

CAUSE NO. D-1-GN-14-005114

JAMES STEELE, et al., <i>Plaintiffs,</i>	§	IN THE DISTRICT COURT OF
	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
GTECH CORPORATION, <i>Defendant.</i>	§	
	§	201 <sup>st</sup> JUDICIAL DISTRICT
	§	

**PLAINTIFFS' THIRD SET OF DISCOVERY TO DEFENDANT GTECH CORPORATION**

To: Defendant, GTECH Corporation, by and through its attorneys of record, Kenneth E. Broughton and Francisco Rivero, REED SMITH, LLP, 811 Main Street, Suite 1700, Houston, Texas 77002-6110.

Plaintiffs, JAMES STEELE, et al., serve these requests for production, on Defendant, as allowed by the Texas Rules of Civil Procedure. Defendant must produce all requested documents (as they are kept in the ordinary course of business or organized and labeled to correspond with categories in each request) for inspection and copying, not more than 30 days after service, at 3000 Wesleyan Street, Suite 380, Houston, Texas 77027.

Respectfully submitted,

**LAGARDE LAW FIRM, P.C.**



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**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause in accordance with Texas Rules of Civil Procedure on the 16<sup>th</sup> day of April, 2015.

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A handwritten signature in black ink, appearing to read "R. L. Lagarde". The signature is fluid and cursive, with the first name "Richard" and last name "Lagarde" clearly visible.

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RICHARD L. LAGARDE

## DEFINITIONS

These words and phrases have the following meanings unless the context requires otherwise:

- “Steele Lawsuit” -- means Cause No. D-1-GN-14-005114; James Steele, et al. vs. Gtech Corporation; In the 201st Judicial District Court of Travis County, Texas.
- “IGT”-- means International Game Technology, a Nevada Corporation.

1. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH Corporation and IGT that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

2. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH S.p.A and IGT that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

3. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH Corporation and GTECH S.p.A that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

4. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH Corporation and MacKenzie Partners, Inc. that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

5. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH S.p.A and MacKenzie Partners, Inc. that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

6. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH Corporation and Credit Suisse Securities (Europe) Limited that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

7. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH S.p.A and Credit Suisse Securities (Europe) Limited that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

8. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH Corporation and Morgan Stanley & Co. LLC that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**

9. **REQUEST FOR PRODUCTION:** Please produce a copy of all representations, warranties, disclosures, and/or communications of any type between GTECH S.p.A and Morgan Stanley & Co. LLC that refer to, relate to, or regard the Steele Lawsuit.

**RESPONSE:**