldo.com

David R. Hague - dhague@fabianlaw.com, dromero@fabianlaw.com

Christopher R. Infanger - CInfanger@HJSLaw.com, cripacer@gmail.com,
stacir@hjslaw.com

Brandon C. Pond - bcpond@chapman.com

Ashton J. Hyde - ahyde@fabianlaw.com, smcnett@fabianlaw.com

Brian C. Mitchell - brian.mitchell@bgllp.com, janice.scanlan@bgllp.com,
yolanda.mungia@bgllp.com

Sam M. Stricklin - sam.stricklin@bgllp.com, janice.scanlan@bgllp.com,
linda.nickel@bgllp.com

John P. Kincade - jkincade@winstead.com, gcox@winstead.com,
jrobertson@winstead.com

Deanna E. Caldwell - dcaldwell@winstead.com, jrobertson@winstead.com

James Richard White - jrwhite@winstead.com

Jason M. Ross - jross@cttlegal.com, svhunter@cttlegal.com

Edwin J. Tomko - etomko@cttlegal.com, svhunter@cttlegal.com

Robert S. Glass - rglass@glasswilkin.com, jrobinson@glasswilkin.com,
shalowell@glasswilkin.com

Philip D. Hixon - phixon@glasswilkin.com, jrobinson@glasswilkin.com,
shalowell@glasswilkin.com

Robert P. Skeith - rskeith@glasswilkin.com, jrobinson@glasswilkin.com,
shalowell@glasswilkin.com

Scott A. Shanes - scott.shanes@strasburger.com, anne.white@strasburger.com

Julie K. Biermacher - julie.biermacher@strasburger.com

M. Scott Barnard - sbarnard@akingump.com, syork-cockrill@akingump.com

Alan M. Hayes - amhayes@akingump.com, lmonreal@akingump.com

Heather L. Peckham - hpeckham@akingump.com, lmonreal@akingump.com

Via U.S. Mail:

Douglas M Durbano
DURBANO LAW FIRM
476 W HERITAGE PARK BLVD
STE 200
LAYTON, UT 84041

Greg B. Bailey
PO BOX 298
FOUNTAIN GREEN, UT 84632

Jacob D. Briggs
DURBANO LAW FIRM PC
476 W HERITAGE PARK BLVD STE 200
LAYTON, UT 84041

/s/ Stephen Quesenberry

EXHIBIT A

UNITED STATES DISTRICT COURT

for the

District of Utah, Central Division

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff

v.

MANAGEMENT SOLUTIONS, INC, a Texas Corporation; WENDELL A. JACOBSON; ALLEN R. JACOBSON,

Defendants

Civil Action No. 2:11-cv-01165-BSJ

Judge Bruce S. Jenkins

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS AND TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Deloitte Financial Advisory Services, LLP c/o CORPORATION SERVICE COMPANY 2180 SOUTH 1300 EAST STE 650, SALT LAKE CITY, UTAH 84106

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material:

See Exhibit "A" attached hereto

Table with 2 columns: Place (Hill Johnson & Schmutz, 4844 North 300 West, Suite 300, Provo, UT 84604) and Date and Time (February 14, 2013)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization that is not a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

See Exhibit "B" attached hereto.

Table with 2 columns: Place (Hill Johnson & Schmutz, 4844 North 300 West, Suite 300, Provo, UT 84604) and Date and Time (February 13-14, 2013 - 9:00 a.m.)

The provisions of Fed. R. Civ. P. 45(c), relating to your protection as a person subject to a subpoena, and Rule 45 (d) and (e), relating to your duty to respond to this subpoena and the potential consequences of not doing so, are attached.

Date: 02-01-2013

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk

Stephen E. Quesenberry Attorney's signature

The name, address, e-mail, and telephone number of the attorney representing (name of party) Wendell A. Jacobson, who issues or requests this subpoena, are:

Stephen B. Quesenberry, 4844 N. 300 West, Suite 300, Provo, Utah 84604; squesenberry@hislaw.com; Telephone: 801-375-6600

AO 88B (Rev. 06/09) Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action (Page 2)

Civil Action No. 2:11-cv-001165-BSJ

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

This subpoena for *(name of individual and title, if any)* Deloitte Financial Advisory Services, LLP
was received by me on *(date)* _____

I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____ ; or

I returned the subpoena unexecuted because: _____

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Federal Rule of Civil Procedure 45 (c), (d), and (e) (Effective 12/1/07)

(c) Protecting a Person Subject to a Subpoena.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney’s fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the issuing court must quash or modify a subpoena that:

(i) fails to allow a reasonable time to comply;

(ii) requires a person who is neither a party nor a party’s officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;

(iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or

(iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the

subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information;

(ii) disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party; or

(iii) a person who is neither a party nor a party’s officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

(i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and

(ii) ensures that the subpoenaed person will be reasonably compensated.

(d) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.*

These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed

information under a claim that it is privileged or subject to protection as trial-preparation material must:

(i) expressly make the claim; and

(ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) Contempt. The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty's failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

EXHIBIT "A"

Definitions

As used below, the following terms are defined as follows:

A. The terms "you," "your," or "yours" shall mean and refer to Deloitte Financial Advisory Services, LLP, including your agents, attorneys, employees, partners, and representatives.

B. The terms "document" and "documents" shall mean and refer to anything that may be considered a document, **electronically stored information**, or tangible thing within the meaning of Rule 34 of the Federal Rules of Civil Procedure. This definition includes, but is not limited to any and all writings, drawings, graphs, charts, recordings, photographs and other records or data compilations from which information can be obtained, including originals and duplicates. To illustrate, "documents" include, but are not limited to, memoranda, communications, letters, written materials, reports, records, personal calendars and diaries, minutes, contracts, memoranda or electronic recordings of telephonic or personal communications, tape recordings, films, prints, negatives, stenographic notes, maps, drawings, plans, schematics, blueprints, sketches, email communications, documents evidencing payment, intraoffice and interoffice memoranda, memoranda for file, computer printouts, and data stored on computers, any computer network, computer servers, PDAs, smartphones, or other electronic devices.

C. The terms "communication" or "communications" shall mean and broadly include the transfer of information or thoughts in any form, including without limitation any and all face-to-face conversations, telephone conversations, letters, emails, electronic transmissions, memoranda, summaries, audio tapes, video tapes, notes or other memorials of communications, meetings, or other occasions of joint and mutual presence, as well as the transfer of any document or information from one person to another.

D. The term "Beckstead" shall mean and refer to John A. Beckstead as Receiver for Management Solutions, Inc., Wendell A. Jacobson and Allen R. Jacobson, and any person employed by or representing him, including any attorney or employee of Holland & Hart LLP.

E. The term "Lawsuit" shall mean and refer to the lawsuit styled Securities and Exchange Commission v. Management Solutions, Inc., Wendell A. Jacobson and Allen R. Jacobson, Civil No. 2:11-cv-01165, currently pending the United States District Court in and for the District of Utah, Central Division.

F. The term "Commingling Report" shall mean and refer to the "Report to Receiver of Management Solutions, Inc. 'Commingling of Funds'" issued by you on November 2, 2012.

G. The term “Jacobson Enterprise” shall mean and refer to Management Solutions, Inc. and all other entities listed in Appendix A to the Commingling Report and any MSI Affiliated Entities as defined in the Commingling Report.

E. The conjunctives “and” and “or,” as used herein, shall be construed both conjunctively and disjunctively and each shall include the other wherever such dual construction will serve to bring within the scope of these document requests or deposition topics any information or documents that otherwise would not be brought within their scope.

Instructions

1. A request for the production of a document shall require production of the entire document and all drafts and non-identical copies and versions thereof. If any document is not produced in full, please state the reason or reasons it is not being produced in full, and describe with reasonable particularity those portions of the document that are not being produced.

2. Pursuant to Rule 45 of the Federal Rules of Civil Procedure, if any documents are withheld based upon a claim of privilege, work product, confidentiality, or any other grounds, with respect to each such document, you should state the specific claim expressly and support your claim by a description of the nature of the document or things not produced that is sufficient to enable Wendell A. Jacobson to contest the claim.

DOCUMENTS TO BE PRODUCED

1. Every documents evidencing any investigatory procedure undertaken by you in connection with or in any way related to the Lawsuit;
2. Every document evidencing any communication with Beckstead for the period November 1, 2011 through the present;
3. Every document you generated or prepared in response to any request by Beckstead that is in any way related to the Lawsuit.
4. All bills or invoices sent by you to Beckstead for work undertaken or performed by you in connection with the Lawsuit.
5. All reports, analyses, work papers, studies or evaluations relating to the amount of revenues or profits generated from the underlying Jacobson Enterprise for all or any part of the period 1996 to 2011.
6. All reports, analyses, work papers, studies or evaluations relating to the amount of obligations owing to investors by the Jacobson Enterprise for any or all of the period

1996 through 2011, including all promissory notes given or received by any individual or entity within the Jacobson Enterprise.

7. All reports, analyses, work papers, studies or evaluations relating to any insolvency analysis of the Jacobson Enterprise for all or any part of the period 1996 to 2011, including, without limitation, every document that attempts to analyze or determine when revenues from the Jacobson Enterprise's underlying business operations became insufficient to meet its payment obligations to existing creditors and any document or summary which attempts to analyze or determine the point in time when the Jacobson Enterprise would have been unable to continue to operate without new investor funds.
8. Other than the Commingling Report, any reports, work papers, summaries, analyses, studies or evaluations generated by you analyzing the financial position of the Jacobson Enterprise for all or part of the period of 1996 to 2011, including without limitation, its business operations, debt obligations, investor obligations and cash flow.
9. All reports, analyses, work papers, studies or evaluations relating to or regarding the number and amount of payments made by the Jacobson Enterprise other than for investment into real estate and when and for what purpose such payments were made.
10. Copies of all documents relating to any properties owned or managed by the Jacobson Enterprise in the state of Tennessee.
11. Copies of QuickBooks files relating to all Jacobson Entities for all or any part of the period from 1996 through 2011, specifically to include files for October, November, and December of 2011.
12. A list, with all contact information, of all parties, individuals, or entities, considered to be investors in or partners with the Jacobson Enterprise or any sub part thereof.
13. Tax returns for all individuals and entities comprising the Jacobson Enterprise for the years 2010, 2011, and, to the extent possible, 2012.
14. All loan closing documents for any commercial or private loan entered into by the Jacobson Enterprise or any individual or entity comprising the Jacobson Enterprise for the period of 1996 to 2011.
15. The name and contact information for all individuals or entities which have performed accounting, tax preparation, or other financial analyses for the Receiver.

EXHIBIT "B"

Definitions

Terms used below that are defined in Exhibit "A" to this subpoena shall have the same meaning that they have in Exhibit "A."

DEPOSITION TOPICS

- (1) The contents of all documents requested in connection with Exhibit "A" to this Subpoena.
- (2) The contents of all documents produced in connection with Exhibit "A" to this Subpoena.
- (3) Any communication with Beckstead.
- (4) Any reports, analyses, work papers, studies or evaluations relating to the amount of obligations owing to investors by the Jacobson Enterprise for any or all of the period 1996 through 2011.
- (5) Any reports, analyses, work papers, studies or evaluations relating to any insolvency analysis of the Jacobson Enterprise for all or any part of the period 1996 to 2011, including, without limitation, every attempt to analyze or determine when revenues from the Jacobson Enterprise's underlying business operations became insufficient to meet its payment obligations to existing creditors and any document or summary which attempts to analyze or determine the point in time when the Jacobson Enterprise would have unable to continue to operate without new investor funds.
- (6) Any reports, work papers, summaries, analyses, studies or evaluations generated by you analyzing the financial position of the Jacobson Enterprise for all or part of the period of 1996 to 2011, including without limitation, its business operations, debt obligations, investor obligations and cash flow.
- (7) Any reports, analyses, work papers, studies or evaluations relating to or regarding the number and amount of payments made by the Jacobson Enterprise other than for investment into real estate and when and for what purpose such payments were made
- (8) Any investigatory procedures undertaken by you in connection with the Lawsuit or at the request of Beckstead.