REQUESTS

<u>Interrogatory #1</u>: Identify each individual you intend to call as a witness at any hearing or trial in this lawsuit.
Response:

<u>Jeffrey R. Helbig</u>
<u>Douglas N. Morgan, P.E.</u>

<u>Interrogatory #2</u>: Identify each individual you intend to call as an expert witness at any hearing or trial in this lawsuit.
Response:

<u>Jeffrey R. Helbig</u>
<u>Douglas N. Morgan, P.E.</u>

<u>Interrogatory #3</u>: For each individual identified in Interrogatories #1 and #2, state the subject matter upon which each individual is expected to testify.
Response:

<u>Jeffrey R. Helbig – Appraisal/Valuation</u>
<u>Douglas N. Morgan, P.E. – Engineering/Plans</u>

<u>Interrogatory #4</u>: Identify the individual who is your "head of the acquiring agency" as the term "head of the acquiring agency" is used in R.C. 163.01, *et seq*.
Response:

<u>Jack Marchbanks, Ph D, Director</u>

<u>Interrogatory #5</u>: Identify the individual who will serve as your party representative during this lawsuit.
Response:

<u>John R. Wooldridge, ODOT D5 REA</u>

<u>Interrogatory #6</u>: Identify each individual answering or assisting in the answering of the discovery requests contained herein.
Response:

<u>Justine A. Allen, AGO</u>
<u>John R. Wooldridge, ODOT</u>

<u>Interrogatory #7</u>: Identify each individual that you retained or consulted with as an expert but that you do not intend to call as an expert witness at any hearing or trial of this lawsuit.
Response:

<u>David Weber (VF-Appraiser)</u>

<u>Request for Production #1</u>: For each individual identified in Interrogatories #1, #2, #4, #5, #6, and #7, produce a complete and accurate copy of the individual's most recent resume or curriculum vitae (CV).
Response:

<u>#1 and #2 Produced</u>
<u>#4, #5, #6, and #7 N/A</u>

<u>Request for Production #2</u>: Produce a complete and accurate copy of all appraisals of the Subject Property, or other document valuing the Subject Property such as a value finding or value analysis, that are in your possession, custody, or control.
Response:

<u>Produced</u>

<u>Request for Production #3</u>: Produce a complete and accurate copy of your engagement agreement with Integra Realty Resources for the provision of an appraisal report concerning the Subject Property.
Response:

<u>N/A; IRR was a sub of HLS</u>

<u>Request for Production #4</u>: Produce a complete copy of all written instructions or notes that you provided to Integra Realty Resources in connection with their preparation and provision of an appraisal report concerning the Subject Property.
Response:

<u>N/A</u>

<u>Request for Production #5</u>: Produce a complete copy of the most recent set of project plans for the Project; including, but not limited to, engineering and construction drawings, right-of-way sheets, plan and profile sheets, property map sheets, cross section plans, plans showing sewer and utility locations before and after the Project, the relocation of any and all utilities as a result of the Project, and maintenance of traffic plan sheets.
Response:

<u>Produced all Plans and Drawings available</u>

Request for Production #6: Produce a complete copy of all cost estimates that were prepared in relation to right-of-way acquisition for the Project.
Response:

Produced

Request for Production #7: Produce a complete copy of all documents referred to, relied upon, or otherwise utilized in the answering the discovery requests contained herein.
Response:

Produced

Request for Production #8: Produce a complete copy of all documents, demonstratives, photographs, imagery, tangible items, or any other type of evidence that you intend to utilize as an exhibit at any hearing or the trial of this lawsuit.
Response:

Produced all applicable files from ODOT
Produced all evidence intended for use as of the date of this production

Respectfully submitted,

Goldman Braunstein Stahler Kenter LLP

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VERIFICATION