

**SUPREME COURT OF THE UNITED STATES**

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DELAWARE, *Plaintiff*,

v.

Nos. 220145 & 220146 (Consolidated)

ARKANSAS, *ET AL.*, *Defendants*

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**NOTICE OF DEPOSITION OF RONALD J. MANN BY THE COMMONWEALTH  
OF PENNSYLVANIA WITH REQUESTS FOR PRODUCTION OF DOCUMENTS**

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Defendant, the Commonwealth of Pennsylvania, by its undersigned counsel, will take the videotaped deposition upon oral examination, for purposes of discovery/use at trial, of Ronald J. Mann, the expert witness of the State of Delaware, on **November 9, 2018 at 9:00 a.m.** at:

Loeb & Loeb LLP  
345 Park Avenue  
New York, NY 10154

The deposition will take place before an officer duly authorized to administer oaths and will continue thereafter from day to day until completed. The deposition shall be recorded by stenographic means and video recorded.

PLEASE TAKE FURTHER NOTICE that the deponent is required to produce for inspection and copying the documents and writings specified herein below to his deposition on November 9, 2018 at 9:00 a.m.

**DEMAND FOR PRODUCTION OF DOCUMENTS**

**DEMAND FOR PRODUCTION NO. 1:**

Any and all engagement or retainer letters and/or agreements with Ronald J. Mann with respect to Ronald J. Mann's work regarding *Delaware v. Arkansas, et al.*, Case nos. 220145 and 220146.

**DEMAND FOR PRODUCTION NO. 2:**

Any and all notes, correspondence, e-mails, and/or other documents which constitute, evidence, reflect, and/or refer to any communications between Ronald J. Mann and any third party regarding *Delaware v. Arkansas, et al.*, Case nos. 220145 and 220146.

**DEMAND FOR PRODUCTION NO. 3:**

Any and all literature (whether in printed or electronic form and included within Ronald J. Mann's hard copy and/or electronic files) reviewed, analyzed, consulted, referred to, and/or relied upon Ronald J. Mann in connection with preparing his testimony and opinions in *Delaware v. Arkansas, et al.*, Case nos. 220145 and 220146.

**DEMAND FOR PRODUCTION NO. 4:**

Any and all written testimony (including exhibits) and transcripts of oral testimony (including exhibits) given by Ronald J. Mann as an expert witness at any hearing, trial, deposition, or other legal proceeding(s) within the last four (4) years relating to and/or interpreting provisions of Article 3 and/or Article 4 of the Uniform Commercial Code, and/or relating to or interpreting terms of negotiable instruments.

**DEMAND FOR PRODUCTION NO. 5:**

Any and all expert reports submitted, or prepared for submission, by Ronald J. Mann in any legal proceeding within the last four (4) years relating to or interpreting provisions of Article 3 and/or Article 4 of the Uniform Commercial Code, and/or relating to or interpreting terms of negotiable instruments.



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**CERTIFICATE OF SERVICE**

I, Lorena E. Ahumada, certify that on this 29 day of October 2018, I caused a true and correct copy of foregoing Notice of Deposition to be served pursuant to the Case Management Order No. 2, dated September 12, 2017.



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Lorena E. Ahumada, Esquire