

Exhibit G

1 SCOTT M. KENDALL, SBN 166156
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3 8788 Elk Grove Blvd., Bldg. 1, Suite I
4 Elk Grove, CA 95624-1768
5 (916) 685-7700

6 Attorney for Plaintiff PLANS, INC.

7 UNITED STATES DISTRICT COURT
8 EASTERN DISTRICT OF CALIFORNIA

| | | | |
|----|----------------------------------|---|----------------------------------|
| 9 | PLANS, Inc., |) | Case No.: CIV. S-98-0266 FCD PAN |
| 10 | Plaintiff, |) | RESPONSE TO REQUEST FOR |
| 11 | vs. |) | PRODUCTION OF DOCUMENTS |
| 12 | SACRAMENTO CITY UNIFIED SCHOOL |) | |
| 13 | DISTRICT, TWIN RIDGES ELEMENTARY |) | |
| 14 | SCHOOL DISTRICT, DOES 1-100, |) | |
| 15 | Defendant |) | |

16
17 DEMANDING PARTY: Defendants SACRAMENTO CITY UNIFIED SCHOOL DISTRICT

18 And TWIN RIDGES ELEMENTARY SCHOOL DISTRICT

19 RESPONDING PARTY: Plaintiff PLANS, INC.

20 SET NO.: Two

21
22 DOCUMENT REQUEST NO. 1:

23 Any and all documents which evidence, support, relate or refer to your responses to the
24 Interrogatories, Set No. 3 served concurrently herewith.

25 RESPONSE:

26 All responsive documents that plaintiff has in its custody and control have been previously
27 served as exhibits in its exhibit list. In addition, defendants have identified documents in responses to
28 Interrogatories Set No. 1 and 2, which are in defendants' custody and control.

JAN 15 2004

1 DOCUMENT REQUEST NO. 2:

2 Any and all documents which evidence, support, relate or refer to your responses to the Request
3 for Admissions served concurrently herewith.

4 ANSWER:

5 All responsive documents that plaintiff has in its custody and control have been previously
6 served as exhibits in its exhibit list. In addition, defendants have identified documents in responses to
7 Interrogatories Set No. 1 and 2, which are in defendants' custody and control.

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Dated: January 15, 2004

LAW OFFICES OF SCOTT M. KENDALL

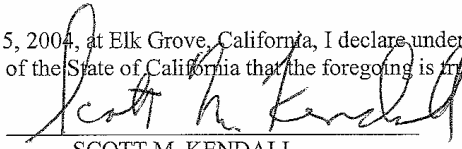


SCOTT M. KENDALL,
Attorney for Plaintiff PLANS, Inc.

VERIFICATION

I, the undersigned, certify and declare that I have read the foregoing Response to Request for Production of Documents, Set No. 2, and know its contents. I am an agent for the party to this action. The matters stated in the document described above are true of my own knowledge and belief.

Executed on January 15, 2004, at Elk Grove, California, I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

A handwritten signature in black ink, appearing to read "Scott M. Kendall", is written over a horizontal line.

SCOTT M. KENDALL

PLANS, Inc. v. Sacramento Unified School District, et al.

Case No. CIV. S-98-0266 FCD PAN

AFFIDAVIT OF SERVICE

STATE OF CALIFORNIA)
) ss.
County of Sacramento)

THE UNDERSIGNED, being sworn, says that he/she is a citizen of the United States, over 18 years of age, employed in Sacramento County, and not a party to the within action; that affiant's business address is 8788 Elk Grove Blvd., Building One, Suite I, Elk Grove, CA 95624

On **THIS DATE**, I served the original a true copy of the foregoing document(s):

RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS

on the parties involved addressed as follows:

Michelle L. Cannon
GIRARD & VINSON
1006 Fourth Street, Eighth Floor
Sacramento, CA 95814-3326

BY MAIL: I caused each envelope addressed as above, with postage thereon fully prepaid, to be sealed and placed for collection and mailing on that date following ordinary business practices of collection and processing correspondence for mailing with the United States Postal Service. Correspondence so collected and processed is deposited with the United States Postal Service that same day in the ordinary course of business.

BY PERSONAL DELIVERY: I caused each such envelope to be delivered by hand to the offices of each addressee or to the addressee above.

BY FACSIMILE: By use of a facsimile machine, I served a copy of the within document(s) on the above-interested parties at the facsimile numbers listed above. The transmission was reported as complete without error. The transmission report, which is attached to this proof of service, was properly issued by the transmitting facsimile machine.

Executed on **January 15, 2004**, at Sacramento, California.

STATE: I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

FEDERAL: I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

BOB TOTH