

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 DIISTRICT
	§	

**PLAINTIFFS' NOTICE OF DEPOSITION OF CORPORATE REPRESENTATIVE OF  
GTECH CORPORATION AND SUBPOENA DUCES TECUM**

TO: GTECH CORPORATION by and through its attorneys of record: Kenneth E. Broughton, Francisco Rivero, and Arturo Munoz, REED SMITH, LLP, 811 Main Street, Suite 1700, Houston, Texas 77002.

Please take notice that under the Texas Rules of Civil Procedure, Plaintiffs will take the deposition of a corporate representative of GTECH Corporation at the office of GTECH Corporation, 8200 Cameron Road #120, Austin, Texas 78754 on **July 16, 2015 at 9:30 a.m.** The deposition will be recorded stenographically. The stenographic recording will be conducted by U.S. Legal Support, 701 Brazos Street, Austin, Texas 78701, Tel. 512-292-4249.

GTECH Corporation should designate one or more persons to testify about the following topics:

- (1) All efforts made by GTECH to locate and produce items responsive to the requests for production in Exhibits A, B, C, & D;
- (2) The identity of and job description for the person(s) responsible for searching for the items responsive to the requests for production in Exhibits A, B, C, & D;
- (3) The location where the items responsive to the requests for production in Exhibits A, B, C, & D are stored;

- (4) Whether any additional items responsive to the requests for production in Exhibits A, B, C, & D are in existence but have not yet been located;
- (5) Whether any additional items responsive to the requests for production in Exhibits A, B, C, & D have been located but have not yet been produced; and,
- (6) Whether any additional items responsive to the requests for production in Exhibits A, B, C, & D are no longer in existence and the reasons why they are no longer in existence.

**SUBPOENA DUCES TECUM**

Additionally, GTECH Corporation should produce at the corporate representative's deposition the items responsive to the requests for production in Exhibits A, B, C, & D that have not yet been produced.

Respectfully submitted,

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



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**CO-COUNSEL FOR PLAINTIFFS**

**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 23<sup>rd</sup> day of April, 2015.

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YARBROUGH AND CLARK**

A handwritten signature in black ink, appearing to read "R. L. Lagarde". The signature is written in a cursive style with a large initial "R" and a long, sweeping underline.

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RICHARD L. LAGARDE

<p><b>JAMES STEELE, et al.</b> <i>Plaintiffs,</i></p> <p><b>V.</b></p> <p><b>GTECH CORPORATION,</b> <i>Defendant.</i></p>	<p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p> <p>§</p>	<p><b>IN THE DISTRICT COURT OF</b></p> <p><b>TRAVIS COUNTY, TEXAS</b></p> <p><b>201<sup>ST</sup> JUDICIAL DISTRICT</b></p>
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**PLAINTIFFS’ FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

To: Defendant, GTECH Corporation, by and through its registered agent, Corporation Service Company, 211 E. 7<sup>th</sup> Street, Suite 620, Austin, Texas 78701.

Plaintiffs, JAMES STEELE, et al. serve these requests for production on Defendant, as allowed by Texas Rule of Civil Procedure 196. 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 50 days after service, at the offices of Plaintiffs’ counsel, LaGarde Law Firm, P.C., 3000 Wesleyan Street, Suite 380, Houston, Texas 77027.

Respectfully submitted,

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



---

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**COUNSEL FOR PETITIONER**

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**CO-COUNSEL FOR PETITIONER**

**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 18th day of December, 2014.

**Via Hand Delivery**

GTECH Corporation  
Corporation Service Company  
211 E. 7<sup>th</sup> Street, Suite 620  
Austin, Texas 78701

†

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RICHARD L. LAGARDE



## INSTRUCTIONS

For any requested information about a document that no longer exists or cannot be located, identify the document, state how and when it passed out of existence or when it could no longer be located, and give the reasons for the disappearance. Also, identify each person having knowledge about the disposition or loss, and identify each document evidencing the existence or nonexistence of each document that cannot be located.

## DEFINITIONS

The following definitions shall have the following meanings, unless the context requires otherwise:

1. "Plaintiff" or "defendant," as well as a party's full or abbreviated name or a pronoun referring to a party, means the party, and when applicable, the party's agents, representatives, officers, directors, employees, partners, corporate agents, subsidiaries, affiliates, or any other person acting in concert with the party or under the party's control, whether directly or indirectly, including any attorney.
2. "You" or "your" means Defendant, GTECH CORPORATION, your successors, predecessors, divisions, subsidiaries, present and former officers, agents, employees, and all other persons acting on behalf of Defendant or their successors, predecessors, divisions, and subsidiaries.
3. "Communication" means any disclosure, transfer, or exchange of information or opinion, however made.
4. "Document" means all written, typed, or printed matter and all magnetic, electronic, or other records or documentation of any kind or description in your actual possession, custody, or control, including those in the possession, custody, or control of any and all present or former directors, officers, employees, consultants, accountants, attorneys, or other agents, whether or not prepared by you, that constitute or contain matters relevant to the subject matter of the action. "Document" includes, but is not limited to, the following: letters, reports, charts, diagrams, correspondence, telegrams, memoranda, notes, records, minutes, contracts, agreements, records or notations of telephone or personal conversations or conferences, interoffice communications, e-mail, microfilm, bulletins, circulars, pamphlets, photographs, faxes, invoices, tape recordings, computer printouts, drafts, résumés, logs, and worksheets.

5. "Electronic or magnetic data" means electronic information that is stored in a medium from which it can be retrieved and examined. The term refers to the original (or identical duplicate when the original is not available) and any other copies of the data that may have attached comments, notes, marks, or highlighting of any kind. Electronic or magnetic data includes, but is not limited to, the following: computer programs; operating systems; computer activity logs; programming notes or instructions; e-mail receipts, messages, or transmissions; output resulting from the use of any software program, including word-processing documents, spreadsheets, database files, charts, graphs, and outlines; metadata; PIF and PDF files; batch files; deleted files; temporary files; Internet- or web-browser-generated information stored in textual, graphical, or audio format, including history files, caches, and cookies; {continue listing examples as necessary}; and any miscellaneous files or file fragments. Electronic or magnetic data includes any items stored on magnetic, optical, digital, or other electronic-storage media, such as hard drives, floppy disks, CD-ROMs, DVDs, tapes, smart cards, integrated-circuit cards (e.g., SIM cards), removable media (e.g., Zip drives, Jaz cartridges), microfiche, punched cards, etc. Electronic or magnetic data also includes the file, folder, tabs, containers, and labels attached to or associated with any physical storage device with each original or copy.
6. "Fun 5's" refers to the scratch-off game referred to by the Texas Lottery as Instant Game # 1592.
7. "Possession, custody, or control" of an item means that the person either has physical possession of the item or has a right to possession equal or superior to that of the person who has physical possession of the item.
8. "Person" means any natural person, corporation, firm, association, partnership, joint venture, proprietorship, governmental body, or any other organization, business, or legal entity, and all predecessors or successors in interest.
9. "Mobile device" means any cellular telephone, satellite telephone, pager, personal digital assistant, handheld computer, electronic rolodex, walkie-talkie, or any combination of these devices.
10. "Non-privileged" means documents not protected by the attorney-client privilege or the attorney work-product privilege as those privileges are currently defined by Texas law.
11. "Contract" means an oral or written agreement.
12. "Identify" or "describe," when referring to a person, means you must state the following:

- a. The full name.
  - b. The present or last known residential address and residential telephone number.
  - c. The present or last known office address and office telephone number.
  - d. The occupation, job title, employer, and employer's address at the time of the event or period referred to in each particular interrogatory.
  - e. In the case of any entity, identify the officer, employee, or agent most closely connected with the subject matter of the interrogatory and the officer who is responsible for supervising that officer or employee.
13. "Identify" or "describe," when referring to a document, means you must state the following:
- a. The nature of the document (e.g., letter, handwritten note).
  - b. The title or heading that appears on the document.
  - c. The date of the document and the date of each addendum, supplement, or other addition or change.
  - d. The identities of the author, signer of the document, and person on whose behalf or at whose request or direction the document was prepared or delivered.
  - e. The present location of the document and the name, address, position or title, and telephone number of the person or persons having custody of the document.

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

1. Produce all Contracts in effect between September 1, 2013, and the present, which governed your relationship with the Texas Lottery Commission.
2. Produce all Contracts in effect between September 1, 2013, and the present, which governed the relationship between you and the parties responsible for designing Instant Game No. 1592.
3. Produce all Contracts in effect between September 1, 2013, and the present, which governed the relationship between you and the parties responsible for printing the scratch-off tickets for Instant Game No. 1592.
4. Produce all Contracts in effect between September 1, 2013, and the present, which governed the relationship between you and the parties responsible for producing the validation program for the scratch-off tickets for Instant Game No. 1592.
5. Produce all non-privileged Documents that relate to, refer to, or reflect Communications between you and the Texas Lottery Commission regarding Instant Game No. 1592.
6. Produce all non-privileged Documents that relate to, refer to, or reflect Communications between you and scratch-off ticket vendors regarding Instant Game No. 1592.
7. Produce all non-privileged Documents that relate to, refer to, or reflect Communications between you and persons or entities other than the Texas Lottery Commission regarding Instant Game No. 1592.
8. Produce all non-privileged Documents that relate to, refer to, or reflect Communications internal to GTECH Corporation regarding Instant Game No. 1592.

9. Produce an exemplar copy of each scratch-off ticket produced by, designed by, printed by, or sold by GTECH Corporation in Texas that contains language identical to or substantially similar to the language contained in the instructions for Game 5 of the Fun 5's game.
10. Produce an exemplar copy of each scratch-off ticket produced by, designed by, printed by, or sold by GTECH Corporation in states other than Texas that contains language identical to or substantially similar to the language contained in the instructions for Game 5 of the Fun 5's game.
11. If you contend that the second sentence in the instructions for Game 5 of the Fun 5's game simply describes the chance to multiply the prize already won under the first sentence, produce an exemplar copy of each scratch-off ticket produced by, designed by, printed by, or sold by GTECH Corporation in Texas that contains language describing the chance to multiply a prize already won by the holder of the scratch-off ticket.
12. If you contend that the second sentence in the instructions for Game 5 of the Fun 5's game simply describes the chance to multiply the prize already won under the first sentence, produce an exemplar copy of each scratch-off ticket produced by, designed by, printed by, or sold by GTECH Corporation in states other than Texas that contains language describing the chance to multiply a prize already won by the holder of the scratch-off ticket.
13. Produce all non-privileged Documents that relate to, refer to, or reflect the regulations for Instant Game No. 1592, including any drafts of said regulations.

14. Produce all non-privileged Documents that relate to, refer to, or reflect the language appearing on the Fun 5's scratch-off ticket, including any drafts of said language.
15. Produce all non-privileged Documents that relate to, refer to, or reflect the instructions for Game 5 of the Fun 5's scratch-off game, including any drafts of said instructions.
16. Produce all non-privileged Documents that relate to, refer to, or reflect what GTECH Corporation contends was meant by the language of the instructions for Game 5 of the Fun 5's Game.
17. Produce all non-privileged Documents that relate to, refer to, or reflect what GTECH Corporation contends was meant by the language contained in the official game regulations for Game 5 of Instant Game No. 1592.
18. Produce all non-privileged Documents that relate to, refer to, or reflect whether alternative language was considered for the language contained in the official game regulations for Instant Game No. 1592.
19. Produce all non-privileged Documents that relate to, refer to, or reflect whether alternative language was considered for the instructions for Game 5 printed on the Fun 5's tickets.
20. Produce all non-privileged Documents that relate to, refer to, or reflect whether any attempts were made to determine whether reasonable minds might differ as to the meaning of the instructions for Game 5 of the Fun 5's game.
21. Produce all non-privileged Documents that relate to, refer to, or reflect concern that there may be the potential for confusion regarding the meaning of the instructions for Game 5 of the Fun 5's game.

22. Produce all non-privileged Documents that relate to, refer to, or reflect complaints regarding Game 5 of the Fun 5's game.
23. Produce all non-privileged Documents that relate to, refer to, or reflect inquiries regarding the meaning of the instructions for Game 5 of the Fun 5's game.
24. Produce all non-privileged Documents that relate to, refer to, or reflect Communications between Texas legislators and the Texas Lottery Commission regarding the Fun 5's game.
25. Produce all non-privileged Documents that relate to, refer to, or reflect Communications between Texas legislators and GTECH regarding the Fun 5's game.
26. Produce all non-privileged Documents that relate to, refer to, or reflect Communications regarding the closing of Instant Game No. 1592.
27. Produce a copy of the Texas Lottery Commission Lottery Operations Division Procedure LO-PD-018 effective March 29, 2012.
28. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect drafts of the Working Papers for Game No. 1592.
29. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect comments, questions, or changes made by the staff of the Texas Lottery Commission to drafts of the Working Papers for Game No. 1592.
30. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect the Final Working Papers for Game No. 1592.
31. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect the Executed Final Working Papers for Game No. 1592.

32. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect instructions given to the person who (or entity that) prepared the computer validation program for Game No. 1592 which describe under what circumstances a ticket should be declared a winning ticket under the first and second sentences of the instructions for Game 5 of the Fun 5's game. This request is meant to include any "If-Then" or If-Then-Else" instructions provided for Game 5 of Instant Game No. 1592.
33. Produce any organizational charts for GTECH Corporation that were in effect from September 1, 2013, to the present.
34. Produce any proposals for Game No. 1592 provided by GTECH Corporation to the Texas Lottery Commission.
35. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect the development of Game No. 1592.
36. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect the design of Game No. 1592.
37. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect the design of the scratch-off Fun 5's tickets for Game No. 1592.
38. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect testing of Game No. 1592.
39. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect approval by GTECH of Game No. 1592.
40. Produce a copy of all non-privileged Documents that relate to, refer to, or reflect approval by the Texas Lottery Commission of Game No. 1592.



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' SECOND 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 interrogatories, requests for production, and requests for admission on Defendant, as allowed by Texas Rules of Civil Procedure 197, 196, and 198. Defendant must answer each interrogatory separately, fully, in writing, and under oath, within 30 days of service. Defendant must also 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. Finally, Defendant must admit or deny each request for admission, in writing, within 30 days after service.

Respectfully submitted,

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



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**CO-COUNSEL FOR PLAINTIFFS**

**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 24<sup>th</sup> day of February, 2015.

**Via facsimile 713-469-3899**

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**COUNSEL FOR INTERVENORS,  
BOGHOSIAN, WILSON, AND BAMBICO**



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RICHARD L. LAGARDE

## DEFINITIONS

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

“Fun 5’s” - means Texas Lottery Instant Game Number 1592.

“Non-Winning Ticket” – means a Ticket which is not programmed to be a winning Ticket.

“Play Symbol” – means the printed data under the latex on the front of the Instant Ticket that is used to determine eligibility for a prize.

“Serial Number” - means a unique 14 (fourteen) digit number under the latex scratch-off covering on the front of the Fun 5’s Ticket.

“Ticket” – means a Texas Lottery “Fun 5’s” Instant Game No. 1592 Ticket.

1. **REQUEST FOR ADMISSION:** GTECH Corporation provided the Texas Lottery with the Serial Numbers of winning Tickets for the “Fun 5’s” game.

**RESPONSE:**

2. **REQUEST FOR ADMISSION:** GTECH Corporation provided the Texas Lottery with the Serial Numbers of Non-Winning Tickets for the “Fun 5’s” game.

**RESPONSE:**

3. **REQUEST FOR ADMISSION:** The Serial Numbers of Fun 5’s Tickets which reveal a “MONEY BAG” Play Symbol in Game 5 but do not also reveal three “5” Play Symbols in any one row, column, or diagonal do not correspond to the Serial Numbers of winning Tickets GTECH Corporation provided to the Texas Lottery.

**RESPONSE:**

4. **REQUEST FOR ADMISSION:** The Serial Numbers of Fun 5’s Tickets which reveal a “MONEY BAG” Play Symbol in Game 5 but do not also reveal three “5” Play Symbols in any one row, column, or diagonal do correspond to the Serial Numbers of Non-Winning Tickets GTECH Corporation provided to the Texas Lottery.

**RESPONSE:**

5. **INTERROGATORY:** If you have responded to any of the four preceding requests for admission with anything other than an unqualified “Admitted”, state in detail all the facts upon which you base your refusal to admit such request(s) and identify the name, address, and employer of the individuals who have knowledge of such facts.

**RESPONSE:**

6. **REQUEST FOR PRODUCTION:** If you have responded to any of the four preceding requests for admission with anything other than an unqualified “Admitted”, please produce a copy of all documents that refer to, relate to, or regard the facts upon which you base your refusal to admit such request(s).

**RESPONSE:**

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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**COUNSEL FOR PLAINTIFFS**

**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 distinguishable.

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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:**

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' FOURTH SET OF DISCOVERY TO DEFENDANT GTECH CORPORATION**

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

Plaintiffs, JAMES STEELE, et al., serve these interrogatories, requests for production, and requests for admission on Defendant, as allowed by Texas Rules of Civil Procedure 197, 196, and 198. Defendant must answer each interrogatory separately, fully, in writing, and under oath, within 30 days of service. Defendant must also 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. Finally, Defendant must admit or deny each request for admission, in writing, within 30 days after service.

Respectfully submitted,

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



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**CO-COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing document was sent to the following counsel of record in accordance with Texas Rule of Civil Procedure 21a on the this 20<sup>th</sup> day of April, 2015.

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YARBROUGH AND CLARK**

A handwritten signature in black ink, appearing to read "R. L. Lagarde". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

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RICHARD L. LAGARDE

**PLAINTIFFS' FOURTH SET OF DISCOVERY**

1. **REQUEST FOR ADMISSION:** The Texas Lottery Commission did not cause or contribute to causing the harm for which recovery of damages is sought by the Plaintiffs and Intervenors in this lawsuit.

**RESPONSE:**

2. **INTERROGATORY:** If you have responded to the preceding request for admission with anything other than an unqualified "Admitted", state in detail all the facts upon which you base your refusal to admit such request(s) and identify the name, address, and employer of the individuals who have knowledge of such facts.

**RESPONSE:**

3. **REQUEST FOR PRODUCTION:** If you have responded to the preceding request for admission with anything other than an unqualified "Admitted", please produce a copy of all documents that refer to, relate to, or regard the facts upon which you base your refusal to admit such request(s).

**RESPONSE:**