IN THE CIRCUIT COURT OF THE 11TH JUDICIAL CIRCUIT IN AND FOR MIAMI-DADE COUNTY, FLORIDA GENERAL JURISDICTION

Case No. 2016-014947-CA-01

LIPSCOMB, EISENBERG & BAKER, PL, a Florida professional limited liability company, and MICHAEL KEITH LIPSCOMB, an individual,

Plaintiffs,

V.

MALIBU MEDIA, LLC, a California limited liability company, PILLAR LAW GROUP, PLLC, a California professional law corporation, DIGITAL CONTENT, INC., an administratively dissolved Wyoming corporation, DATA ANALYTICS, INC., a foreign corporation,

Defendar	nts		
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<u>DEFENDANT DIGITAL CONTENT, INC.'S RESPONSE TO PLAINTIFF LIPSCOMB,</u> <u>EISENBERG & BAKER, PL'S FIRST REQUEST FOR PRODUCTION</u>

Defendant, DIGITAL CONTENT, INC. ("DCI" or "Defendant"), by and through its undersigned counsel and pursuant to Fla. R. Civ. P. 1.350, hereby gives notice of filing its Response to Plaintiff Lipscomb, Eisenberg & Baker, PL's First Request For Production ("LEB").

Respectfully submitted,

By: /s/ Heloiza Correa

HELOIZA A. CORREA Florida Bar No. 78124 E-mail: hcorr001@yahoo.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that the foregoing was served by e-mail upon those listed below on September 21, 2016.

M. Keith Lipscomb, Esq.	klipscomb@lebfirm.com
LIPSCOMB, EISENBERG & BAKER, PL	
Attorney for Plaintiffs	
	(177.1)
	/s/ Heloiza Correa
	HELOIZA A CORREA