

**IN THE CIRCUIT COURT FOR THE ELEVENTH JUDICIAL CIRCUIT IN AND FOR  
MIAMI-DADE COUNTY, FLORIDA**

KENNETH MANFREDI, SR.,  
KENNETH MANFREDI, JR.,  
and ALEXANDER LIEBSTER as Trustee  
For the Estate of Ernesto Liebster

Plaintiffs,

CASE NO. 13-024268-CA 01

v.

KOBALTEK, INC, an inactive Florida Corporation,  
MILLENIU LOCK INC. d/b/a ULTIMATE  
LOCK SYSTEMS, a Texas Corporation; DARREN  
BAYSINGER, individually; RON DANIELS,  
individually; and Joseph Titone, individually,

Defendants.

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**DEFENDANTS' KOBALTEK, INC. & DARREN BAYSINGER'S RESPONSE TO  
PLAINTIFFS' REQUEST FOR PRODUCTION**

COMES NOW Defendants Kobaltek, Inc., and Darren Baysinger, by and through undersigned counsel, and files this Response to Plaintiffs' Request for Production, and states as follows:

1. Objection – any and all documents between the attorney for Kobaltek, Inc. are privileged and confidential.
2. Objection – same
3. Objection – same
4. Objection – irrelevant and unlikely to lead to discovery of admissible evidence. Further, any pleadings in the case referred to are a matter of public record and said pleadings are equally available and accessible to all parties.
5. Objection – irrelevant and unlikely to lead to discovery of admissible evidence. Further,

any and all documents, if any, were filed as pleadings and/or exhibits in the case referred to.

6. Objection – same as #5.

7. Objection - irrelevant and unlikely to lead to discovery of admissible evidence. Further, the Plaintiffs attached said settlement agreement as Exhibit I to their Complaint, so Plaintiffs already have that document.

8. Objection – any and all documents between Joe Titone and Anthony Titone are confidential and privileged between the two attorneys.

9. Objection – same as #8.

10. Objection – same as #4 and further, undersigned counsel has not decided which documents will be presented at any hearing to be held in the future.

11. Objection – same as #10.

12. Objection – same as #10.

/s/ Joe Titone

Joe Titone  
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/s/ Steve Mankodi

Steve Mankodi  
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[REDACTED]

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the foregoing was served on June 12, 2014 upon  
George C. Paladis, Esq., & Michael J. Reppas, Esq., Law Office of Michael J. Reppas, ■■■, ■■■,  
7850 NW 146<sup>TH</sup> Street, Suite 501, Miami Lakes, Florida 33016.