

COUNTY OF BASTROP ET AL	CAUSE NO. 9842	
PLAINTIFF	§	IN THE 21 <sup>ST</sup>
	§	
V.	§	JUDICIAL
	§	
WILLIAM MICHAEL JOHNSON	§	DISTRICT COURT
DEFENDANT	§	BASTROP COUNTY, TEXAS

---

**DEFENDANT’S REQUEST FOR PRODUCTION TO PLAINTIFF**

TO: Plaintiff **COUNTY OF BASTROP ET AL**, c/o alleged attorney of record one Lee Gordon, alleged State Bar #08212500; and MCCREARY, VESELKA, BRAGG & ALLEN, P.C.;

Pursuant to Rules 193 and 196 of the Texas Rules of Civil Procedure, the man William Michael Johnson, defendant herein, requests that you produce certain documents, tangible things, recordings and other data compilations from which information can be obtained or translated, if necessary, into reasonable, usable forms, which are in the possession, custody or control of you, your agents, servants or attorneys. You must make a written response to each Request that states that the materials will be produced as requested, and that you will comply with this Request, except to the extent that you object, and state the specific reasons for your objections. Your written responses are to be served and the requested items are to be produced no later than thirty (30) standard calendar days from the date you receive these Requests and prior to any hearing and no less than thirty (30) standard calendar days prior to trial. Written responses and requested items are to be served to William Michael Johnson, care of Post Office Box 366, McDade, Texas uSA 78650. Certified copies will be sufficient with the originals expected to be produced for inspection at any hearing and at trial.

In responding to the following Requests for Production, you should furnish all information and items within your possession, custody or control, including information in the possession, custody or control of your employees, agents, attorney, or investigators, and all persons acting in your behalf and not merely such information within your personal knowledge.

The following terms are defined as follows:

1. "PLAINTIFF" when used refers to the named "COUNTY OF BASTROP ET AL" and its agents, attorneys, representatives, predecessors, successors, heirs and assigns.
2. "YOU" or "YOUR" when used refers to "COUNTY OF BASTROP" ET AL, its respective agents, attorneys, representatives, predecessors, successors, heirs and assigns.
3. "DEFENDANT", "defendant" or "Defendant" when used refers to the man William Michael Johnson, his respective agents, attorneys, representatives, predecessors, successors, heirs and assigns.

4. "IDENTIFY" or "IDENTITY":

For purposes of this specific request

(a) When used in reference to a natural person or persons, means to state his or her present or last known address, business and home telephone number (including area code), title or position and place of employment.

(b) When used in reference to a governmental or business entity, means to state its present or last known mailing address, state of incorporation, if any, Employer Identification Number (EIN) or Taxpayer Identification number (TIN) or both, area code and telephone number, and names and titles of persons with proper authority within the entity who may be contacted regarding this cause of action.

(c) If referring to documents, means to state with respect thereto its date, author or signer, addressee, type of document, all other information with sufficient particularity to enable it to be identified, its present or last known location, its custodian or custodians, and all persons to whom the document or a copy thereof was distributed. If any document is claimed to be privileged, the privilege claimed and the grounds therefore should be stated.

5. "DOCUMENT" or "RECORD" shall mean writings of every kind, source, and authorship, both originals and all non-identical copies thereof, in your possession, custody, or control, or known by you to exist, irrespective of whether the writing is one intended for or transmitted internally by you, or intended for or transmitted to any other person or entity, including without limitation, any government agency, department, administrative entity, or personnel. The term shall include handwritten, typewritten, printed, photocopied, photographic, or recorded matter. It shall include communications in words, symbols, pictures, sound recordings, films, tapes, and information stored in, or accessible through, computer or other information storage or retrieval systems, together with the codes and/or programming instructions and other materials necessary to understand and use such systems. For purposes of illustration and not limitation, the terms shall include: correspondence; transcripts of testimony; letters; notes; reports; papers; files; books; records; contracts; agreements; telegrams; teletypes and other communications sent or received; diaries; calendars; logs; notes or memoranda of telephonic or face-to-face conversations; drafts; work papers; agendas; bulletins; notices; circulars; announcements; instructions; schedules; minutes, summaries, and other records and recordings of any conferences, meetings, visits, statements, interviews, or telephone conversations; bills, statements, and other records of obligations and expenditures; canceled checks, vouchers, receipts, and other records of payments; ledgers, journals, balance sheets, profit and loss statements, and other sources of financial data; analyses; statements; interviews; affidavits; printed matter

(including published books, articles, speeches, and newspaper clippings); press releases; charts; drawings; maps; plats; specification manuals; brochures; parts lists; memoranda of all kinds to and from any persons, agencies, or entities; technical and engineering reports, evaluations, advice, recommendations, commentaries, conclusions, studies, test plans, manuals, procedures, data reports, results, and conclusions; records of administrative, technical, and financial actions taken or recommended; and all other writings the contents of which relate to, discuss, consider, or otherwise refer to the subject matter of the particular discovery requested.

If any document requested to be identified was but is no longer in existence, state whether it is:

- 1.) Missing or lost,
  - 2.) Destroyed,
  - 3.) Transferred voluntarily or involuntarily to others, and, if so, to whom, or
  - 4.) Otherwise disposed of; and in each instance explain the circumstances surrounding and authorization of such disposition thereof, state the appropriate date thereof and describe its contents.
6. "REFER(S) TO", "Relate(S) To", "Relating To", "Pertain(S) To" and "Pertaining To" shall mean referring to, referred to, comprising, comprised of, alluding to, responding to, connected with, commenting on, in respect of, about, regarding, discussing, showing, deciding, mentioning, reflecting, analyzing, constituting, evidencing, and all other words of similar import. These terms include documents, things and information that may support, sustain, refute and/or contradict an allegation and/or defense in the matter at hand.
7. "INCIDENT(S)" shall mean the events and occurrences comprising, relating to or stemming from your claims and allegations asserted in this lawsuit.
8. "PERSON" includes the plural, as well as the singular, and means any natural person or individual - when identified as such, or association, business organization, partnership, corporation (parent, subsidiary or affiliate), governmental organization, or formal or informal group, subdivision or affiliate thereof.
9. Plural words include their singular equivalent; singular words include their plural equivalent.
10. "AND" and "OR" shall be construed either conjunctively or disjunctively as required by the context to bring within the scope of these requests any document that might be deemed outside its scope by another construction.
11. "COMMUNICATION" shall mean and include every manner or means of transmitting, disclosure, transfer, or exchange, and every form of transmission, disclosure, transfer or exchange of information, whether

orally, electronically, or by document and whether face-to-face, by telephone, mail, personal delivery, by computer or otherwise.

12. "STATEMENT" shall mean and include any written or graphic statement signed or otherwise adopted or approved by the user in making it, and stenographic, mechanical, electrical or other recording or transcription thereof which is a substantially verbatim recital of an oral statement by the person making it and contemporaneously recorded.
13. "DESCRIBE IN DETAIL" shall mean to give a complete, accurate and full description concerning the matter about which inquiry is made, including the full name, address and telephone number of persons involved, if appropriate, along with dates, times, places, amounts and other particulars which make the answer to the interrogatory fair and meaningful.
14. "COMPLAINT" when used refers to your Original Complaint / Petition / Citation on file with the papers in this lawsuit, and any amendment thereto.
15. "NOTE" when used shall refer to any written promise by one party to pay money to another party or to bearer which relates to this lawsuit, including but not limited to any: promissory note, loan agreement, collateral note, joint note, installment note, demand note, executed note, mortgage note, negotiable note, non-recourse note, recourse note, renewal note, sale note, secured note, or unsecured note.
16. Each request for production of documents is to be deemed a continuing one. If, after serving an answer to any request for an admission, you obtain or become aware of any further information pertaining to that requested production of documents, you are requested to serve a supplemental answer setting forth such information.

### **REQUESTS FOR PRODUCTION**

1. Produce any and all written or recorded statements or reports in the care, custody or control of you or any of your agents or representatives obtained from any person having knowledge of facts taken prior to the filing of this lawsuit.
2. Produce all writings, drawings, graphs, charts, photographs, or other tangible items of any kind intended to be used by you as exhibits at the trial of this case.
3. Produce all writings, drawings, graphs, charts, photographs, or other tangible items of any kind

that you intend to admit as evidence at the trial of this case.

4. Produce all letters or correspondence between the Defendant and Plaintiff.

5. Produce a copy of all letters or correspondence between you and any other person or entities relating to the conduct and incidents made the basis of this lawsuit.

6, Produce copies of any and all telephone message slips, notes, or other correspondence reflecting oral and/or telephone conversations between you and any other person or entity relating to the conduct and incidents made the basis of this lawsuit.

7. Produce copies of all expert reports which in any way relate to this lawsuit. If such reports are not in writing, but were given verbally, Defendant requests that the reports be reduced to writing and provided to Defendant.

8. Produce copies of all statements and/or admissions you contend were made by any past or present employee or agent of Defendant or any other person acting on behalf of Defendant.

9. Produce any and all reports, publications, or other documents evidencing any standards, laws, regulations, or industry standards which you contend Defendant violated with respect to the subject matter of this lawsuit.

10. Produce all documents which form the basis of your contention that Defendant, or any of his representatives, agents or employees, is / are responsible for the injuries and / or damages allegedly sustained by you.

11. Produce all documents that reflect, refer or relate to monies received by you from any source which relate to the incidents, conduct, injuries or claims involved in this lawsuit.

12. Produce all documents that reflect, refer or relate to monies paid by you to any person or entity which relates to the incidents, conduct, injuries or claims involved in this lawsuit.

13. Produce all documents that reflect, refer or relate to your costs associated with your pursuit of this lawsuit.

14. Produce all pleadings and other documents reflecting the nature of the claims and defenses, and the disposition of such claims, at issue in any lawsuit or other legal action in which you have been involved, either as a plaintiff or as a defendant, other than the above-styled lawsuit.

15. Produce all correspondence, reports and other records relating to any claim which you have made against any person or entity other than Defendant as a result of the incidents and conduct made the basis of this suit.

16. Produce all diaries, calendars or any other lists or notes kept by you which relate to the incidents or conduct made the basis of this suit or any injuries or damages allegedly sustained by you as a result of such incidents or conduct.

17. Produce copies of any and all written contracts, agreements, or understandings that you, or anyone on your behalf, entered into with Defendant, or anyone else, at any time concerning the property at issue including and not limited to anything that goes to show any monetary, propriety, or contractual interest in the property at issue.

18. Produce any and all records or documents pertaining to any economic losses allegedly sustained by you as a result, in whole or in part, of the conduct and incidents at issue in this lawsuit.

19. Produce copies of any and all documents supporting your contention that Defendant breached any contract or other obligations in connection with or in the course of handling the incidents, conduct, injuries and claims at issue in this lawsuit, as may be alleged in your Complaint.

20. Produce all documents signed by Defendant or any alleged representative, agent or employee of Defendant prior to the institution of this suit.

21. Produce copies of any and all documents evidencing any conduct, action, and/or omission allegedly committed by Defendant and relevant to your claims in this lawsuit.

22. Produce all correspondence and unprivileged documents between you and any entity or person concerning any of the events, incidents, conduct or alleged damages which form the basis of any of the claims asserted by you in this lawsuit.

23. Produce all documents you received from or gave to Defendant concerning or relating to any of the damages, conditions, or events giving rise to or made the basis of the claims being made by you in this lawsuit.

24. Produce copies of all documents supporting any claim for damages you contend were caused by the actions and/or omissions of Defendant.

25. Produce copies of any and all documents reflecting, evidencing, or comprising any Note **or any other manner of promise or undertaking as may be** at issue in this lawsuit.

26. If not previously produced in response to the foregoing requests for production, produce copies of all documents upon which you rely in support of your contention that Defendant committed any wrongdoing or improper act or omission that has harmed you in any way.

27. Copy, front and back, of the contract for services which the alleged COUNTY OF BASTROP ET AL has with one Lee Gordon, alleged State Bar #08212500 and MCCREARY, VESELKA, BRAGG & ALLEN, P.C..

28. All pages front and back of alleged COUNTY OF BASTROP's corporate charter.

29. Pursuant to the Fair Debt Collection Practices Act (FDCPA) a verification of the alleged debt / liability – to include and not limited to any rendering forms, assessment forms and the like.

30. Any other manner of thing that will go to responsively address each and every thing as said to be wanting in Defendant's answer not already covered by this request.

Respectfully submitted,

by: \_\_\_\_\_  
William Michael Johnson, unrepresented  
c/o Post Office Box 366  
McDade, Bastrop county Texas uSA  
512-273-2396

**CERTIFICATE OF SERVICE**

"I hereby certify that a true and correct copy of the foregoing was by my hand delivered on May \_\_\_\_\_, 2007 to **Lee Gordon**, alleged State Bar #08212500, MCCREARY, VESELKA, BRAGG & ALLEN, P.C.; P.O. Box 26990, Austin, Texas 78755 via prepaid USPS Certified Mail, Article # 7005 1820 0007 0735 6964 Domestic Return Receipt PS Form 3811 used."

\_\_\_\_\_  
William Michael Johnson, unrepresented  
McDade, Bastrop county Texas uSA





# Track & Confirm

## Search Results

Label/Receipt Number: 7005 1820 0007 0735 6964

Detailed Results:

- Delivered, May 03, 2007, 7:29 am, AUSTIN, TX 78755
- Acceptance, May 01, 2007, 3:38 pm, ELGIN, TX 78621

### Track & Confirm

Enter Label/Receipt Number.

[< Back](#)

[Return to USPS.com Home >](#)

[Go >](#)

### Notification Options

#### Track & Confirm by email

Get current event information or updates for your item sent to you or others by email.

[Go >](#)



POSTAL INSPECTORS  
Preserving the Trust

[site map](#)

[contact us](#)

[government services](#)

[jobs](#)

[National & Premier Accounts](#)

Copyright © 1999-2004 USPS. All Rights Reserved. [Terms of Use](#) [Privacy Policy](#)

**SENDER: COMPLETE THIS SECTION**

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

**Lee Gordon, #08212500**  
**MCCREARY, VESELKA, BRAGG & ALLEN, P.O.**  
**P.O. Box 26990**  
**Austin, Texas 78755**

2. Article Number  
 (Transfer from service label) **7005 1820 0007 0735 6964**

PS Form 3811, August 2001

**COMPLETE THIS SECTION ON DELIVERY**

A. Signature  
 X

B. Received by (Printed Name)  
 Lee Gordon

C. Date of Delivery  
 May 03 2007

D. Is delivery address different from item 1?  Yes  
 If YES, enter delivery address below:  No

3. Service Type  
 Certified Mail  Express Mail  
 Registered  Return Receipt for Merchandise  
 Insured Mail  C.O.D.

4. Restricted Delivery? (Extra Fee)  Yes

102595-02-M-1035

"I hereby certify this image to be a true copy of the PS Form 3811 used for Article # 7005 1820 0007 0735 6964"  
 by *William-Michael Johnson*  
William-Michael Johnson, UCC, Bastrop County, Texas