

FRCP 21(a)(1)(A):

NAME	ADDRESS	SUBJECT OF INFORMATION
Robert Braver	c/o Humphreys Wallace Humphreys, P.C 1724 E. Fifteenth St. Tulsa, OK 74104	Mr. Braver is the owner of internet server facilities located in Norman, Oklahoma and was damaged by the spam generated by Defendants which is at issue. It is anticipated that Mr. Braver has knowledge of the emails sent by or on behalf of Defendants and his damages.
Will Henton, Jason (last name unknown), Corporate Representative of Innovative Marketing, Inc., d/b/a Lead Extreme	c/o Phillip L. Free, Jr. Marie S. Johnston Crowe & Dunlevy, P.C. 20 North Broadway, Suite 1800 Oklahoma City, OK 73102	Employee of Defendant Lead Extreme. Testimony will include policies and procedures, employee training, all personal knowledge of this matter, lead generated contracts, knowledge of spam emails used to generate leads, notice, communications with other Defendants and Plaintiff.
Jennifer Eagan, Heather Brunton, Rick Davis, Heidi (last name unknown), C. Abbey Abuka, Ron (last name unknown) Ameriquest Dallas office, Muhammad (last name unknown) Ameriquest Rutherford, NJ office, Mike [Tom/Tong?] (last name unknown) Ameriquest Dallas office, Gonzalo (last name unknown) Ameriquest Dallas office, Kevin (last name unknown)	c/o Kalley R. Aman Michael J. Cereseto Buchalter Nemer Fields & Younger 601 Figueroa Street Suite 2400 Los Angeles, CA 90017 - and - Terry D. Kordeliski Robert A. Nance Riggs Abney Neal Turpen Orbison Lewis 5801 North Broadway Suite 101 Oklahoma City, OK 73118	Employees of Defendant Ameriquest. Testimony will include policies and procedures, employee training, all personal knowledge of this matter, lead generated contracts, knowledge of spam emails used to generate leads, notice, communications with other Defendants and Plaintiff.

NAME	ADDRESS	SUBJECT OF INFORMATION
<p>Amerquest Novi, Michigan office,</p> <p>Virginia (last name unknown) Amerquest Dallas office,</p> <p>Richard Fitzgerald, Amerquest Dunwoody, GA office,</p> <p>Sean Doane, Amerquest St. Charles, Missouri office,</p> <p>Corporate Representative of Amerquest Mortgage Company</p>		
<p>Tim Bancroft,</p> <p>Lindsay G. Hale,</p> <p>Andre Stecki,</p> <p>Corporate Representative of Go Apply, Inc. d/b/a eLeadZ</p>	c/o	<p>Testimony will include policies and procedures, employee training, all personal knowledge of this matter, lead generated contracts, knowledge of spam emails used to generate leads, notice, communications with other Defendants and Plaintiff..</p>
<p>Sean Fenlon</p> <p>Corporate Representative of The Loan Page, Inc.</p>	c/o	<p>Testimony will include policies and procedures, employee training, all personal knowledge of this matter, lead generated contracts, knowledge of spam emails used to generate leads, notice, communications with other Defendants and Plaintiff.</p>
<p>Robert Biggerstaff</p>	<p>P.O. Box 614 Mt. Pleasant, SC</p>	<p>Plaintiff's client; Will testify concerning spams which escaped filters and other procedures put in place by Plaintiff.</p>
<p>Adri-Anne Trammell</p>	<p>521 Bethany Oaks Drive Norman, OK 73071</p>	<p>Plaintiff's client; Will testify concerning spams which escaped filters and other procedures put in place by Plaintiff.</p>
<p>David Lewis CDI Solutions</p>	<p>1665 County Road 1380 Chickasha, OK 73018</p>	<p>Plaintiff's client; Will testify concerning spams which escaped filters and other procedures put in place by Plaintiff.</p>

FRCP (a)(1)(B): The electronic documents produced via hand delivery to local counsel are identified as:

One Data Disc with correspondence, email, decoy information, response forms, domain identification information, landing pages and news articles and industry publications related to mortgage spam.

Three Audio discs containing recorded communications:

AUDIO CD 1

1. Lead Extreme July 31, 2003
2. Ameriquest – Jennifer Egan – Rick Davies – Aug. 5, 2003
3. Ameriquest – Follow-up message left with Rick Fd Davies – Aug. 5, 2003
4. Ameriquest Office – October 23, 2003
5. Ameriquest – Jennifer Egan – October 24, 2003

AUDIO CD 2

1. July, 2003 Conversation with Monte Perini (unsure of spelling) Agent of The Loan Page
2. Voice mail left with Sean of The Loan Page
3. Ameriquest – Nov. 11, 2003
4. Ameriquest e – June 24, 2004 9:15 AM
5. Ameriquest - June 24, 2004 2:12 PM
6. Ameriquest – June 24, 2004 2:58 PM
7. Ameriquest – June 24, 2004 4:22 PM
8. Ameriquest – June 25, 2004 7:04 PM
9. Ameriquest – June 28, 2004 11:52 AM
10. Ameriquest – July 7, 2004 5:00 PM
11. Ameriquest – July 6, 2004 4:39 PM
12. Ameriquest – July 7, 2004 8:49 AM
13. Ameriquest – August 11, 2004 3:11 PM
14. Ameriquest – August 23, 2004 7:25 PM
15. Ameriquest – August 25, 2004 6:02 PM
16. Ameriquest – August 31, 2004 5:30 PM

AUDIO CD 3

1. Ameriquest – September 23, 2004 7:58 PM
2. Ameriquest – September 23, 2004 8:17 PM
3. Loan Page – September 24, 2004 2:28 PM

4. Ameriquest – December 29, 2004 6:40 PM
5. Ameriquest – December 29, 2004 7:02 PM
6. Ameriquest – December 30, 2004 12:23 PM
7. Ameriquest – January 18, 2005 6:56 PM
8. Ameriquest – December 31, 2004 11:14 AM
9. Ameriquest – January 3, 2005 10:10 AM
10. Ameriquest – January 5, 2005 5:46 PM
11. Ameriquest – January 6, 2005 11:01 AM
12. Ameriquest – January 10, 2005 12:14 PM
13. Ameriquest – January 11, 2005 10:28 AM
14. Ameriquest – January 11, 2005 7:04 PM
15. Ameriquest – January 12, 2005 1:59 PM
16. Ameriquest – January 12, 2005 7:04 PM
17. Ameriquest - January 13, 2005 11:35 AM
18. Ameriquest – January 14, 2005 10:35 AM
19. Ameriquest – January 14, 2005 6:14 PM
20. Ameriquest – January 17, 2005 1:40 PM
21. Ameriquest – January 18, 2005 11:35 AM
22. Other lender, IDs ELEADZ as source

FRCP (a)(1)(C):

Damages for loss of time and inconvenience continue to be incurred. The Plaintiff is continuing his efforts to calculate these damages and anticipates begin able to identify the number of hours lost and may leave the value of said time up to the Court and Jury. Regarding inconvenience, the Plaintiff is unable at this time to calculate this non-pecuniary damage. Plaintiff continues to assemble the spam which violates state and federal law and is still calculating statutory damages. Plaintiff will also seek aggravated damages.

INSURANCE: Not Applicable.

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s/ Luke J. Wallace