

DEFENDANT EVA JACKSON'S RESPONSE TO PLAINTIFFS' SECOND REQUESTS FOR PRODUCTION

1. All documents evidencing a recommendation from an employee or representative of HISD to approve RHJ-JOC, Inc. as a JOC contractor.

RESPONSE:

Defendant objects to this request as it is overly broad. Subject to and without waiving the foregoing, Defendant has no responsive documents.

2. All documents evidencing the business consulting services you received from JM Clay and Associates or Joyce Moss Clay in exchange for consulting fees.

RESPONSE:

Defendant objects to this request as it is overly broad. Subject to and without waiving the foregoing, Defendant has no responsive documents.

3. Copies of all checks given to JM Clay and Associates or Joyce Moss Clay.

RESPONSE:

Defendant has no responsive documents.

4. All documents evidencing the business consulting services JM Clay and Associates or Joyce Moss Clay provided to you or Marshall & Associates of Houston.

RESPONSE:

Defendant has no responsive documents.

5. All documents evidencing receipt of payments to JM Clay and Associates or Joyce Moss Clay for her business consulting services to you or any company you own.

RESPONSE:

Defendant has no responsive documents.

6. All IRS 1099 forms you have sent to Joyce Moss Clay or JM Clay and Associates.