DEFENDANT/CROSS-COMPLAINANT WESTERN NATIONAL CONSTRUCTION ("Responding Party") hereby provides Responses to Defendant/Cross-Defendant TARA COATINGS, INC. ("Propounding Party") Supplemental Request for Production of Documents as follows:

PRELIMINARY STATEMENT

Nothing in this response should be construed as an admission by Responding Party with
respond to the admissibility or relevance of any fact or document, or of the truth or accuracy of any characterization or statement of any kind contained in Propounding Party's Demands for Production. Responding Party has not completed its investigation of the facts relating to this case, its discovery or its preparation for trial. All responses and objections contained herein are based only upon such information and such documents that are presently available to and specifically known by Responding Party. It is anticipated that further discovery, independent investigation, legal research and analysis will supply additional facts and add meaning to known facts, as well as establish entirely new factual conclusions and legal contentions, all of which may lead to substantial additions to, changes in and variations from the responses set forth herein. The following objections and responses are made without prejudice to Responding Party's right to produce at trial, or otherwise, evidence regarding any subsequently discovered documents. Responding Party accordingly reserves the right to modify and amend any and all responses herein as research is completed and contentions are made.

GENERAL OBJECTIONS TO DEMANDS FOR PRODUCTION

Responding Party generally objects to the Demands for Production as follows:

A. Responding Party objects generally to the Demands for Production to the extent that they seek to elicit information that is neither relevant to the subject matter of this action, nor reasonably calculated to lead to the discovery of admissible evidence;

B. Responding Party objects generally to the Demands for Production to the extent that they are unreasonably overbroad in scope, and thus burdensome and oppressive, in that each such request seeks information pertaining to items and matters that are not relevant to the subject matter of this action, or, if relevant, so remote therefrom as to make its disclosure of little or no practical benefit to Propounding Party, while placing a wholly unwarranted burden and expense on Responding Party in locating, reviewing and producing the requested information;

C. Responding Party objects generally to the Demands for Production to the extent that they are burdensome and oppressive, in that ascertaining the information necessary to respond to them, and to produce documents in accordance therewith, would require the review and compilation of information from multiple locations, and voluminous records and files, thereby
involving substantial time of employees of Responding Party and great expense to Responding Party, whereas the information sought to be obtained by Propounding Party would be of little use or benefit to Propounding Party;

D. Responding Party objects generally to the Demands for Production to the extent that they are vague, uncertain and overbroad, being without limitation as to time or specific subject matter;

E. Responding Party objects generally to the Demands for Production to the extent that they seek information at least some of which is protected by the attorney-client privilege or the attorney work-product doctrine, or both;

F. Responding Party objects generally to the Demands for Production to the extent that they seek to have Defendant and Cross-Complainant furnish information and identify documents that are a matter of the public record, and therefore, are equally available to the propounding party as they are to Responding Party; and

G. Responding Party objects generally to the Demands for Production to the extent that they seek to have Responding Party furnish information and identify documents that are proprietary to Responding Party and contain confidential information.

Without waiver of the foregoing, Responding Party further responds as follows:

**RESPONSES TO SUPPLEMENTAL REQUESTS FOR PRODUCTION**

**SUPPLEMENTAL DEMAND FOR PRODUCTION NO. 1:**

Please review YOUR responses to Defendant, TARA COATING, INC.’s, Demand for Production of Documents previously served on YOU (YOU includes you, your agents, your employees, your representatives, subsidiaries, and affiliates, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators and anyone else acting on your behalf) in this action and update YOUR response by providing all additional documents that are responsive to the Demands for Production of Documents, including all documents not previously produced by YOU. If no additional documents exist, please so state.

**RESPONSE TO DEMAND FOR PRODUCTION NO. 1:**

Objection. This demand is overbroad, vague and ambiguous and seeks information
protected by the attorney-client privilege and work product doctrine. Furthermore, the Propounding Party never served Responding Party with a Request for Production of Documents, making it impossible to respond to this discovery request. Without waiving said objections, Responding Party responds as follows: Responding Party has deposited all responsive documents in the document depository in this matter, the documents are equally available to Propounding Party.

Dated: May 19, 2016

GREEN & HALL, LLP

Michael A. Erlinger
Attorneys for WESTERN NATIONAL CONSTRUCTION
VERIFICATION

I have read the foregoing RESPONSE OF WESTERN NATIONAL CONSTRUCTION TO SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY TARA COATINGS, INC. and know its contents.

I am an Agent of Western National Construction, a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. I am informed and believe and on that ground allege that the matters stated in the foregoing document are true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 4, 2016, at Irvine, California.

Jim Gilly
Print Name of Signatory

Signature
PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1851 East First Street, 10th Floor, Santa Ana, CA 92705-4052.

On May 20, 2016 I served the within document(s) described as:

RESPONSE OF WESTERN NATIONAL CONSTRUCTION TO SUPPLEMENTAL REQUEST FOR PRODUCTION OF DOCUMENTS PROPOUNDED BY TARA COATINGS, INC.

BY E-SERVICE: I electronically served the document(s) via Santa Clara County Superior Court's Electronic Filing System on the recipients designated on the transaction receipt located on the Santa Clara County Superior Court's Electronic Filing System website. [See Transaction Receipt on SCE Filing Website]

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on May 20, 2016, at Santa Ana, California.

Carie Howard