

STATE OF INDIANA	)	IN THE MARION SUPERIOR COURT
	) SS:	
COUNTY OF MARION	)	CIVIL DIVISION, ROOM NO. 12
CECILIA MEANS, on behalf of herself and all others similarly situated,	)	CAUSE NO. 49D120704PL016504
	)	
Plaintiff,	)	
	)	
vs.	)	
	)	
RIVER VALLEY FINANCIAL BANK, a	)	
wholly-owned subsidiary of RIVER	)	
VALLEY BANCORP, <i>et al.</i> ,	)	
	)	
Defendants.	)	

**PLAINTIFF’S FIRST SET OF REQUESTS FOR PRODUCTION TO  
DEFENDANT THE FRIENDSHIP STATE BANK**

Plaintiff, Cecilia Means, by counsel, pursuant to Trial Rules 26 and 34 of the Indiana Rules of Trial Procedure, hereby serves the following Requests for Production to Defendant, The Friendship State Bank, to be answered within thirty (30) days of service hereof.

**DEFINITIONS**

The following definitions shall apply to each and every specific Request below:

“**The Grandview Cemetery**” means the cemetery located at 9306 North U.S. Highway 421, Jefferson County, Indiana, commonly known as Grandview Memorial Gardens.

“**The Pre-Arrangement Trust Fund**” means the Grandview Memorial Gardens, Inc. Pre-Arrangement Trust Fund created on March 23, 1992, and any subsequent amendments.

“**The Friendship State Bank**” means The Friendship State Bank and its predecessors, successors, parents, subsidiaries, branches, divisions, or affiliates, and any other entity related to, owned, or acquired by The Friendship State Bank, at which, or by whom, The Pre-Arrangement Trust Fund was maintained at any time.

## REQUESTS FOR PRODUCTION

**REQUEST NO. 1:** Please produce all documents and things referring, reflecting, or relating to The Pre-Arrangement Trust Fund including, but not limited to, account statements, deposit slips, withdrawal slips, monthly statements, quarterly statements, annual statements, other periodic statements, general ledgers, accountings, trust agreements, requests for withdrawals, records of withdrawals, correspondence or communication with any prior or successor trustee, trust officer, or any other person or entity relating to the trust, documents provided by any current or prior owner or operator of The Grandview Cemetery, investment reports or summaries, and e-mails, letter, or any other documents, electronic or otherwise, which refer or relate to The Pre-Arrangement Trust Fund.


**RESPONSE:**

**REQUEST NO. 2:** Please produce any documents referring, reflecting, or relating to the operating procedures or responsibilities of The Friendship State Bank relating to The Pre-Arrangement Trust Fund, including, but not limited to, any manuals, memoranda, guides, or policies relating to the operation of such a trust and the duties of its trustee.

**RESPONSE:**

Dated: May 16, 2007

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing discovery request was served in paper, via First-Class United States Mail, postage prepaid, and in electronic format via e-mail this 13 day of May, 2007, upon the following counsel:

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