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6 **IN THE UNITED STATES BANKRUPTCY COURT**
7 **FOR THE DISTRICT OF ARIZONA**

8 In re
9 GRANITE DELLS RANCH HOLDINGS, LLC,
Debtor.

Chapter 11
Case No. 2:12-bk-04962-EPB

10 **REQUEST FOR PRODUCTION**

13 **NOTICE IS HEREBY GIVEN** that Granite Dells Ranch Holdings, LLC (“GDRH”) requests,
14 pursuant to Fed. R. Bankr. P. 9014(c) and 7034, incorporating Fed. R. Civ. P. 34, that Arizona Eco
15 Development, LLC, an Arizona limited liability company (“AED”) produce and permit the inspection
16 and copying of the following documents in AED’s possession or to which AED has access at the place,
17 date and time specified below:

- 18
- 19 1. Any and all invoices, bills or billing statements for legal services provided to AED Eco
20 Development, LLC by Snell and Wilmer from March 13, 2012 through March 27, 2013
related to Debtor's bankruptcy case (Case No. 2:12-bk-04962-EPB).

21 For purposes of this Request for Production, the term “Document” includes all “documents
22 and tangible things” to the very broadest extent included within the scope of the Fed. R. Civ. P. 34 (as
23 incorporated by Fed. R. Bankr. P. 7034), including but not limited to, the originals and all drafts and
24 copies, together with any annotations or highlighted copies containing all or part of the information
25 requested, in the possession, custody or control of you, your attorneys, representatives, employees,
26 agents or any other natural person or business or legal entity acting or purporting to act for or on your
27 behalf, of their respective directors, officers, representatives, employees or agents, as the case may be.
28 Also, the term “Document” or “writing” means any medium whatsoever, including all electronic,
recorded and digital media of any kind, upon which intelligence or information can be recorded or
retrieved, and includes, without limitation, the original and each copy, regardless of origin and
location, of any written material, correspondence, electronic mail, note, file, book, pamphlet, printout,
chart, record, report, periodical, letter, memorandum (including any memorandum or report of a
meeting or conversation), invoice bill, order form, receipt, financial statement, accounting entry, diary,
draft, working paper, chart, paper, print, drawing, sketch, graph, index, list, and any written, recorded,

1 transcribed, punched, taped, filmed, or graphic matter whatsoever, however produced or reproduced,
2 which is in Your possession, custody, or control or which was, but is no longer, in Your possession,
3 custody, or control. The term "Document" or "writing" shall also include all copies or drafts of
Documents by whatever means made, including specifically but not exclusively, those copies bearing
commentary or notations not appearing on the original.

4 **DATE AND TIME OF PRODUCTION:** **Friday, July 5, 2013**
5 **5:00 p.m.**

6 **PLACE OF PRODUCTION:** **Stinson Morrison Hecker LLP**
7 **1850 N. Central Avenue, #2100**
8 **Phoenix, Arizona 85004-4584**

9 DATED this June 4, 2013.

10 **STINSON MORRISON HECKER LLP**

11 By: /s/ Alan A Meda (#009213)

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15 Attorneys for GDRH

16 COPY of the foregoing sent this June 4, 2013, to:

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25 Statutory Agent for AED Eco Development, LLC

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