

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
BAY CITY**

IN RE: Kevin W. Kulek

Chapter 7 Petition  
16-21030-dob  
Honorable Daniel Opperman

\_\_\_\_\_/

RANDALL L. FRANK, TRUSTEE,  
Plaintiff,

Adversary Case Number  
17-02001  
Honorable Danifel Opperman

V

TIMOTHY J. FIFE,  
Defendant.

\_\_\_\_\_/

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**Rule 26 and 34 Requests for Production of Documents**

NOW COMES Plaintiff, Randall L. Frank, Trustee, by and through his attorneys, Keith M. Nathanson, PLLC, and for his requests for production of documents pursuant to F.R.Civ.P. Rule 26 and 34 to Defendant, states as follows:

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure and Civil Local Rule 34, the United States shall produce copies of the following documents, within thirty (30) days of the service

of this discovery request, at the following address Keith M. Nathanson, PLLC, Special Litigation Counsel to Randall Frank, Trustee, 2745 Pontiac Lake Road, Waterford, MI 48328.

If you object to any documents requested on the grounds of privilege, work product or other grounds, your response should state the existence of the information, document or communication, identify the specific grounds on which your objection is based in a manner that will enable other parties to assess the claim, and identify the information objected to by furnishing its date, participants (e.g., names of speakers or authors or addressees) and a general description of the nature of the purportedly protected information. If the objected to document contains relevant non-objectionable matter, you should produce it, with the objectionable matter redacted.

## II. DEFINITIONS The following definitions apply to these document production requests:

1. Document. The term “document” is defined as set forth in Rule 34(a) of the Federal Rules of Civil Procedure. “Document” shall be broadly defined to include electronically-stored information and all media on which information is recorded or stored.

2. Communication. “Communication” means the written, verbal, and/or any records of the transmission of information (in the form of facts, ideas, inquiries, or otherwise).

3. You or Your. The words “you” or “your” means Amanda Kulek, and any and all business entities owned and/or operated by Amanda Kulek, including, but not limited to Fae Laume Photography, including its present and former members, officers, agents, employees, and all other persons acting or purporting to act on its behalf, including all present or former members, officers, agents, employees, and all other persons exercising or purporting to exercise discretion, make policy, and/or make decisions.

4. Pertaining. “Pertaining” means relating to, referring to, describing, evidencing or constituting.

5. And/Or. The connectives “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

## III. DOCUMENT PRODUCTION REQUESTS

1. All documents pertaining to the purchase of the Predator pinball machine, parts, accessories, computer code, graphics, accessories from Michael Magyari and/or Kevin Kulek, or any other person.
2. All documents pertaining to the purchase of the Experts of Dangerous pinball machine, parts, accessories, computer code, graphics, accessories from Michael Magyari and/or Kevin Kulek, or any other person.
3. Any and all receipts or other documents issued and/or received from any person for the purchase of the Predator pinball machine, parts, accessories, computer code, graphics, accessories from Michael Magyari and/or Kevin Kulek, or any other person.
4. Any and all receipts or other documents issued and/or received from any person for the purchase of the Experts of Dangerous pinball machine, parts, accessories, computer code, graphics, accessories from Michael Magyari and/or Kevin Kulek, or any other person.

Respectfully submitted,

/s/ Keith M. Nathanson

Keith M. Nathanson, P41633

Special Litigation Counsel for the Chapter 7 Trustee

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Dated: June 1, 2017