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ROSA CORREA
7110 Grays Avenue
Philadelphia, PA 19143

MICHAEL HAMILTON
7110 Grays Avenue
Philadelphia, PA 19143

Plaintiffs,

v.

ABC CAPITAL INVESTMENTS LLC
1218 N. Marshall Street
Philadelphia, PA 19122

ABC CAPITAL REALTY LLC
1218 N. Marshall Street
Philadelphia, PA 19122

SAAT INVESTMENTS LLC
1218 N. Marshall Street
Philadelphia, PA 19122

Defendants.

COURT OF COMMON PLEAS
PHILADELPHIA COUNTY
CIVIL DIVISION
NOVEMBER TERM, 2018
NO. 18113477

PLAINTIFFS' REVISED FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANTS ABC CAPITAL INVESTMENTS LLC, ABC CAPITAL REALTY LLC, and SAAT INVESTMENTS LLC

Plaintiffs, by their undersigned attorneys, and pursuant to the Court's order following the hearing on Plaintiffs' motion to strike and for sanctions held on May 8, 2019, hereby request that you produce for inspection and copying the documents designated below at the offices of Plaintiffs' co-counsel, Ballard Spahr LLP, 1735 Market Street, 51st Floor, Philadelphia, PA 19103, within twenty (20) days from the date of service hereof, in accordance with Rule 4009.11 of the Pennsylvania Rules of Civil Procedure and order of the Court.

This request for discovery is continuing. Should Defendants at any time subsequent to the service or filing of answers to this request for discovery become aware of information or documents that renders those answers incomplete, inaccurate, or misleading in any respect, supplemental answers are promptly required.

DEFINITIONS

1. Plaintiffs incorporate the Definitions provided in their First Request for Production of Documents to Defendants ABC Capital Investments LLC and ABC Capital Realty LLC and their First Request for Production of Documents to Defendant SAAT Investments LLC.

INSTRUCTIONS

In responding to this discovery request, the following instructions shall apply:

1. Plaintiffs incorporate the Instructions provided in their First Request for Production of Documents to Defendants ABC Capital Investments LLC and ABC Capital Realty LLC and their First Request for Production of Documents to Defendant SAAT Investments LLC.

2. Unless otherwise noted in the specific request, each request shall cover the period between June 23, 2016 and December 1, 2017, which corresponds with Plaintiffs' tenancy in the Property.

REQUESTED DOCUMENTS

1. Any and all communications relating to repairs at or maintenance of the Property, or repairs requested by or performed for the Plaintiffs, between you and any agents or other entity or individual.

2. Any and all documents relating to any repairs or improvements made at the Property, including, but not limited to, requests, responses, receipts, invoices, or work orders.

3. Any and all rental licenses and applications therefor, Certificates of Rental Suitability, lead safe certificates, lead free certificates, and any other documentation required by the Philadelphia Code or any other law regarding residential leases related to the Property.

4. Any and all documents identifying or relating to any management fees paid or owed by you to any person, or paid or owed to you by any person, to the extent related to the Property, including a copy of the Property Management Agreement and other similar documents between ABC Capital Investments LLC, ABC Capital Realty LLC, and/or SAAT Investments LLC.

5. Any and all documents relating to the purchase, sale, or transfer of the Property.

6. Any insurance policies relating to the Property with you as the beneficiary, in effect from April 22, 2013 to the present.

7. An organizational chart reflecting departments and/or personnel involved with the marketing of properties for rent, the rental and lease of properties, the repair of properties, or any

efforts to bring enforcement actions against lessees for breach of lease including but not limited to eviction.

8. An organizational chart reflecting your corporate organization and structure.

9. Any and all documents relating to the formation, governance, and operation of your corporate organization, including but not limited to operating agreements, certificates of organization, articles of incorporation, annual reports and renewals, corporate by-laws, a list of managing or non-managing members, records of meetings and the minutes thereof, and financial statements.

Dated: May 13, 2019

/s/ Michael R. McDonald

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Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on May 13, 2019, I caused a true and correct copy of the foregoing Plaintiffs' Revised First Request for Production of Documents to Defendants ABC Capital Investments, LLC, ABC Capital Realty, LLC, and SAAT Investments LLC, to be served upon their attorney at the following address by email:

Christopher A. Bradley, Esq.
The Swain Law Firm
2410 Bristol Road
Bensalem, Pa. 19020

/s/ Michael R. McDonald
Michael R. McDonald, Esquire