

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

GROVE FRESH DISTRIBUTORS, INC.,)	
an Illinois corporation,)	
)	
Plaintiff,)	
)	No. 89 C 1114
vs.)	
)	
FLAVOR FRESH FOODS, INC.,)	Judge Bua
et al.,)	
)	
Defendants.)	

PLAINTIFF'S FIRST REQUEST FOR DOCUMENTS

Plaintiff Grove Fresh Distributors, Inc. ("Grove Fresh") hereby requests that defendant Flavor Fresh foods, Inc. produce for inspection and copying the documents described below.

DEFINITIONS AND EXPLANATIONS

A. The term "orange juice products" means 100% orange juice concentrate, and 100% orange juice from concentrate.

B. The terms "adulteration" or "adulterate," when used in reference to products that are labeled and sold as orange juice products, means the manufacture of such products with ingredients other than those permitted by the standard of identity under the applicable federal laws and regulations. When used in reference to orange juice products that are labeled and sold with the Florida seal of approval, the terms mean the manufacture of such products with ingredients other than those permitted by the laws and regulations of the state of Florida.

C. The time period covered by these requests is January 1, 1983 to the present.

D. "Flavor Fresh" means defendant Flavor Fresh Foods, Inc. (including any predecessor in interest) and all of its officers,

directors, employees, agents, and attorneys. The terms "you" and "your" refer to Flavor Fresh.

E. The term "document" or "documents" includes all writings, drawings, graphs, charts, photographs, recordings, and other data compilations from which information can be obtained or translated, if necessary, by you, through detection devices into reasonably usable form.

F. "Interrogatory" refers to Plaintiff's First Set of Amended Interrogatories to Defendant Flavor Fresh Foods, Inc.

G. In responding to these requests, you are requested to furnish all documents in the possession of your attorneys, agents, investigators, representatives, employees, or anyone acting in cooperation, or in concert, with you or on your behalf, including experts consulted or retained. If any such documents are withheld by you in responding to these requests, you are to state the legal basis you assert for withholding the documents, and identify the factual basis for withholding the documents.

Documents Requested

1. All documents that refer or relate to Flavor Fresh's attempts to be certified by the City of Chicago as a minority contractor.

2. With respect to each person or entity identified in your answer to Interrogatory no. 2, all documents that refer or relate to any agreements between such person or entity and Flavor Fresh.

3. All documents that refer or relate to your adulteration of orange juice products.

4. All documents that refer or relate to the adulteration of orange juice products by any of the persons or entities identified in your answer to Interrogatory no. 2.

5. All documents identified in your answer to Interrogatory no. 7.

6. All documents that refer or relate to the formulas described in your answer to Interrogatory no. 5.

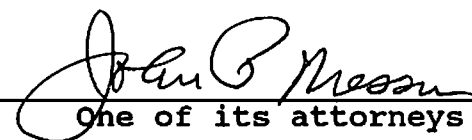
7. All documents that refer or relate to the complaints identified in your answer to Interrogatory no. 8.

8. All documents that refer or relate to the notices of investigation identified in your answer to Interrogatory no. 9.

9. All documents that refer or relate to the contracts identified in your answer to Interrogatory no. 10(d).

10. All documents that refer or relate to any advertisements of orange juice products manufactured or distributed by Flavor Fresh.

GROVE FRESH DISTRIBUTORS, INC.

BY: 
One of its attorneys

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