



Feb 10 2011
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<p>DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, Colorado 80202</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p>PLAINTIFFS: Anthony Lobato, et al.</p> <p>and</p> <p>PLAINTIFFS-INTERVENORS: Armandina Ortega, et al.</p> <p>vs.</p> <p>DEFENDANTS: The State of Colorado, et al.</p>	
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<p style="text-align: center;">DEFENDANTS' <u>SECOND</u> REQUEST FOR PRODUCTION OF DOCUMENTS TO INDIVIDUAL PLAINTIFFS</p>	

Defendants, by their counsel, propound the following Second Requests for Production of Documents to be answered by Individual Plaintiffs within 30 days of service.

DEFINITIONS AND INSTRUCTIONS

A. The term “document” means the original and identical or non-identical copy or any draft of any kind of any written, recorded, or graphic matter, however produced, stored, or preserved, including, but not limited to, storage in a computer system or database whether consisting of paper, disks, CDs, in digital format or any other form, ESI, or any other written or recorded or graphic material whatsoever.

B. The term “all” includes the term “any” and vice-versa.

DOCUMENTS REQUESTED

21. All documents referenced in Plaintiffs’ Second Amended Complaint, describing with particularity in which paragraph or paragraphs each of the documents are referenced.

DATED: February 10, 2011

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*Original signature of Nicholas Heinke is
on file at the Office of the Colorado Attorney
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CERTIFICATE OF SERVICE

This is to certify that I have duly served the within **DEFENDANTS' SECOND REQUEST FOR PRODUCTION OF DOCUMENTS TO INDIVIDUAL PLAINTIFFS** upon all parties herein via electronic mail, Lexis/Nexis File & Serve, and/or U.S. Mail this 10th day of February, 2011:

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