

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 09-81085-CIV-HURLEY/HOPKINS

JONATHAN E. PERLMAN, Esq., as court
Appointed Receiver of Creative Capital
Consortium, LLC, et al.,

Plaintiff,

v.

PAULETTE THEODULE, an individual,

Defendant.

DEFENDANT'S RULE 26 INITIAL DISCLOSURES

Defendant PAULETTE THEODULE, by her undersigned counsel, hereby provides her initial disclosures as required by Federal Rules of Civil Procedure 26(a)(1)(A) and 26(a)(4) and Local Rule 26.1(a) and notes as follows:

1. The name and, if known, the address and telephone number of each individual likely to have discoverable information--along with the subjects of that information--that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Paulette Theodule c/o Lee & Amtzis, P.L.
Receipt and return of subject funds from/to George Theodule and Mario Theodule.
2. George Theodule
Delivery and receipt of subject funds to/from Paulette Theodule.
3. Mario Theodule
Delivery and receipt of subject funds to/from Paulette Theodule.

2. A copy--or a description by category and location--of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment.

1. Paulette Theodule's various bank records regarding the subject funds. George Theodule's bank records regarding the subject funds. Mario Theodule's bank records regarding the subject funds.

3. A computation of each category of damages claimed by the disclosing party--who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which each computation is based, including materials bearing on the nature and extent of injuries suffered.

N/A

4. For inspection and copying as under Federal Rule of Civil Procedure 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.

N/A

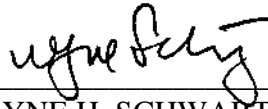
CERTIFICATE OF SERVICE

I hereby certify that on this date, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record or pro se parties identified on the attached Service List in the manner specified, either via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

CASE NO. 09-81085-CIV-HURLEY/HOPKINS

Dated: October 30, 2009
Boca Raton, Florida

Respectfully submitted,



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PAULETTE THEODULE