

APPENDIX A

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

In re Application of:	)	
	)	
H.M.G., <i>a natural person and</i>	)	
<i>citizen of the Republic of Austria,</i>	)	Case No. _____
	)	
Applicant.	)	
	)	

**PRODUCTION OF DOCUMENTS**

Glock, Inc., Glock Professional, Inc., and Consult Invest, Inc. shall each produce copies of the documents described herein no later than thirty (30) days from service upon them of the foregoing Order, at the offices of Applicant's counsel or at such other place as the parties may agree.<sup>1</sup>

**DOCUMENTS TO BE PRODUCED**

1. All monthly, quarterly, and annual financial statements of the Company for the Relevant Time Period, whether audited or unaudited, including balance sheets, income statements, profit-and-loss statements, statements of cash flow, and accompanying notes and auditor's reports.
  
2. All monthly, quarterly, and annual reports, prepared by or on behalf of the Company for the Company's (i) board of

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<sup>1</sup> The Definitions and Instructions located at the end of this Appendix are incorporated by reference into each of the following requests for production.

directors (including without limitation financial packages prepared for meetings of the board of directors), (ii), management team, or (iii) shareholders for the Relevant Time Period

3. All financial reports, opinions and analyses prepared on behalf of the Company by any external accountant, analyst or auditor employed or retained by the Company during the Relevant Time Period.
4. All original and amended income tax returns and related schedules and extensions filed with the State of Georgia, the Internal Revenue Service, or any other taxing authority for Company for the Relevant Time Period.
5. All reports, notices, tax demands, or other documents from the United States or Georgia taxing authorities related to any audit or review of income tax liability of the Company and/or Gaston Glock, Sr. for the Relevant Time Period.
6. Documents reflecting the Company's distribution of dividends, including the recipient and amount of such distributions, for the Relevant Time Period.
7. Documents reflecting the Company's distribution or payment of revenues, salaries, bonuses, profits, management fees or other service fees, or other sums during the Relevant Time Period to (i) Gaston Glock, Sr., (ii) Glock GmbH, (iii) and shareholder or other owner and/or (iv) any other company owned or controlled, directly or indirectly, by Gaston Glock, Sr., including without limitation any other Glock Affiliate.
8. Documents reflecting assets, including real property, in Georgia owned, in whole or in part, by the Company, Gaston Glock, Sr., and/or Glock GmbH.

9. Documents reflecting any loan to, or use of, any asset of the Company by Gaston Glock, Sr. for the Relevant Time Period.
10. Documents reflecting any inter-company loan outstanding during the Relevant Time Period between or among any Glock Affiliates.
11. All contracts between the Company and (i) any of its shareholders and/or (ii) any other Glock Affiliate, including for the purchase or sale of products and goods, leasing, debt facilities, capital infusions, management services, or other financial or operational activities for the Relevant Time Period.
12. Documents reflecting any financial transaction during the Relevant Time Period with any insurance company(ies) owned and/or controlled by any Glock Affiliate, including without limitation, any financial transaction with FAIR.
13. The general ledger for the Company, in electronic form, for each year of the Relevant Time Period.
14. Any financial or fair market valuations, whether internal or external, of the Company's assets or net equity in part or in whole for the Relevant Time Period.
15. Articles of incorporation, bylaws, and any other documents describing the duties and selection of officers and directors of the Company.
16. Each official list of shareholders, officers, trustees and/or directors of the Company and/or any other Glock Affiliate for the Relevant Time Period.

17. Any documents referring to Rochus GbmH, the Glock Privatstiftung, the IGG Privatstiftung, the IGVG Privatstiftung, the Value Privatstiftung, and/or Perfection Limited.
18. Diagrams depicting the corporate structure(s) and/or management hierarchy(ies) of the Company and/or any other Glock Affiliate for the Relevant Time Period.
19. To the extent not called for by a preceding request, documents identifying the extent of Gaston Glock Sr.'s direct or indirect ownership interest in any Glock Affiliate during the Relevant Time Period.
20. To the extent not called for by a preceding request, documents reflecting any financial transactions between Gaston Glock Sr. and/or any Glock Affiliate for the Relevant Time Period.

## DEFINITIONS AND INSTRUCTIONS

Unless the terms of a particular Request specifically indicate otherwise, the following definitions and instructions are applicable to all Requests. The definitions are solely for the purposes of these Requests.

1. As used herein, the words "document," "communication," and "correspondence" are used in their broadest sense under Fed. R. Civ. P. 34.
2. "You," "your," the "Company," or "the Company's" mean the corporate recipient of this Request (as applicable, either Glock, Inc., Consult Invest, Inc., or Glock Professional, Inc.) and its officers, directors, employees, advisors, agents, consultants, independent contractors, and former employees; all direct and indirect subsidiaries, divisions, and joint ventures ; and the officers, directors, employees, advisors, agents, consultants, independent contractors, and former employees of such subsidiaries, divisions, and joint ventures.
3. "Glock Affiliate": Either (i) any of the following legal persons or entities: Glock Privatstiftung, the IGG Privatstiftung, the IGVG Privatstiftung, the Value Privatstiftung, CON Holding GmbH, Glock Horse Performance Center GmbH, Glock Security GmbH, FAIR, Rochus GmbH, Gaston Glock GmbH, , GG Hangar GmbH, Glock GmbH, INC Holding GmbH, Glock Gul- und Forstverwaltung GmbH, Glock Health GmbH, Glock Holding GmbH, Glock Ökoenergie GmbH, Glock Technologie GmbH, Glock Services, Glock, Inc., Consultinvest, Inc., Glock Professional, Inc., Glock America SA, Glock America (Uruguay), Glock (H.K.) Ltd., Glock Ltd., Glock de Venezuela, Glock Middle East, Glock do Brasil SA, Perfection Limited, Reofin International, and/or Unipatent Holding (ii) to the extent not included in the preceding list, any legal person or

entity that controls (directly or indirectly), holds in trust, or owns more than 25% of, any of the Affiliated Entities, or (iii) any legal person or entity that an Affiliated Entity controls (directly or indirectly), holds in trust, or owns in more than 25% part.

4. "Relevant Time Period": January 1, 2008 to present.
5. "Ms. Glock" means Helga Glock, the Applicant in this matter.
6. The terms "relating to," "concerning," and "regarding" (as well as the terms "relate" and "concern") are used interchangeably and include all of the following meanings : comprising, constituting, referring to, discussing, stating, disclosing, reflecting, pertaining to, relevant to, evidencing, embodying, revealing, mentioning, commenting on, memorializing, summarizing, suggesting, and implying.
7. The singular shall be deemed to include the plural ; the plural to include the singular; words in the masculine, feminine, or neuter shall include each of the other genders ; and the words "and" and "or" shall be construed conjunctively or disjunctively , all as necessary to make these document requests inclusive rather than exclusive.
8. For each document the production of which is requested, produce the entire document, along with all attachments, appendices, and exhibits.
9. If any document or thing requested was at one time in existence, but is no longer in existence, please provide the following information for each such document or thing:
  - (a) the type of document or thing;
  - (b) the type of information contained therein;
  - (c) the date upon which it ceased to exist;

(d) the circumstances under which it ceased to exist;  
and

(e) the identity of all persons who have knowledge of  
the contents

thereof.

10. If an objection to a request is based upon a claim of privilege, work product, confidentiality, or any other protection, please provide the following information for each such document:

(a) the date or approximate date of the document;

(b) the type of document (e .g., letter, memorandum, manual, etc .);

(c) a description of the subject matter of the document;

(d) each person who prepared, signed, and/or received the document or any copy thereof;

(e) the present custodian(s) of each document;

(f) a list of attachments or enclosures to the documents;  
and

(g) the nature of the privilege or protection asserted.