Nelson Mullins

Nelson Mullins Riley & Scarborough LLP

Attorneys and Counselors at Law 151 Meeting Street / Sixth Floor / Charleston, SC 29401-2239 Tel: 843.853.5200 Fax: 843.720.4353 www.nelsonmullins.com Richard A. Farrier, Jr. Tel: 843.720.4301 Fax: 843.720.4353

richard.farrier@nelsonmullins.com

Page 1 of 2

January 31, 2008

Via Facsimile and U.S. Mail

Frank M. Cisa, Esq. Cisa & Dodds, LLP 858 Lowcountry Blvd., Suite 101 Mt. Pleasant, SC 29464

RE: Trademark Properties and Richard C. Davis v. A&E Television Networks and

Max Weissman Productions, Inc. d/b/a Departure Films

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

Our File No.: 28692/01500

Dear Frank:

Some of the testimony given during last week's depositions of Richard Davis, Ginger Alexander and Trademark Properties indicates that we have not received all the documents responsive to our requests. We have identified these priority items for production:

- 1. Any documents relating to a ratings bonus Mr. Davis received from TLC/Discovery (Davis 1/24 Tr. 22) or relating to the current status/any future production of Mr. Davis' show on TLC (Davis 1/24 Tr. 19-20; Alexander 1/25 Tr. 80-84).
- 2. Documents, including emails between Mr. Davis and RBC, regarding the "\$100 million line of credit" mentioned in the demo tape, in particular any documents regarding how much of the money was actually raised and any documents regarding the reasons for terminating the fundraising effort. Davis 1/24 Tr. 75-76; Alexander 1/25 Tr. 89-91.
- 3. Documents, including emails between Mr. Davis and TLC/Discovery, regarding Discovery's show "Flip That House." Davis 1/24 Tr. 85-86.
- 4. An email from Mr. Davis to A&E regarding changing the ending of the Folly Beach episode. Davis 1/24 Tr. 166-67.

Exhibit G

Frank M. Cisa, Esq. January 31, 2008 Page 2

- 5. Emails from Mr. Davis to A&E or Departure Films asking them to make changes to information shown during episodes of "Flip This House." Davis 1/24 Tr. 170.
- 6. Documents that show how many closings Trademark did on a year to year basis and how many were general brokerage versus condos. Mr. Davis indicated that Ms. Alexander would have these documents. Trademark 1/25 Tr. 31-32.
- 7. Any and all video of the July 27, 2007 meeting for Trademark Area Partners in Charleston, South Carolina, including but not limited to video containing any references to "Flip This House." Trademark 1/25 Tr. 52-54.

We ask that you produce these materials so that we receive them by Wednesday, February 13, 2008. Thank you in advance for your courtesy in this matter.

Very truly yours,

RAFJR:dh

cc: Jeremy Feigelson, Esq.

Richard A. Farrier, Jr.