

ATTACHMENT C

- (1) Western World Commercial Lines Policy No. NPP1123556 issued to Narconon of Georgia, Inc. effective August 19, 2007 to August 19, 2008 (“the Western World Policy”). Said document is in possession of the undersigned counsel for Plaintiff and has also been filed with the Court as an exhibit to the Complaint for Declaratory Judgment. (See Document 1-2);
- (2) All matters on file or to be filed in the Underlying Action, including but not limited to, orders, stipulations, pleadings, motions, memoranda, briefs, discovery requests, discovery responses, and deposition transcripts. Said documents are in the possession of counsel in the underlying state court action. In addition, Counsel for Western World was provided, and has in their possession, a large quantity of documents purported to be those documents referenced hereinabove; however, the completeness of the documents received has yet to be determined.
- (3) All discovery and discovery responses exchanged or to be exchanged between the parties to the Underlying Action. In addition, Counsel for Western World was provided, and has in their possession, a large

quantity of documents purported to be those documents referenced hereinabove; however, the completeness of the documents received has yet to be determined;

- (4) All transcripts of depositions taken or to be taken in the Underlying Action; In addition, Counsel for Western World was provided, and has in their possession, a large quantity of documents purported to be those documents referenced hereinabove; however, the completeness of the documents received has yet to be determined;
- (5) All documents and things exchanged formally or informally between the Parties to the Underlying Action, whether exchanged pursuant to an official discovery request for production of documents or otherwise. In addition, Counsel for Western World was provided, and has in their possession, a large quantity of documents which may include those documents referenced hereinabove; however, the completeness of the documents received has yet to be determined;
- (6) The insurance policy issued to Narconon International by Nonprofits' Insurance Alliance of California, Policy No. 2007-178000-NPO, attached to Document 40-2, filed in this matter. Counsel for Western World is in possession of a copy of the filed document.

Plaintiff reserves the right to supplement this response upon the completion of investigation and discovery. The above referenced documents