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REP

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

received
3/5/07

CHARLESTON DIVISION

TRADEMARK PROPERTIES,)
INC., a South Carolina corporation;)
RICHARD C. DAVIS, an individual)
)
Plaintiffs,)

Civil Action No.2:06-CV-2195-CWH

vs.)

A&E TELEVISION NETWORKS,)
and MAX WEISSMAN)
PRODUCTIONS, INC. d/b/a)
DEPARTURE FILMS)
)
Defendants.)

PLAINTIFF'S SUPPLEMENTAL
RESPONSES TO THE DEFENDANTS/
COUNTERCLAIM PLAINTIFF FIRST
REQUEST FOR PRODUCTION

A&E TELEVISION NETWORKS,)
)
Counterclaim Plaintiff,)

vs.)

TRADEMARK PROPERTIES, INC.)
and RICHARD C. DAVIS,)
)
Counterclaim Defendants.)

TO: ROBERT H. JORDAN, ESQUIRE, ATTORNEY FOR A&E TELEVISION NETWORKS:

The Plaintiff's, pursuant to the Order of the Honorable C. Weston Houck, United States District Court Judge, hereby supplements their responses to the Defendants'/Counterclaim Plaintiff's First Request for Production.

5. Documents sufficient to show Plaintiffs' financial conditions at year-end for every year from 2003 to the present, including revenues and profits or losses generated.

A copy of the documents are attached.

7. All documents concerning any communications between Plaintiffs and any other person or entity concerning the claims, counterclaims or defenses asserted in this lawsuit, including but not limited to the St. Paul Saints, Tom Whaley, Creative Artists Agency (CAA), Bryan Geers and Pierre Brogan.

Documents are attached except for documents that are subject to the attorney privilege. See attached log.

8. All documents concerning the communications between Plaintiff's and television networks other than A&E, including but not limited to The Learning Channel and any of its affiliates.

Copies of all documents are attached.

10. All documents concerning any television shows that have a concept or format similar to that of the Series.

The Plaintiffs are not aware of any documents concerning television shows that have a concept or format similar to that of the Series.

26. All documents reflecting any executed or final agreements between Plaintiffs and The Learning Channel or any of its affiliates.

The Plaintiffs do not currently have a copy of the executed contract but have requested a copy.


CISA & DODDS, LLP



Frank M. Cisa
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
(843) 881-3700

This 28th day of February, 2007
Mt. Pleasant, SC

TRADEMARK PROPERTIES, INC.

By: 
Its: President

This 28th day of February, 2007

Richard C. Davis

This 28th day of February, 2007

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
CHARLESTON DIVISION

TRADEMARK PROPERTIES,)
INC., a South Carolina corporation;)
RICHARD C. DAVIS, an individual)

Civil Action No.2:06-CV-2195-CWH

Plaintiffs,)

vs.)

A&E TELEVISION NETWORKS,)
and MAX WEISSMAN)
PRODUCTIONS, INC. d/b/a)
DEPARTURE FILMS)

CERTIFICATE OF MAILING

Defendants.)

A&E TELEVISION NETWORKS,)

Counterclaim Plaintiff,)

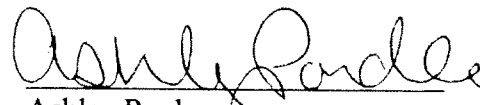
vs.)

TRADEMARK PROPERTIES, INC.)
and RICHARD C. DAVIS,)

Counterclaim Defendants.)

I, Ashley Pardee, Legal Assistant to Frank M. Cisa, hereby certify that on the 2nd day of
march, 2007 I mailed, postage prepaid via United States Mail, the Plaintiffs' First
Supplemental Request for Production to the Defendants/Counterclaim Plaintiff, in the above-
captioned action to:

Robert H. Jordan, Esquire
Nelson Mullins Riley & Scarborough, LLP
151 Meeting Street
Charleston, SC 29401


Ashley Pardee

IN THE UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

TRADEMARK PROPERTIES,)
INC., a South Carolina corporation;)
RICHARD C. DAVIS, an individual)

Civil Action No.2:06-CV-2195-CWH

Plaintiffs,)

vs.)

A&E TELEVISION NETWORKS,)
and MAX WEISSMAN)
PRODUCTIONS, INC. d/b/a)
DEPARTURE FILMS)

PLAINTIFFS' SUPPLEMENTAL
ANSWER TO THE DEFENDANTS/
COUNTERCLAIM PLAINTIFF'S
FIRST SET OF INTERROGATORIES

Defendants.)

A&E TELEVISION NETWORKS,)

Counterclaim Plaintiff,)

vs.)

TRADEMARK PROPERTIES, INC.)
and RICHARD C. DAVIS,)

Counterclaim Defendants.)

The Plaintiffs hereby supplement their answers to the Defendants/Counterclaim

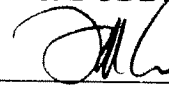
Plaintiff's First Set of Interrogatories as follows:

1. Identify all persons known to Plaintiffs or their counsel who have knowledge concerning the factual allegations set forth in the Complaint and any responsive pleading to the complaint, including the general nature of each person's knowledge.

Christopher T. Davis
846 ½ N. Wilcox Avenue
Hollywood, Ca 90038

Christopher T. Davis is the brother of the Plaintiff, Richard C. Davis, and will testify concerning registration of Plaintiffs treatment titled "Worst to First" with the Writers Guild of American, West, Inc. He will also testify that he has no ownership interest in the subject registration.

CISA & DODDS, LLP



Frank M. Cisa
622 Johnnie Dodds Blvd.
Mt. Pleasant, SC 29464
(843) 881-3700

This 12th day of March, 2007
Mt. Pleasant, SC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

CHARLESTON DIVISION

TRADEMARK PROPERTIES,)
INC., a South Carolina corporation;)
RICHARD C. DAVIS, an individual)

Civil Action No.2:06-CV-2195-CWH

Plaintiffs,)

vs.)

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and MAX WEISSMAN)
PRODUCTIONS, INC. d/b/a)
DEPARTURE FILMS)

CERTIFICATE OF MAILING

Defendants.)

A&E TELEVISION NETWORKS,)

Counterclaim Plaintiff,)

vs.)

TRADEMARK PROPERTIES, INC.)
and RICHARD C. DAVIS,)

Counterclaim Defendants.)

I, Ashley Pardee, Legal Assistant to Frank M. Cisa, hereby certify that on the 12th day of
march, 2007 I mailed, postage prepaid via United States Mail, the Plaintiffs' Supplemental
Answers to the Defendants/Counterclaim Plaintiff's First Set of Interrogatories, in the above-
captioned action to:

Richard Ashby Farrier, Jr., Esquire
Nelson Mullins Riley & Scarborough, LLP
151 Meeting Street
Charleston, SC 29401


Ashley Pardee