

STATE OF OKLAHOMA
DEPARTMENT OF SECURITIES
THE FIRST NATIONAL CENTER
120 NORTH ROBINSON, SUITE 860
OKLAHOMA CITY, OKLAHOMA 73102



In the Matter of:
Jim J. Hammons,

Respondent.

ODS File 14-017

**RESPONDENT'S ANSWERS AND OBJECTIONS TO THE DEPARTMENT'S FIRST
REQUEST FOR PRODUCTION OF DOCUMENTS**

Comes now Respondent Jim Hammons, by and through his counsel of record, and for his Objections and Responses to the Department's First Request for Production of Documents, objects thereto to the extent they call for the disclosure of information which is protected from discovery and/or privileged on any ground, including but not limited to (a) the attorney client privilege; (b) the work product doctrine; (c) the trial preparation exclusions; (d) settlement negotiations exclusion; (e) any other recognized privilege; and (f) the scope of discovery under the Rules of the Oklahoma Securities Commission and/or the Oklahoma Rules of Civil Procedure.

Respondent concedes neither the relevancy nor the admissibility of any information provided by responding to a specific discovery request. Any production of information or documents does not constitute an admission that such information is probative of any particular issue in this matter.

As additional information is discovered, analyzed, or made available during discovery in the course of these proceedings, Respondent reserves the right to supplement and/or revise these objections and responses. Respondent reserves further objections to the admissibility of the documents produced.

Subject to the foregoing objections and conditions and subject to the specific additional

objections made with respect to each response, Respondent submits the following responses:

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1: All documents relating to a transaction or potential transaction between or among you, Reaction Force, LLC, Executive Black Belt Training Centers, LLC, and/or The Center.

RESPONSE TO REQUEST NO. 1: Objection. This request is overly broad, burdensome, oppressive, seeks information which is not relevant nor is it reasonably calculated to lead to the discovery of admissible evidence. Further objection is made as this request seeks attorney-client privileged information. Without waiving such objection, please see the attached.

REQUEST FOR PRODUCTION NO. 2: All documents authorizing you, or relating to an authorization for you, to act on behalf of Executive Black Belt Training Centers, LLC.

RESPONSE TO REQUEST NO. 2: Please see the attached.

REQUEST FOR PRODUCTION NO. 3: All documents authorizing you, or relating to an authorization for you, to act on behalf of Reaction Force, LLC.

RESPONSE TO REQUEST NO. 3: None.

REQUEST FOR PRODUCTION NO. 4: All documents relating to communications of any kind between you and Patricia Reynolds concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

RESPONSE TO REQUEST NO. 4: Objection. This request is overly broad, burdensome, oppressive, seeks information which is not relevant nor is it reasonably calculated to lead to the discovery of admissible evidence. Further objection is made as this request seeks attorney-client privileged information. Without waiving such objection, please see the attached.

REQUEST FOR PRODUCTION NO. 5: All documents relating to communications of any kind between or among you, Mike Metzger, Cody Pepper, Frank Silverman, and/or any other representative of The Center concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

RESPONSE TO REQUEST NO.5: Please see the attached.

REQUEST FOR PRODUCTION NO. 6: All documents relating to communications of any kind between you and Greg Cooper concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

RESPONSE TO REQUEST NO. 6: Please see the attached.

REQUEST FOR PRODUCTION NO. 7: All documents relating to communications of any kind between you and Thomas Jacobs concerning Reaction Force, LLC, Executive Black Belt Training Centers, LLC, The Center, and/or the purchase of a martial arts school or franchise.

RESPONSE TO REQUEST NO. 7: Please see the attached.

REQUEST FOR PRODUCTION NO. 8: All documents that have not already been produced that relate to Reaction Force, LLC, Executive Black Belt Training Centers, LLC, and/or The Center.

RESPONSE TO REQUEST NO. 8: Objection. This request is overly broad, burdensome, oppressive, seeks information which is not relevant nor is it reasonably calculated to lead to the discovery of admissible evidence. Further objection is made as this request seeks attorney-client privileged information. Without waiving such objection, please see the attached.

Respectfully submitted,



P.R. Tirrell, OBA #21555

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ATTORNEY FOR RESPONDENT

CERTIFICATE OF SERVICE

This is to certify that on October 2, 2014 a true and correct copy of the above and foregoing *Respondent's Answers and Objections to the Department's First Request for Production of Documents* was served via U.S. Mail postage prepaid upon:

Terra Bonnell, OBA #20838
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P.R. Tirrell

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HAMMONS
14.017

For your
this CD
is called
the recording

From Denton Cow Farm
925 W 5th St (50)
MUSTANG OK
73024

Handble
with care



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To Thomas Bonwell
Enforcement Attorney
OK Dept of Security
120 N Robinson, Suite 800
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73102

