

COURT OF COMMON PLEAS  
CUYAHOGA COUNTY, OHIO  
PROBATE DIVISION

ARTHUR P. DUECK, et al. ) CASE NUMBER: 2012ADV179424  
 )  
 ) Plaintiffs )  
 ) JUDGE ANTHONY J. RUSSO  
v. )  
 )  
THE CLIFTON CLUB COMPANY, et al. ) **CLIFTON PARK TRUSTEE WARREN**  
 ) **COLEMAN'S ANSWERS AND**  
 ) **OBJECTIONS TO DEFENDANT JEFF**  
 ) **MANSELL'S FIRST SET OF COMBINED**  
 ) **DISCOVERY REQUESTS**  
 )  
 ) Defendants )

**INTERROGATORY NO. 1:**

How long have you been a Clifton Park Sublot Owner?

**ANSWER:**

Since 1991.

**INTERROGATORY NO. 2:**

For what years were you a Clifton Park Trustee?

**ANSWER:**

2013.

**INTERROGATORY NO. 3:**

Identify the years you or your family have been Club members.

**ANSWER:**

None.

**INTERROGATORY NO. 4:**

Identify any financial interest you or any of your family had or have in the club or its property?

**ANSWER:**

None.

**INTERROGATORY NO. 5:**

Prior to becoming a Trustee, did you state or believe at any time that the Club's members were all beneficiaries of the Trust?

**ANSWER:**

No.

**INTERROGATORY NO. 6:**

Prior to becoming a Trustee, did you maintain or state at any time that the club's members were entitled to use the beach because they were beneficiaries of the Trust?

**ANSWER:**

No.

**REQUEST FOR PRODUCTION OF DOCUMENTS**

**REQUEST NO. 1:**

Produce copies of all of your communication with lot owners, current and/or former Trustees, club directors or club members regarding the Clubs members' right to Beach access.

**ANSWER:**

No documents to produce.

**REQUEST NO. 2:**

Produce copies of all of your communication with lot owners, current and/or former Trustees, Club directors or club members regarding the Beach crowding.

**ANSWER:**

No documents to produce.

**REQUEST NO. 3:**

Produce copies of all communication with lot owners, current and/or former Trustees, Club directors or Club members regarding or referencing the Plaintiffs since 2010.

**ANSWER:**

Objection. This Request seeks information that is outside the scope of discovery.

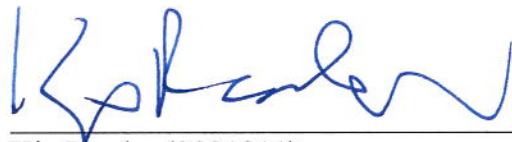
**REQUEST NO. 4:**

Produce copies of all Trust records which you have or have access to, which are not stored with the historical Trust records.

**ANSWER:**

None.

**Signed as to Objections and Responses:**



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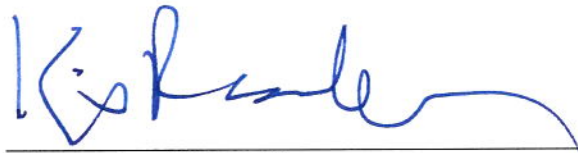
**CERTIFICATE OF SERVICE**

I hereby certify that on September 4, 2013, copies of the foregoing Clifton Park Trustee Warren Coleman's Answers and Objections to Defendant Jeff Mansell's First Set of Combined Discovery Requests were served by regular U.S. Mail upon:

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