SUPREME COURT, STATE OF COLORADO

ORIGINAL PROCEEDING IN UNAUTHORIZED PRACTICE OF LAW OFFICE OF THE PRESIDING DISCIPLINARY JUDGE

600 17th Street, Suite 510-South, Denver, Colorado 80202

Petitioner:

THE PEOPLE OF THE STATE OF COLORADO

Respondent: SUZANNE SHELL

James C. Coyle # 14970
Assistant Regulation Counsel
Attorney for Petitioner
600 17th Street, Suite 200-South
Denver, Colorado 80202

Phone Number: (303) 893-8121 x 328

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▲ COURT USE ONLY ▲

Case Number: 01SA0136

PETITIONER'S REQUEST FOR PRODUCTION OF DOCUMENTS

Attorney for Petitioner, pursuant to C.R.C.P. 34 submits the following written Request for Production of Documents to the Respondent and requests compliance therewith on or before September 18, 2001, at Dominion Plaza Building, 600 17th Street, Suite 200-South, Denver, Colorado 80202:

INSTRUCTIONS

1. Unless the context of a particular Request for Production of Documents below indicates otherwise, each Request for Production of Documents calls not only for production of those documents in the possession, custody or control of Respondent but also for the identity and location of persons having knowledge of any discoverable documents.

- 2. All of these Requests for Production of Documents are continuing. According, should new documents come to light subsequent to the filing of Respondent's original tendering of documents, Respondent should amend and supplement previously tendered documents to reflect newly-discovered documents, pursuant to C.R.C.P. 26.
- 3. If Respondent claims that any document requested is protected from discovery by a privilege, Respondent should specify the privilege and should explain the legal and factual basis for Respondent's claim of privilege.

REQUEST FOR PRODUCTION OF DOCUMENTS

- 1. Copies of all agreements evidencing financial arrangements between Suzanne Shell and any clients from January 1, 1998 to the present.
- 2. Copies of all legal forms utilized by Suzanne Shell in her handling of client matters from January 1, 1998, to the present.
- 3. Copies of all client files maintained by Suzanne Shell, opened January 1, 1998, to the present.

DATED this 15 day of August, 2001

Respectfully submitted,

James C. Coyle

Assistant Regulation Counsel

Sherry Borken

Attorney for Complainant

CERTIFICATE OF MAILING

I hereby certify that one copy of the foregoing Request for Production of Documents was placed in the United States mail, postage prepaid, this Day of August 2001, and addressed to:

Suzanne Shell 14053 Eastonville Road Elbert, CO 80106