

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

OTIS AND FIONA OLMAN,

Plaintiffs,

v.

Case No. 8-16-CV-00637

FULL MOON SPORTS, INC.,
& BRUCE BELCHER,

Defendants.

**PLAINTIFF'S FIRST REQUEST
FOR PRODUCTION OF DOCUMENTS**

As authorized by Federal Rule of Civil Procedure 34, Plaintiffs hereby request that Defendant produce for inspection and copying the documents described below.

Definitions

Unless otherwise indicated, the following definitions shall apply to all the requests set forth below.

1. The term "concerning" means relating to, referring to, describing, evidencing or constituting.
2. The term "Defendant" means Full Moon Sports, Inc. and any of its officers, agents, employees or representatives.
3. The term "Jacksonville Store" means the Full Moon Outdoor Center, a retail sporting goods store located in Jacksonville, Florida, and owned by Defendant.

* * * *

Document Requests

1. The personnel files for Otis Olman and Fiona Olman.
2. The personnel or employee handbook(s) or manual(s) in effect at the Defendant for the period during which either Otis Olman or Fiona Olman were employed by Defendant.

6. All documents concerning any investigation performed by Defendant or at its request concerning allegations that any employee, including either Plaintiff in this action, was terminated, demoted, transferred, denied a promotion, or otherwise harmed as a result of such employee's age.
7. All documents concerning or supporting Defendant's allegation in its Answer and Counterclaim that Plaintiff Otis Olman converted Defendant's property.

RULE
26(b)(1)

15. All communications, including but not limited to email or other electronic communications, concerning the reduction in force at the Jacksonville store.
16. All documents concerning reductions in force for the period from 2015 to the present at any of the Defendant's retail locations, corporate headquarters, or any other location at which the Defendant conducts its business that indicate the ages of those employees terminated, transferred, or demoted as well as the ages of those persons who replaced such persons in the positions they held prior to the reduction in force.

RULE
26(a)(1)(ii)

OTIS OLMAN
FIONA OLMAN
By their attorney,

Eleanor Lane
Lane & Quincy, P.A.
Trial Counsel for Plaintiffs
[Address etc. omitted]

[certificate of service omitted]