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CODE 2610

John R. Clarkson, Esq.

1 4. Request to inspect and copy, test or sample any tangible things which constitute or
2 contain matters within the scope of Rule 26(b) and which are in the possession, custody or control of
3 Plaintiff.

4 5. Provide a written list of persons (other than expert witnesses or consultants) known or
5 reasonably believed by Defendant to have knowledge of any facts relevant to the allegations of any
6 pleading filed by Plaintiff or by Defendant, including persons having knowledge of rebuttal or
7 impeachment evidence. Each person must be identified by name and location, along with a general
8 description of the subject matter of the person's testimony.

9 6. Be prepared to propose a plan and schedule of discovery and make a reasonable effort
10 to agree to provide all discovery requested, with any conditions or limitations thereon;

11 7. Be prepared to discuss settlement of the action and the use of extrajudicial procedures
12 or alternative methods of dispute resolution to resolve the controversy;

13 8. Be prepared to discuss such other matters as may aid in the disposition of the case.

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CERTIFICATE OF MAILING

Pursuant to NRCP 5(b), I certify that I am employee of the Clarkson Law Office, Ltd., am over the age of 18 years, and that on the 20 day of April, 2001, I placed in an envelope, postage fully prepaid, and deposited for mailing in the United States Post Office at Reno, Nevada, a true copy of the *Notice of Case Conference (16.1)*, addressed as follows:

Mr. Joseph Edward Quirk
1700 S. Amphlett #150
San Mateo CA 94402

DATED this 20 day of April, 2001.



Barbara A. Kaltenbach

1 CODE
John R. Clarkson, Esq.
2 Nevada Bar # 02825
Clarkson Law Office, Ltd.
3 560 E. Plumb Lane
Reno, Nevada 89502
4 Telephone: (775) 324-1111
Attorney for: Plaintiff
5

6 IN THE FAMILY DIVISION

7 OF THE SECOND JUDICIAL DISTRICT COURT OF THE STATE OF NEVADA

8 IN AND FOR THE COUNTY OF WASHOE

9 STEPHANIE ANYA QUIRK,

10 Plaintiff,

11 vs.

Case No. DV01-00329

12 JOSEPH EDWARD QUINN

1 4. A written list of persons (other than expert witnesses or consultants) known to or
2 reasonably believed by Defendant to have knowledge of any facts relevant to the allegations of any
3 pleading filed by Plaintiff or by Defendant, including persons having knowledge of rebuttal or
4 impeachment evidence. Each person must be identified by name and location, along with a general
5 description of the subject matter of the person's testimony.

6 5. All documents that reflect any money or property either Party brought into the marriage
7 or that was given by either Party or received by either Party as a gift or inheritance before or during the
8 marriage. This includes, but is not limited to, any property that Defendant claims as Defendant's separate
9 property and the value of said property. This includes, but is not limited to, inheritance, tax returns, gift
10 tax returns, probate accountings, and specifically includes any property Defendant claims as Defendant's
11 separate property.

12 6. All documents that evidence any degree of ownership by either Party, actual or beneficial,
13 in any personal or real property. This includes any document which may in any way have any bearing
14 on the value thereof now or in the future.

15 7. All documents showing Defendant's gross income and other earnings for the current year
16 and the last three (3) years, including, but not limited to, contracts for employment, deferred
17 compensation agreements, financial statements, income tax returns and all schedules, W-2 forms, other
18 federal income reporting documents, leases, dividend statements, mortgages, checks or check stubs from
19 any employer that reflect your gross income, deductions, bonuses, automobile allowances, commissions,
20 trusts, and other earnings including trades for the current year and the last three (3) years.

21 8. Any and all correspondence, court documents, and other documents that indicate any
22 potential for the receipt of future income, assets or any thing of value such as choses in action,
23 inheritances, trusts, loans to others, deferred investments or any other form of deferred income.

24 9. Any and all documents that indicate any participation in a profit sharing plan, deferred
25 income plan, stock option plan, stock purchase plan, pension plan and other forms that may potentially
26 result in future income.

27 10. All records, statements, plan descriptions, trust agreements, summaries of every type and
28 nature whatsoever concerning any pension, profit-sharing or retirement benefit plan in which Defendant

1 has or had any interest, whether by virtue of Defendant's employment or otherwise, during the Parties'
2 marriage.

3 11. All statements, canceled checks, check registers, deposit slips, pass books, account books,
4 and check stubs for all checking accounts, savings accounts, credit union accounts, time certificates of
5 deposits, money management, and retirement accounts owned by, or in the name of, or controlled
6 directly or indirectly by Defendant, either alone or jointly with any other person, or as a trustee or
7 guardian, or in which Defendant has or had any legal or equitable interest, wherever held, during the
8 Parties' marriage.

9 12. All statements from securities and commodities dealers, mutual funds, and brokerage
10 houses for accounts owned by, or in the name of, or controlled directly or indirectly by Defendant, either
11 alone or jointly with any other person, or as a trustee or guardian, or in which Defendant has or had any
12 legal or equitable interest, wherever held, during the Parties' marriage.

13 13. All stock, bond, and mutual fund certificates owned by, or in the name of, or controlled
14 directly or indirectly by Defendant, either alone or jointly with any other person, or as a trustee or
15 guardian, or in which Defendant has any legal or equitable interest.

16 14. All records pertaining to stock options held by Defendant, either alone or jointly with any
17 other person, or as a trustee or guardian, or in which Defendant has any legal or equitable interest, in any
18 corporation or other entity, exercised or not, during the Parties' marriage.

19 15. All records, including plans, policies, and trust agreements concerning any accident, death
20 benefit, disability, group hospitalization, major medical or dental insurance, and auto insurance of every
21 type and nature whatsoever, in which Defendant is a beneficiary or an owner.

22 16. Records of all safe deposit boxes and their contents in which Defendant claims any
23 interest or for which Defendant has signature privileges to enter.

1 during the Parties' marriage.

2 19. All documents showing any payments made by Defendant for the care, support, education
3 and maintenance of the Parties' minor child.

4 20. All documents or things given to, consulted or used by, any person who has investigated
5 or has knowledge of any matter relating to the case including, but not limited to, any expert witness and
6 any detective or investigator and copies of any reports, photographs, recordings, or documents generated
7 or consulted by said person including, but not limited to, all reports, drafts, notes, and computations.
8 This includes, but is not limited to, reports by physicians, psychiatrists, and psychologists on the
9 physical, mental, or emotional condition of the parties.

10 21. All records indicating criminal charges filed or brought against either party, either felony
11 or misdemeanor (including traffic tickets), by arrest with or without a warrant or whether or not ever
12 arrested, and the final disposition of each such charge.

13 22. Any and all financial statements prepared by or for Defendant, personally or for any
14 business in which Defendant has or had an interest during the Parties' marriage.

15 23. Any and all loan applications prepared by or for Defendant, personally or for any business
16 in which Defendant has or had an interest, for all loans applied for, whether approved or not, during the
17 Parties' marriage.

18 24. All records concerning life insurance on the life of either Party whether individually or
19 through a business interest, including copies of the current beneficiary designation, current information
20 on cash value, and the amount and due date of premium(s).

21 25. All tape recordings and other evidence prepared from tape recordings made in connection
22 with any wiretapping or other electronic surveillance conducted by Defendant or others on Defendant's
23 behalf in connection with this case.

24 26. Any and all documents, or other writings memorializing or in any way recording or
25 reflecting any words, statements, declarations, conversations or other communications by Defendant or

1 Plaintiff.

2 28. Any written or recorded statement of any person concerning the relationship between
3 Defendant and Plaintiff.

4 29. Any written or recorded statement of any party or other person which Defendant
5 contemplates using at trial.

6 30. All documents Defendant intends to introduce into evidence at the trial or that may be
7 used to refresh the recollections of witnesses at depositions or trial.

8 31. All statements and memos relating to witnesses or potential witnesses or persons
9 contacted in connection with this case.

10 32. Any notes, memoranda, or records of any kind pertaining to this case.

11 33. Any and all documents relating to all inquiries or investigations conducted as a result of
12 Plaintiff's claims or allegations.

13 34. Any and all reports, journals, notes or other documents from investigators, detectives or
14 others that Defendant may use at trial.

15 35. Any and all letters, notes, transcripts or other documents that Defendant may use at trial.

16 36. Any and all journals, diaries or calendars that Defendant may use at trial.

17 47. All other documents in the possession or control of Defendant that pertain to this case
18 and that are not described above.

19 DATED this 4th day of May, 2001.

20 Clarkson Law Office, Ltd.
21 Attorneys for STEPHANIE ANYA QUIRK

22 By 

23 John R. Clarkson, Esq.

24 560 E. Plumb Lane

25 Reno, Nevada 89502

26 Telephone: (775) 324-1111

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ACKNOWLEDGMENT

I, Joseph Edward Quirk, the Defendant, hereby acknowledge receipt of a copy of *Plaintiff's Case Conference Production Demand Pursuant to NRCP 16.1(b)*.

DATED this _____ day of May, 2001.

Joseph Edward Quirk

ACKNOWLEDGMENT

Edward Quirk, the Defendant, hereby acknowledge receipt of a copy of *Plaintiff's Case Conference Production Demand Pursuant to NRCP 16.1(b)*.

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I, Joseph
Conference Pro

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