

IN THE CIRCUIT COURT OF THE 17th
JUDICIAL CIRCUIT IN AND FOR
BROWARD COUNTY, FLORIDA

GENERAL JURISDICTION DIVISION

CASE NO.: CACE-17-013936

ADD HELIUM, LLC
a Delaware Limited Liability Corporation
and PETER SOTIS, individually,

Plaintiffs,

vs.

INTERNATIONAL ASSOCIATION OF NITROX
DIVERS, INC.,
a Florida Corporation,

Defendants.

PLAINTIFFS' FIRST REQUEST FOR PRODUCTION

Plaintiffs, ADD HELIUM, LLC (hereinafter referred to as "ADD HELIUM") and PETER SOTIS (hereinafter referred to as "SOTIS"), by and through their undersigned counsel hereby file this, their First Request for Production to Defendant, INTERNATIONAL ASSOCIATION OF NITROX DIVERS, INC as follows:

1. Each and every document you reviewed in making the decision to terminate the teaching credentials for Add Helium.
2. Each and every document you reviewed in making the decision to terminate the teaching credentials for Peter Sotis.
3. Each and every document you relied upon in making the decision to terminate the teaching credentials for Add Helium.