

DISTRICT COURT, PARK COUNTY COLORADO 300 – 4 th Street Fairplay, Colorado 80440	
Plaintiffs: ELK FALLS PROPERTY OWNERS ASSOCIATION, a Colorado corporation; KATHRYN WELLS; THE PAUL VASTOLA AND SUZANNE G. NELSON LIVING TRUST, U/A DATED 8/10/01; ROBERT W. PHELPS; and KEVIN O'CONNELL Defendants: VERA B. DUNWODY and DRAYTON D. DUNWODY, and FARM CREDIT OF SOUTHERN COLORADO, ACA, an agricultural credit association Plaintiffs in Intervention: PETER J. BRAUN and RENAE J. BRAUN	▲ COURT USE ONLY ▲
Victor F. Boog, No. 2561 Amanda B. Cruser, No. 30601 Boog & Cruser, P.C. 3333 S. Wadsworth Blvd., Suite D201 Lakewood, CO 80227 303-986-5769 Fax 303-985-3297 <i>Attorneys for Defendants Vera B. Dunwody and Drayton D. Dunwody</i>	Case Number: 2010 CV 65 Div.: 1
DEFENDANTS' INTERROGATORIES TO PAUL J. VASTOLA AND SUZANNE G. NELSON LIVING TRUST, U/A DATED AUGUST 10, 2001	

Please take notice that the Plaintiff Paul J. Vastola and Suzanne G. Nelson Living Trust, u/a Dated August 10, 2001 (hereinafter the "Trust") is required to serve answers to the following interrogatories on the undersigned counsel, pursuant to C.R.C.P. 33. In responding to these discovery requests, please refer to the Instructions and Definitions set forth below.

Instructions

1. Please serve all responses to these discovery requests upon:
Victor F. Boog, Boog & Cruser, P.C.

3333 S. Wadsworth Blvd., #D201
Lakewood, Colorado 80227

2. These requests are to be deemed continuing, and responses to these discovery requests must be supplemented in accordance with C.R.C.P. 26(e).

3. For the convenience of the Court and the parties, please restate the discovery request to which each discovery response relates.

Definitions

1. "Describe" or "explain" means to set forth in detail the subject matter, and the full content, substance, and context of each communication, act, omission, or event, relevant to or concerning the subject matter of an interrogatory.

2. "Document" means any written material of whatever kind or nature, whether printed, typed, computer-generated or handwritten, as well as any photographs, computer tapes, disks or hard-drive information, computer printouts, tape recordings and graphic material, videotaped material, compilations, and any other electronically or manually maintained or recorded material.

Interrogatories

1. For each Request for Admission to the Trust which has been denied:
 - a. describe the factual basis for such denial; and
 - b. identify any document supporting such denial.

Dated this 1st day of October, 2010.

BOOG & CRUSER, P.C.
*/s/ Victor F. Boog – original signature on file
at the offices of Boog & Cruser, P.C.*

Victor F. Boog, No. 2561

CERTIFICATE OF SERVICE

I hereby certify that on the 1st day of October, 2010, a true and correct copy of the foregoing **DEFENDANTS' INTERROGATORIES TO PAUL J. VASTOLA AND SUZANNE G. NELSON LIVING TRUST, U/A DATED AUGUST 10, 2001** was sent electronically via LexisNexis File and Serve, properly addressed to:

Kirk B. Holleyman
Kirk Holleyman, P.C.
1050 – 17th St., Suite 1750
Denver, CO 80265

Frederick B. Skillern
Montgomery Little Soran & Murray PC
5445 DTC Parkway, Suite 800
Greenwood Village, CO 80111

Michael W. Jones
Monica Lester
Hall & Evans LLC
1125 – 17th St., Suite 600
Denver, CO 80202

*/s/ Bonnie J. Cowell – original signature on file
At the offices of Boog & Cruser, P.C.*
