

VIRGINIA:

IN THE CIRCUIT COURT OF THE COUNTY OF FAIRFAX

_____)	
WORLD MISSION SOCIETY, CHURCH)	
OF GOD A NJ NONPROFIT)	
CORPORATION,)	
)	
Plaintiff,)	CASE NO.: 2011-17163
)	
vs.)	
)	
MICHELE COLON and)	
TYLER J. NEWTON)	
)	
Defendants.)	
_____)	

PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION
PROPOUNDED TO DEFENDANT TYLER J. NEWTON

COMES NOW Plaintiff, World Mission Society, Church of God a NJ Nonprofit Corporation ("Plaintiff"), by counsel Dozier Internet Law, P.C., and pursuant to Rules 4:9 and 4:9(A) of the Rules of the Supreme Court of Virginia, submits this Plaintiff's First Set of Requests for Production Propounded to Defendant Tyler J. Newton for responses within twenty-one (21) days as required by the Rules of the Supreme Court of Virginia:

DEFINITIONS AND INSTRUCTIONS

1. The term "document" or "documents" shall mean, without limitation, the original and any and all drafts and non-identical copies of all writings of any kind in your possession, custody or control, including, but not limited to, correspondence, scripts, records, reports, electronic mail, electronic mail attachments, web pages, external and internal memoranda, digital voice exchange transcripts or summaries, notes, letters, telegrams, telexes, messages (including, but not limited to, reports of telephone conversations, messages and conferences), studies,

analyses, books, magazines, newspapers, booklets, circulars, bulletins, instructions, minutes, other communications, questionnaires, surveys, contracts, memoranda of agreement, assignments, books of account orders, records of summaries of personal interviews of conversations, diaries, schedules, printouts, drawings, blueprints, specifications, graphs, studies, planning materials, statistical statements, forecasts, work papers, invoices, statements, receipts, income and other tax returns, bills, checks, bank books, bank statements, vouchers, notebooks, data sheets, photographs, microfilm, microfiche, photographic negatives, tapes, magnetic tapes, paper tapes, cassette tapes, videotapes, plotter output recordings, discs, data cards, films, data processing files, and other computer readable records or programs, breadboards, catalogues, brochures, all other written or printed matter of any kind, and all other compilations from which information can be obtained and translated if necessary. Any such document bearing on any page, thereof, any marks such as an initial, stamped indices, comments or notations or any character not part of the signed text or photographic reproduction thereof is to be considered and produced as a separate document.

2. The term “communication” shall mean every oral or written statement or conversation.

3. The pronouns “you” or “your” refer to the parties to whom this First Set of Requests for Production is addressed, their related entities, and any representatives, agents, servants, employees and others acting on their behalves.

4. If you assert as an objection to any of this First Set of Requests for Production that the documents sought are privileged, please state the privilege that you believe is involved, identifying each such privilege in connection with the specific Request for Production you assert seeks such privileged information. In accordance with the applicable rules, if you withhold any

document otherwise discoverable by claiming it is privileged or subject to protection as trial preparation material, you must make the claim expressly and describe the nature of the documents, communications or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable the Plaintiff to assess the applicability of the privilege or protection claimed.

5. Unless otherwise specified, when construing the scope of these Requests, the terms shall be given their most expansive and inclusive interpretations, including but not limited to:

- a. Construing the words “and” and “or” in the conjunctive or disjunctive as necessary to make the Request more inclusive;
- b. Construing the words “any” and “all” to mean “any and all” as necessary to make the Request more inclusive;
- c. Construing the past or present tenses of a verb to mean the present or past tenses of the verb, respectively, as necessary to make the Request more inclusive;
- d. Construing the singular forms of the word, respectively, as necessary to make the Request more inclusive; and
- e. Construing masculine or feminine pronouns to mean feminine or masculine pronouns, respectively, as necessary to make the Request more inclusive.

6. Your answers to these Requests must be supplemented, as necessary, in accordance with the Rules of the Supreme Court of Virginia.

REQUESTS

1. Produce all documents used in the preparation of or identified in your Answers to Plaintiff’s First Set of Interrogatories.

2. All electronically-stored information or data regarding, referring to, and addressing the “www.examinethewmscog.com” website, the claims raised in the Complaint, or the statements made and defenses raised in your Answer to Complaint.
3. Produce all materials and communications you sent to or received from any other individual or entity regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff at any time.
4. Produce all Internet postings made by you, in which you have been involved, or, to your knowledge, made by Michele Colon regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff at any time.
5. Provide your tax returns for each of the last ten years, including all forms and attachments.
6. Produce all documents received from third parties regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff through subpoena, informal request, or other means.
7. Produce all documents which you intend to introduce at trial.
8. Provide all documents addressing or pertaining to the facts and circumstances raised by Plaintiff’s Complaint or your Answer to Complaint.
9. Provide copies of all Internet postings which you or, to your knowledge, Michele Colon have posted to the Internet or otherwise used in communications with any individual or entity regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
10. Provide copies of all communications between you and Michele Colon regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you or Michele Colon to be associated with the Plaintiff.
11. Provide copies of any correspondence to or from each and every professional or expert with whom you have corresponded regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.

12. Provide copies of any correspondence to or from each and every witness you expect to call in this matter.
13. Provide any expert reports regarding the Plaintiff, the subject matter of this litigation including your defenses, or any individual or entity believed by you to be associated with the Plaintiff.
14. Provide any expert reports upon which you expect to rely in this matter.
15. Provide copies of documents regarding any legal claims or lawsuits filed by or against you in the last ten (10) years.
16. Provide all documents supporting or refuting, or otherwise stating the facts upon which you rely in support of your claim that Plaintiff engages in “harmful and abusive methods.”
17. Provide copies of any communications, including, but not limiting your response to letters, faxes, or emails, to or from anyone you claim to be a “victim” of the Plaintiff and any member of the “families” you claim to have been “administering” as a result of actions of the Plaintiff (*See Answer to Complaint* ¶27).
18. Provide a copy of all recordings in your possession regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
19. Provide copies of any recordings made by or with your involvement regarding the Plaintiff, the subject matter of this litigation, or any individual or entity believed by you to be associated with the Plaintiff.
20. Provide all documents supporting or refuting, or otherwise stating the facts upon which you rely in support of your claims that Plaintiff is engaged in what you call “questionable financial practices” and that “they totally have to be laundering money” (*See Answer to Complaint* ¶33).
21. Provide all documents supporting or refuting, or otherwise stating the facts upon which

you rely in support of each of the defenses raised in your Answer to Complaint.

22. Provide all documents showing any communications or other methods you have used to investigate the truth or falsity of your claims regarding Plaintiff, made directly or by denying in your Answer to Complaint having made any false statements, including, but not limited to, claims that the Plaintiff is a cult, uses harmful and abusive methods, is engaged in questionable financial practices, is laundering money, destroys marriages or families, uses mind control tactics, deceived the Points of Light Institute, uses fear and guilt as tactics, uses sleep deprivation, has a business relationship or financial connection to Big Shine Worldwide, Inc., or lied to the IRS.
23. Provide a complete copy of all documents which currently are posted to the www.examinethewmscog.com website or which were posted but subsequently removed, including any comments posted by site visitors.
24. Provide all documents regarding the ownership and administration of the www.examinethewmscog.com website, including, but not limiting your response to, documents regarding or reflecting purchase, ownership, administration, promotion, or advertising.
25. Provide copies of any admission or statement against interest made by the Plaintiff which you claim to be relevant to the claims or defenses in this matter.
26. Provide copies of any oral, written, or recorded statements taken by you or on your behalf in connection with the claims or defenses raised in this matter.

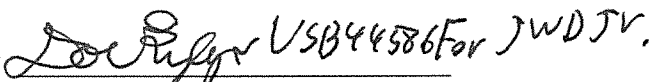
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27. Provide copies of any insurance agreements held by you that may be used to satisfy part or all of a judgment, if any, that may be entered in this action.

PLEASE BE ADVISED THAT YOU MAY BE REQUIRED TO SEASONABLY
SUPPLEMENT YOUR RESPONSES.

Dated: 4-16-12

WORLD MISSION SOCIETY,
CHURCH OF GOD A NJ NONPROFIT
CORPORATION

By:  USB44586 For JWD Jr.

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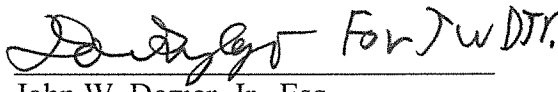
*Attorneys for Plaintiff
World Mission Society,
Church of God
a NJ Nonprofit Corporation*

CERTIFICATE OF SERVICE

I hereby certify that on this 18th day of April, 2012, the foregoing PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION PROPOUNDED TO DEFENDANT TYLER J.

NEWTON was transmitted to Lee E. Berlik, Esquire, Counsel for Defendants, via email to lberlik@berliklaw.com, facsimile to **(888) 772-0161**, and was deposited with the United States Postal Service as First Class Mail, postage prepaid, in an envelope addressed to:

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