

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

GUADALUPE L. GARCIA, JR., et al.,)	
)	
Plaintiffs,)	
)	
v.)	Civil Action No. 1:00CVO2445
)	Judge Robertson
ANN M. VENEMAN, Secretary of the)	
United States Department of Agriculture,)	
)	
Defendant.)	

**PLAINTIFFS' FIRST SET OF REQUESTS
FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiffs direct the following Plaintiffs First Set Of Requests For Production Of Documents to defendant Ann Veneman, Secretary of the United States Department of Agriculture. By order of the Court, defendant is directed to serve her objections to these requests by delivering the same to the undersigned counsel at the offices of Howrey Simon Arnold & White, 1299 Pennsylvania Avenue, N.W., Washington, D.C. 20004 on or before February 14, 2003. To the extent that the defendant does not object to any request or portion thereof, plaintiffs request that defendant produce responsive documents by delivering the same to the undersigned counsel at the aforementioned address on or before February 24, 2003.

DEFINITIONS

1. As used in these requests, the words "document" or "documents" refer to all materials and tangible objects conveying or carrying spoken, visual or literal substances and, without limitation, shall include the original and any nonidentical copy, regardless of

origin or location, of the following: papers, correspondence, records, tables, charts, analyses, graphs, schedules, reports, memoranda, journals, notes, logs, calendars, diaries, appointment books, minutes, notes and records of meetings, letters, telegrams, messages, studies, drafts, books, booklets, periodicals, magazines, newspapers, advertisements, brochures, instructions, other communications (including, but not limited to, inter- and intra-office communications), contracts, books of account, orders, invoices, statements, checks, bills, files, vouchers, notebooks, scrapbooks, data sheets, electronic, mechanical or electrical records or representations of any kind (including, but not limited to, information recorded on computer tapes, disks, or other media), data processing cards, computer printouts, photographs, photographic negatives, motion picture negatives and prints, phono-records, tape recordings (whether audio, video, or digital), wire recordings, drawings, maps, forms catalogues, manuals, blueprints, tracings, tabulations, or other papers similar to the foregoing, including all drafts, revisions, and outlines of any such documents (whether or not actually used).

2. As used in these requests, the words “you,” “your,” “yourself” and the abbreviation “USDA” refer to defendant Ann M. Veneman and each of her predecessor secretaries of the Department of Agriculture since January 1, 1981, her and their agents, attorneys, representatives, and anyone acting on her or their behalf, including, but not limited to, any official, employee, agent, consultant, office, agency, administration, division or entity of any sort, no matter where located, working on behalf of the United States Department of Agriculture in connection with the administration of farm credit or benefit programs or civil rights enforcement or investigation, including, but not limited to, discrimination complaints by farmers and ranchers in connection with farm credit or benefit programs.

3. As used in these requests, the word “person” includes a natural person, corporation, partnership, proprietorship, firm, association and every other type of organization or entity.
4. The term “relevant county” as used in these requests refers to the counties listed in Appendix B to these requests.
5. The term “relevant time period” means the periods from January 1, 1981 to December 31, 1996 and from October 13, 1998 to the present.
6. As used in these requests, the words “relating to,” “refer to,” “relate to,” “concerning” and “concern,” when used in connection with a specific subject mean constituting, comprising, dealing with, commenting upon, describing, summarizing, analyzing, explaining, detailing, outlining, defining, interpreting, mentioning, bearing on, pertaining to, reflecting or being in any way logically or factually connected, in whole or in part, with that subject.
7. “And” and “or” shall be construed disjunctively or conjunctively, and the singular form of a word shall be interpreted in the plural and the present tense shall include the past tense and vice versa, as necessary in order to bring within the scope of any request all information that might otherwise be construed to be outside its scope.
8. “Complaint” refers to the Second Amended Complaint that plaintiffs filed in the above-captioned action.
9. The terms “Hispanic farmer” or “Hispanic rancher” shall mean an American farmer or rancher of Spanish or Latin American origin or descent and encompass any and all definitions of those terms used by the USDA in connection with any official recordkeeping function.

10. The terms “white male farmer” or “white male rancher” shall mean all farmers and ranchers who identify themselves as white or Caucasian males in connection with any farm credit or benefit program application process and encompass any and all definitions of those terms used by the USDA in connection with any official recordkeeping function.
11. The term “Agency” shall mean the Farm Service Agency (FSA) or its predecessor agency Farmers Home Administration (FmHA).

INSTRUCTIONS

1. These requests call for the production of all responsive documents located, within your possession, custody or control, no matter where such documents are.
2. In responding to these requests, please organize and label the documents so as to indicate the requests to which the documents are responsive.
3. If you assert a privilege or work product or other immunity as the ground for your refusal to produce any responsive document, please explain the specific nature of and basis for each claim of privilege or work product or other immunity. With respect to any such document, please provide a description of the document, including the author, recipient and subject matter, sufficient to assess the merits of the claimed privilege.
4. If you object to any request for the production of documents, please state the grounds of the objection with sufficient specificity to permit determination of the basis for such objection.

5. Each request shall be deemed continuing and to require amended and supplemental responses if you obtain further responsive documents between the time that your initial responses are served upon plaintiff and the time of final judgment.
6. With respect to any request contained herein, if you cannot respond fully, respond to it to the fullest extent possible and explain why you cannot produce all of the responsive documents.
7. Each document is to be produced, with all nonidentical copies and drafts thereof, in its entirety without redaction.
8. Unless otherwise expressly stated, the time period in question is from January 1, 1981 to December 31, 1996 and from October 13, 1998 to the present.

REQUESTS

1. Produce all documents produced by you in response to document requests 2, 5, 6, 7, 10, 13 and 14 served upon you by the plaintiffs in Love v. Veneman, Civil Action No. 1:00CV02502.
2. Produce all documents identified in response to any interrogatory directed to you by plaintiffs or referred to or reviewed by you in connection with responding to any interrogatory directed to you by plaintiffs in this proceeding.
3. Produce all documents relating to or referring to each individual listed in Appendix A to these requests, including but not limited to, the loan and benefit files of each such individual and for each such individual with respect to each instance in which he or she applied for farm credit or to participate in a non-credit benefit program, produce the files of every white farmer within the county that applied for farm credit or to participate in a non-credit farm benefit program during the same year as did the individual listed in Appendix A.

4. Produce all documents, including any Agency running records or county committee minutes, that reveal or would permit one to determine for each relevant county in each year during the relevant time period, the number of Hispanic farmers and Hispanic ranchers who:

- a. requested applications for USDA loan programs;
- b. received applications for USDA loan programs;
- c. applied for USDA loans;
- d. received USDA loans;
- e. were rejected for USDA loans;
- f. paid off USDA loans;
- g. requested servicing of USDA loans;
- h. were permitted to have their loans serviced; or
- i. were denied servicing for their USDA loans.

5. With respect to each Hispanic farmer or Hispanic rancher who received a USDA loan, produce all documents that reveal or would permit one to determine for each relevant county in each year during the relevant time period:

- a. the total number of days between the time the loan application was received by the farmer or rancher and the date when the farmer was notified that the loan was approved;
- b. the number of days between the time the loan application was received by the farmer or rancher and the date on which the completed application was submitted to USDA;
- c. the number of days between the time the completed application was submitted to USDA and the date on which the farmer was notified that the loan was approved;
- d. the dollar amount of the loan request and the actual dollar amount of the approved loan; and
- e. the number of approved loans that were placed in supervised accounts or otherwise subject to supervision by USDA officials.

6. Produce all documents that reveal or would permit one to determine for each year during the relevant time period and for each relevant county, the number of Hispanic farmers and Hispanic ranchers who:

- a. received an application to participate in any USDA non-credit farm benefit program;
- b. participated in any such USDA farm benefit program; or
- c. were rejected for participation in such programs.

7. For each relevant county, produce all documents that record or would permit one to determine for each year during the relevant time period, the number of white male farmers and ranchers who:

- a. received applications for USDA loan programs;
- b. applied for USDA loans;
- c. received USDA loans;
- d. were rejected for USDA loans;
- e. paid off USDA loans;
- f. requested servicing for USDA loans;
- g. were permitted to have their loans serviced; or
- h. were denied servicing of their USDA loans.

8. For each relevant county, produce all documents that reveal or would permit one to determine for each year during the relevant time period for each white farmer or white rancher in such county who received a USDA loan:

- a. the total number of days between the time the loan application was received by the farmer or rancher and the date when the farmer was notified that the loan was approved;
- b. the number of days between the time the loan application was received by the farmer or rancher and the date which the completed application was submitted to USDA;

- c. the number of days between the time the completed application was submitted to USDA and the date on which the farmer was notified that the loan was approved;
- d. the dollar amount of the loan request and the actual dollar amount of the approved loan; and
- e. the number of approved loans that were placed in supervised accounts or otherwise subject to supervision by USDA officials.

9. With respect to each relevant county, produce all documents, including any Agency running records or county committee minutes, that reveal or would permit one to determine for each year during the relevant time period, the number of white male farmers and white male ranchers who:

- a. received applications for USDA farm benefit programs;
- b. participated in any such USDA programs; or
- c. were rejected for participation in such programs.

10. With respect to each relevant county, produce the county office's sign-in sheets and logs for issuing credit and benefit applications for each year during the relevant time period.

11. Produce all documents relating to, referring to or concerning discrimination against Hispanic farmers in connection with their participation in USDA loan or farm benefit programs for each year during the relevant time period.

12. Produce all documents relating to, referring to or concerning USDA policy, procedure, practice or custom with respect to processing applications for farm credit or participate in farm benefit programs for each year during the relevant time period.

13. Produce all documents that refer to, relate to or concern any audit, investigation or study, white paper or review conducted by any entity, including, but not limited to, you, the USDA or any subdivision thereof, the United States Congress and any committee or subcommittee thereof, the General Accounting Office, the United States Commission on Civil Rights and any consultant vendor hired by the USDA, into allegations of discrimination by

USDA against any Hispanic farmer or Hispanic rancher concerning the administration and delivery of farm credit and non-credit farm benefit programs.

14. Produce all documents showing or constituting communications with or pronouncements to Hispanic farmers and ranchers describing in Spanish USDA farm credit and non-credit farm benefit programs.

15. Produce all operational manuals related to the procedure of processing civil rights complaints regarding the administration and delivery of farm credit and benefit services.

16. Produce all documents, including, but not limited to, all databases from or maintained by the USDA's Office of Civil Rights concerning all complaints filed by Hispanic farmers or Hispanic ranchers during the relevant time period.

17. With respect to each relevant county, produce all documents referring to, relating to or concerning eligibility determinations with respect to Hispanic and white male farmers applying for USDA farm loans or non-credit farm benefits made by: (a) the county committee and the county loan manager during the period January 1, 1981 to 1999; and (b) the county loan manager from 1999 to present.

18. For each relevant county, produce all documents referring to the distribution of funds in connection with the farm credit and non-credit farm benefit programs for each year during the relevant time period.

19. Produce all personnel files of employees against whom any Hispanic farmer or Hispanic rancher has filed a discrimination complaint.

20. For each relevant county, produce all records and/or lists containing the names of Hispanic farmers.

21. Produce all documents (including any issued by the Department of Justice or other government entities), referring to or concerning the processing, settlement, adjudication, payment, or other resolution by USDA of any civil rights complaints filed by Hispanic farmers and ranchers.

22. Produce all documents referring, relating or reflecting the identities, experience, qualifications and training of USDA representatives who investigated or worked on discrimination complaints filed by Hispanic farmers and ranchers in each relevant county.

23. Produce all documents collected by, retrieved by or given to Anthony Califa, a.k.a. Antonio Califa, Team Leader of the Statute of Limitations Office/Program Adjudication Division, USDA Office of Civil Rights, or anyone working with him in connection with any investigation undertaken by Mr. Califa or anyone working with him concerning discrimination claims by Hispanic farmers or ranchers, and any memoranda, reports or notes prepared by Mr. Califa or anyone working on his behalf in connection with the investigation of such claims.

24. To the extent not produced in response to the foregoing requests, produce all documents that discuss, refer to or relate to the plaintiffs listed in Appendix A to this request.

25. To the extent not produced in response to the foregoing requests, produce all documents that discuss, refer to or relate to the ability of Hispanic farmers and ranchers to obtain USDA farm credit or to participate in non-credit farm benefit programs including, but not limited to, any documents that compare the ability of Hispanic farmers and ranchers to obtain USDA farm credit or to participate in non-credit farm benefit programs with that of white male farmers or farmers and ranchers of other racial or ethnic origins.

25. For each month of the relevant time period, produce all monthly management summaries with respect to all farm credit and non-credit farm benefit programs including, but not limited to, “FSA-Farm Loan Programs Monthly Management Summary” and any comparable or similar report prepared by FmHA, and “Accelerated Loans To Minority and Women Borrowers – ACL, CAP, FAP” and any comparable or similar report prepared by FmHa, that compare or permit one to compare loan performance or participation in farm credit and non-credit farm benefit programs on the basis of race, ethnicity or gender.

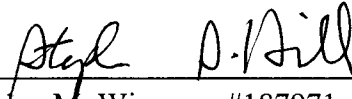
26. Produce all documents that discuss, reflect, refer to or relate to any decision with respect to what information would be included in USDA’s centralized databases with respect to farm credit information and non-credit farm benefit program information.

27. Produce all documents that discuss, reflect, refer to or relate to any efforts by USDA or discussion within USDA to maintain its records with respect to farm credit and non-credit benefit programs, including, but not limited to, any centralized databases, in such a way as to permit one to audit those records to determine if USDA is complying with applicable civil rights laws, including, but not limited to, the Equal Credit Opportunity Act, 15 U.S.C. §§ 1191 *et. Seq.*, in its lending practices and in the operation of its non-credit farm benefit programs.

287. Produce all documents that discuss, reflect, refer to or relate to any action taken or considered by USDA to preserve documents in light of Congress' having enacted a statute extending the statute of limitations with respect to certain claims arising between January 1, 1981 and December 31, 1996 pursuant to the Equal Credit Opportunity Act, 15 U.S.C. §§ 1691 *et. seq.*

29. Produce all documents that discuss, reflect, refer to or relate to any instruction or action of any sort to insure the preservation of possibly relevant documents and tangible things once USDA became aware of the filing of this lawsuit.

Respectfully submitted,



Of Counsel:

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Washington, DC 2007
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Attorneys for Plaintiffs
GUADALUPE L. GARCIA, JR., et al.

Date: January 21, 2003

APPENDIX A

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Acosta, Alberto	P.O. Box 333 Animas, NM, 88020	Dona Ana County Las Cruces FSA office
Alvarez, Alfredo	9747 Southside Road El Paso, TX 79927	El Paso County FSA office and Fort Stockton County FSA office
Alvarez, Jimmy and Elizabeth	R.R. Box 18, Salem, NM 87941	Dona Ana County Las Cruces FmHA office
Alvarez, Ruben	7336 S. Alta Avenue Reedley, CA 93654	Tulare County Visalia FSA Office
Amezquita, Salvador	24795 El Rosario St. Salinas, CA 93906	Monterey County Salinas FSA Office
Arevalo, Gustavo	228 Tapadero St. Salinas, CA 93906	Monterey County Salinas FSA Office
Arevalo, Ricardo	228 Tapadero St. Salinas, CA 93906	Monterey County Salinas FSA Office
Atayde, David	P.O. Box 9288 Salinas, CA 93915	Monterey County Salinas FSA Office
Atayde, Juan	598 Mariposa Street Salinas, CA 93906	Monterey County Salinas FSA Office
Banuelos, Rigoberto	6412 S. Walnut Fresno, CA 93706	Fresno County Fresno FSA office
Bernal, Efrain	490 Pini Road Watsonville, CA	Monterey County Salinas FSA Office
Camargo, Alejamdro	1478 E. El Dorado Reedley, CA 93654	Fresno County Fresno FSA office
Camargo, Jose	1329 E. El Dorado Reedley, CA 93654	Fresno County Fresno FSA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Cantu , Manuel N.	P.O. Box 973 San Juan, TX 78589	Hidalgo County Edinburg FSA office
Ceja , Guillermo	2311 Main Street #33 Salinas, CA 93906	Monterey County Salinas FSA Office
Chaidez , Jose & Flora C.	6763 S. Cherry Avenue Fresno, CA 93725	Fresno County Fresno FSA office
Chavarria , Larry & Robert	P.O. Box 386 Lemoore, CA 93245	Kings County Hanford FSA office
Cisneros , Juan J.	P.O. Box 704 Questa, NM 87556	Taos County FSA office, Espanola FSA office, Estancis FSA office
Contreras Alex	390 Duhon Drive Sour Lake, TX 77659	Memphis Texas Hall County FSA office
Contreras Joe	P.O. Box 912 Childress, TX 79201	Memphis Texas Hall County FSA office
Contreras Louis	P.O. Box 912 Childress, TX 79201	Memphis Texas Hall County FSA office
Cornejo , Valentin	153 Live Oak Road Watsonville, CA 95076	Monterey County Salinas FSA Office
Davis , Tyn	P.O. Box 751 Ft. Hancock, TX 79839	El Paso County FSA office
Encinias , Oracio (Rusky)	3638 QR 63.8 Tucumcari, NM 88401	Quay County Tucumcari FmHA office
Espindola , Antonio	41650 Road 68 Diniba, CA 93618	Monterey County Salinas FSA Office
Espinosa , Richard	8150 S. Walnut Fresno, CA 93706	Fresno County Fresno FmHA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Flores, Edward & Norma	P.O. Box 963 Chimayo, NM 87522	Dona Ana County Las Cruces FmHA office
Flores, Hector T.	7535 Adobe Road El Paso TX 79915	El Paso County FSA office
Flores, Joe A.	P.O. Box 2771 Fresno, CA 93745	Fresno County Fresno FmHA office
Flores, Juan	7535 Adobe Road El Paso TX 79915	El Paso County FSA office
Flores, Patrick	Rt-2 Box 61 Pecos, NM 87552	Dona Ana County Las Cruces FSA office
Flores, Salvador T.	P.O. Box 510 Fabens, TX 79838	El Paso County FSA office
Fuentes, Jaime	13665 E. Gettysberg Sanger, CA 93657	Fresno County Fresno FSA office
Galvan, Jose Luis	P.O. Box 130 Fort Hancock, TX 79839	Ft. Stockton FSA office
Garcia, Albert	470 County Road 44 Muleshoe, TX 79347	Bailey County Muleshoe FmHA office
Garcia, Gilbert L.	9300 N Hwy 85 Las Cruces, NM 88005	Dona Ana County Las Cruces FSA office
Garcia, Guadalupe Jr. & Margarita	9303 North Dona Ana Rd Las Cruces, NM 88007	Dona Ana County Las Cruces FSA office
Garcilazo, Ramon	333 Park Side Ct. Greenfield, CA 93927	Monterey County Salinas FSA Office
Garza, Homer	P.O. Box 34 Mesquite, NM 88048	Dona Ana County Las Cruces FSA office
Garza, Joanne	13401 Mulberry Fresno, CA 93648	Fresno County Fresno FSA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Garza, Rodolfo, Beatrice	106 North Avenue, C Crystal City, TX 78839	Dimmit County Carrizo Springs FmHA office
Gutierrez, Jose R.	P.O. Box 21 Maple, TX 79344	Bailey County Muleshoe FSA office
Hinojosa, David L. and Olivia A.	1215 Boyer Walla Walla, WA 99362	Dona Ana County Las Cruces FmHA office
Iriarte, Norberto	2035 S. Whitney Fresno, CA 93702	Fresno County Fresno FSA Office
Jauregui, Albert	6 Newlyn St. Salinas, CA 93906	Monterey County Salinas FSA Office
Jimenez, Tony & Patricia	3671 Old Toll Road Cathey's Valley, CA 95306	Mariposa County Merced FSA Office
Juarez Maloney, Juana	P.O. Box 5273 San Angelo, TX 76902	Tom Green County San Angelo FSA Office
Ledesma, Javier	P.O. Box 941 Hollister, CA 95024	Monterey County Salinas FmHA office
Linares, Dora	4822 S. temperance Fowler, CA 93625	Fresno County Fresno FSA Office
Llanez, Richard and Mary Helen	1620 W. O'Hara Rd. Anthony, NM 88021	Dona Ana County Las Cruces FSA office
Lopez, Eduardo R.	10306 St. Hwy. 104 Tucumcari, NM 88401	Quay County Tucumcari FmHA office
Mancillas, Reyes	7299 S. East Fresno, CA 93725	Fresno County Fresno FmHA office
Martinez, Jose	5229 W. Robinson Ave Fresno, CA 93722	Fresno County Fresno FSA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Martinez, Melecio	c/o Edith Lerma 119 East Bolivar Salinas, CA 93906	Monterey County Salinas FSA Office
Medina, Albert	10845 S. Walnut Fresno, CA 95706	Fresno County Fresno FmHA Office
Medina, Angel	86 Hidden Valley Road Royal Oaks, CA 95076	Monterey County Salinas FSA office
Medina, Ismael	1861 McRae Las Cruces, NM 88001	Dona Ana County Las Cruces FSA office
Mendoza, Esrael H.	P.O. Box 944 Willcox, AZ 85644	Grant County Silver City (NM) FmHA office, Luna County Deming FmHA office
Mendoza, Ysidoro F.	P.O. Box 494 Willcox, AZ 85644	Grant County Silver City (NM) FmHA office
Moralez, Gloria	P.O. Box 414 Fresno, CA 93708	Fresno County Fresno FSA Office
Moreno, Rita M. (formerly Rita Alberts)	86 Hidden Valley Royal Oaks, CA 95076	Monterey County Salinas FSA offices
Munoz, Ramon	1008 Atlantic Salinas, CA	Monterey County Salinas FSA Office
Myers, Sonja Madera	1356 CRS Clovis, NM 88101	Curry County Clovis FSA office
Oaxaca, Demetria	27345 San Carlos Madera, CA 93637	Madera County FSA office
Oaxaca, John C.	629 N. College Avenue Fresno, CA 93728	Fresno County Fresno FSA Office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Orozco, Florencio	2073 Santa Rita Street #15 Salinas, CA 93906	Monterey County Salinas FSA office
Ortega, Alberto	Rt. 3 Box 111 Mercedes, TX 78570	Mercedes County Edinburg FSA office
Ortega, Rene	Rt. 3 Box 108-M Mercedes, TX 78570	Mercedes County Edinburg FSA office
Ortega, Robert Jr.	1802 W. Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
Ortega, Roberto	1802 W. Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
Pairis, Ramon	2417 E. Four Creeks Ct. Visalia, CA 93292	Tulare County Visalia FmHA Office
Panduro, Henry	5299 W. Robinson Ave Fresno, CA 93722	Fresno County Fresno FSA office
Provencio, Edward	P.O. Box 38 Chamberino, NM 88027	Dona Ana County Las Cruces FSA office
Provencio, George	2208 West Washington Anthony, NM 88021	Dona Ana County Las Cruces FSA office
Puentes, Esvirion	6134 West Belmont Ave. Fresno, CA 93722	Fresno County Fresno FSA Office
Ramon, Greg C.	220 SE 6th Street Morton, TX 79346	Cochran County Morton FSA office
Rejino, Lupe	Rt. 3 Box 285 Muleshoe, TX 79347	Bailey County Muleshoe FSA office
Rodriguez, Ruperto R.	Rodriguez Brothers, Inc. 11618 Pompano Lane Houston, TX 77072	Frio County Pearsall FSA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Ruiz, Elias	7344 S. Cornelia Fresno, CA 93706	Fresno County Fresno FSA office
Ruiz, Stella	5782 S. Elm Avenue Fresno, CA 93706	Fresno County Fresno FSA office
Ruiz, Stella & Terry For the Estate of Ignacio Ruiz	5782 S. Elm Avenue Fresno, CA 93706	Fresno County Fresno FSA office
Salinas, Romeo	P.O. Box 176 Smyer, TX 79367	Hockley County Levelland FmHA, Lubbock County FSA office
Salinas, Sr., Roberto	P.O. Box 176 Smyer, TX 79367	Hockley County Levelland FmHA, Lubbock County FSA office
Tellez, Jose A.	1151 M Street Reedley, CA 93654	Fresno County Fresno FmHA Office
Valdez II, Dionicio	Route 6 Box 282-7 Weslaco, TX 78596	Hidalgo County Edinburg FSA Office
Valdez, Erasmo	RR 3 Box 226A Mercedes, TX 78570	Willacy County Raymondville FSA office
Vasquez, Arturo & Berta	P.O. Box 485 Fabens, TX 79838	El Paso County FSA office

GARCIA NAMED PLAINTIFFS

NAME	ADDRESS	FSA Office
Vasquez, Enrique	7671 S. Orange Fresno, CA 93725	Fresno County Fresno FmHA Office
Vasquez, Jess R.	1626 E. Floral Avenue Fresno, CA 93725	Fresno County Fresno FmHA Office
Vasquez, Lydia	920 E. South Ave Fresno, CA 93725	Fresno County Fresno FmHA Office
Vasquez, Paul	920 E. South Ave Fresno, CA 93725	Fresno County Fresno FmHA Office
Vasquez, Rodolfo (deceased) and Delia	P.O. Box 942 Fabens, TX 79838	El Paso County FSA office
Vasquez, Tommy G.	4636 W. American Fresno, CA 93706	Fresno County Fresno FmHA Office
Velarde, Frank	1505 E. Main Trinidad, CO 81082	Las Animas County Trinidad FSA office

APPENDIX B

APPENDIX B

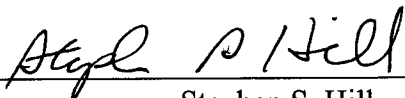
COUNTY OFFICES

ARIZONA	CALIFORNIA	COLORADO	FLORIDA	MONTANA	NEW MEXICO	TEXAS	WASHINGTON
<u>Counties</u> <ul style="list-style-type: none"> • Cochise 	<u>Counties</u> <ul style="list-style-type: none"> • Madera • Martinez • Modesto • San Benito 	<u>Counties</u> <ul style="list-style-type: none"> • Alamosa • Otero • Pueblo • Weld 	<u>Counties</u> <ul style="list-style-type: none"> • Hardie • Hillsborough • Miami Dade • Polk 	<u>Counties</u> <ul style="list-style-type: none"> • Richland 	<u>Counties</u> <ul style="list-style-type: none"> • Chaves • Hildalgo • San Miguel • Union 	<u>Counties</u> <ul style="list-style-type: none"> • Houston • Kinney • Maverick • Milam • Val Verde 	<u>Counties</u> <ul style="list-style-type: none"> • Adams • Franklin • Grant • Yakima

CERTIFICATE OF SERVICE

I hereby certify that on this 21st day of January 2003, I caused a true copy of the foregoing Plaintiffs' First Set of Requests For Production of Documents to be served upon defendant by causing the same to be hand-delivered to:

Michael Sitcov, Esq.
Lisa Olson, Esq.
UNITED STATES DEPARTMENT OF JUSTICE
Civil Division
20 Massachusetts Ave., N.W.
Room 6118
Washington, DC 20530



Stephen S. Hill