

# EXHIBIT A

**Page 31 from 708-page document dump showing Delgado contradiction**

## Missing Discovery Items - Responses

### Missing Discovery Items - Case No. 2025-CH-05527

#### DOCUMENT REQUESTS - Missing Items

**Request #3:** Communications with Timothy Lenihan, Yalea Baughman, Michael Sheets, and any other person(s) regarding occupancy, rental, or payment for use of any property under your control

- Status: Claims "no documents in possession"
- Issue: Impossible - 3+ years of "cost sharing" with 3 separate people would generate hundreds of communications
- Need: **All texts, emails, Venmo notes about utilities, groceries, payments MSC conferring with Kyle on 8/25--Kyle to tender by 8/29.**

**Request #5:** Water Damage Documentation

- Status: Claims "no documents in possession"
- Issue: Admits taking photos on January 6, 2025
- Need: **Photos, videos, contractor communications, repair estimates Kyle provided in the Google doc for MSC to supplement.**

**Request #6:** Contractor Communications

- Status: Claims "no documents in possession"
- Issue: Admits Miguel Delgado inspected property and communicated in April 2025
- Kyle has not contacted anyone and does not know a Miguel Delgado.

- Need: **Texts and calls with Delgado, inspection reports**

**Request #7:** Vehicle Purchase Documents

- Status: Refused - claims "undue burden"
- Issue: Admits buying \$18,000 Toyota Prius in October 2023
- Need: **Purchase receipt, financing documents (single document)**
- Standing on our objection as unrelated to this action.**

**Request #8:** Condo Closing Documents

- Status: NO RESPONSE PROVIDED
- Issue: Admits sale on October 11, 2023 for \$76,000 proceeds
- Need: **HUD-1/Closing statement showing proceeds distribution**
- Standing on our objection as unrelated to this action.**

**Request #11:** Real Estate License Materials

- Status: Refused - claims "undue burden"
- Issue: Licensed agent should have professional standards materials
- Need: **License, Ethics training, and fiduciary duty materials**
- Standing on our objection as unrelated to this action.**

**Request #13:** Non-Privileged Attorney Communications

- Status: Refused - claims "undue burden"
- Issue: Should have non-privileged communications about property
- Need: **Non-privileged emails/texts about the dispute**
- There are none.**