

# **EXHIBIT A**

**DRYWALL- DEFENDANTS' DOCUMENT REQUESTS TO PLAINTIFFS WITH PLAINTIFFS' PROPOSED RESPONSE**

Document Request	Text of Request	Direct Purchaser Plaintiffs' Proposal to Defendants <sup>1</sup>
1	All documents identified or relied on in Your responses to Defendants' Joint First Set of Interrogatories to Direct Purchaser Plaintiffs.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
2	Documents sufficient to show the structure and organization of Your business, including the structure and organization of any division, business unit, department or other section of Your business that purchases or sells Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
3	Documents sufficient to identify the name and location, and to describe the responsibilities, duties and reporting obligations, of each of Your divisions, business units, departments, directors, officers, managers, employees, agents, or representatives involved, during the relevant time period, in: (a) buying or selling Gypsum Board Products; (b) negotiating the price of Gypsum Board Products purchased or sold by You; (c) creating or reviewing market forecasts, analyses, studies or projections concerning Gypsum Board Products; (d) creating or reviewing reports of competitive activity concerning	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.

<sup>1</sup> Plaintiffs object to the Requests to the extent that they seek information related to Direct Purchaser Plaintiffs' own sales, prices, or profits, often referred to as "downstream" discovery. Such information is not reasonably calculated to lead to the discovery of admissible evidence; irrelevant to Direct Purchaser Plaintiffs' overcharge claims, class certification, and any permitted defenses; and more burdensome than beneficial within the meaning of Fed. R. Civ. P. 26(b)(2)(C)(iii). *See* Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, General Objection No. 14. Plaintiffs' production is also subject to review for all applicable privileges and protections. The omission of a reference to any privilege or protection shall not be deemed a waiver or agreement to produce documents subject to any applicable privilege or protection, as identified in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents.

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	Gypsum Board Products; (e) providing or obtaining customer service concerning Gypsum Board Products; or (f) maintaining Your inventory of Gypsum Board Products.	
4	Documents sufficient to describe how you create and maintain documents concerning Gypsum Board Products, including all of your policies and systems for document creation, location, retention, disposal and filing.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
5	<p>For the period January 1, 2007 to the present, documents and data reflecting each purchase of a Gypsum Board Product, whether or not from a Defendant, including documents showing the following information for each purchase:</p> <ul style="list-style-type: none"> <li>a. Type of Gypsum Board Product, including all grades, dimensions, and other specifications necessary to identify the Gypsum Board product;</li> <li>b. Seller;</li> <li>c. Dates of purchase, shipment, and receipt;</li> <li>d. Location of purchase, shipment, and receipt;</li> <li>e. Quantity;</li> <li>f. Price per unit;</li> <li>g. Other charges, including freight;</li> <li>h. Any discounts, allowances or rebates received (e.g., volume discounts, commodity discounts, sale discounts);</li> <li>i. Any other terms of sale affecting price;</li> <li>j. Total sales price;</li> <li>k. All other financial terms of the purchase;</li> </ul>	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.

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	<p>l. Any custom or special terms or conditions associated with the transaction;</p> <p>m. Manufacturer, if different than seller;</p> <p>n. Location of manufacturer;</p> <p>o. Whether the purchase was on a spot basis or pursuant to a contract, and if pursuant to a contract, information sufficient to match the purchase to the applicable contract produced pursuant to Request No.6 below;</p> <p>p. All requests for submission of bids, offers, or quotations You made, all bids offers, or quotations, You received, and each acceptance, rejection, evaluation, or modification of any such bids, offers, quotations;</p> <p>q. Whether the purchase was pursuant to a "job quote" and, if so, the terms of the "job quote," the specific job and date range to which the job quote applied, and a copy of the complete bid You submitted for each such job; and</p> <p>r. The end use of the product purchased.</p>	
6	All contracts, purchase orders, or agreements in effect during the relevant time period pursuant to which You purchased Gypsum Board Products, and information sufficient to match each such contract, purchase order, or agreement to the purchases that were made under it identified in the data produced in response to Request No.5.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
8	Documents sufficient to show all rebates, discounts, allowances, incentive payments and other benefits received by You in connection with Your purchases	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents,

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	of Gypsum Board Products.	will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
9	All product catalogs and price lists for Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
10	All documents reflecting the styles, grades, characteristics, types, or forms of Gypsum Board Products purchased by You.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
11	All documents reflecting the prices and volumes of the Gypsum Board Products purchased by You.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
12	All documents reflecting or concerning any negotiations for the purchase of Gypsum Board Products by You.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
13	All documents reflecting or concerning Your reactions or responses to changes in the price of Gypsum Board Products, including any changes in the prices of any Gypsum Board Products or products that contain Gypsum Board Products that you sell or services that you provide that involve Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
14	All documents concerning any market analyses,	Subject to the general and specific objections set forth in Direct

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	studies, reports or surveys concerning Gypsum Board Products or the prices for Gypsum Board Products.	Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
15	All documents concerning Your budgets, forecasts, projections, or strategies with respect to Your purchases of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
16	All documents concerning or discussing the supply, production, availability, or demand for any Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
17	Documents sufficient to show, on a monthly, quarterly, and annual basis, Your inventory levels of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
18	Documents sufficient to show Your policies, practices, or procedures for purchasing, ordering, or inventorying Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
19	All board or management committee meeting minutes, business planning documents, market reports, analyses, presentations, or memoranda created by or for Your senior executives that pertain to the purchase of or demand for Gypsum Board Products or the price of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.

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<b>Document Request</b>	<b>Text of Request</b>	<b>Direct Purchaser Plaintiffs' Proposal to Defendants<sup>1</sup></b>
20	All documents concerning communications between You and any supplier of Gypsum Board Products (including non-Defendant producers, distributors, "buy groups," wholesalers, and brokers) concerning Gypsum Board Products, including invoices, bills, canceled checks, receipts, discounts, or rebates.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
21	All documents concerning any communications between You and any other purchaser of Gypsum Board Products, whether directly or indirectly, through trade associations, or otherwise, concerning Gypsum Board Products or any of the suppliers of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
22	Documents sufficient to show all trade associations to which You belong and all trade association meetings or conferences that You have attended.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
23	All documents concerning the price of any Gypsum Board Product, the service offered by a Defendant concerning any Gypsum Board Product, or the use of the "job quote" practice described in paragraphs 6 and 95 of the Complaint, including all documents concerning communications between You and any purchaser of Gypsum Board Products about prices, services, or "Job quotes" for Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
24	All documents concerning any analysis, study or comparison of Gypsum Board Products or the prices for such products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request

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		for the time period after January 1, 2008.
25	All documents constituting, commenting on, or concerning price increases or price increase announcements applicable to Gypsum Board Products effective January 1, 2012, January 2, 2012, January 1, 2013, or January 2, 2013.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
26	All documents constituting, commenting on, or concerning any actual or proposed price increase or price increase announcement applicable to Gypsum Board Products during the relevant time period.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
27	All documents concerning Defendants' use of "job quotes" as described in paragraphs 6 and 95 of the Complaint, and Your request for and use or non-use of, such job quotes, including documents concerning your compliance with the terms and conditions necessary to qualify for pricing under any "job quote" contract or agreement.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
28	All documents concerning any job quote You sought or received from any Defendant during the relevant time period, including all communications between	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents,



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	You and any Defendant reflecting or concerning any such job quotes.	will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
29	All documents concerning any job quote You sought or received from any non- Defendant supplier of Gypsum Board Products (including producers, distributors, brokers, group purchasing organizations, and other non-Defendant companies) during the relevant time period, including all communications between You and the supplier reflecting or concerning any inquiry about or receipt of such job quotes.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
30	All documents comparing, contrasting, or evaluating the job quotes offered by a Gypsum Board Products supplier to those offered or provided by another Gypsum Board Products supplier.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
31	Documents sufficient to identify the purchases in the documents or data produced in response to Request No.5 that were made pursuant to a job quote; the specific projects for which You requested each job quote and the date range for each such project; the specific projects in which each such purchase was used; and the dates or date ranges the job quote remained applicable for purchases made by You.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
32	Documents sufficient to show all instances when You used Gypsum Board Products purchased pursuant to a job quote for a different project or sale than that listed in or contemplated by the job quote or for a purpose other than that listed in or contemplated by the job quote (e.g., inventory).	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.

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35	All documents concerning Your consideration of any product for use a partial or complete substitute for any Gypsum Board Product.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
36	All documents concerning imported Gypsum Board Products, including the availability of imported Gypsum Board Products to You, Your efforts to obtain or Your actual purchases of imported Gypsum Board Products, the quality of imported Gypsum Board Products, the ability of imported Gypsum Board Products to serve as partial or complete substitutes for Gypsum Board Products manufactured in the United States, or actual or potential competition between domestic- and foreign-made Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
37	All documents that relate or refer to Your selection of suppliers of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
38	All documents that compare or contrast Gypsum Board Products or the services provided by suppliers of Gypsum Board Products, including the similarities, differences, advantages or disadvantages of such products or services.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
40	All contracts, purchase orders, or agreements pursuant to which You resold any Gypsum Board Product purchased from any of the Defendants.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request

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		for the time period after January 1, 2008.
42	All documents concerning Your budgets, forecasts, or strategies with respect to Your sales of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
45	All of Your financial statements for the relevant time period, whether audited or unaudited, including monthly, quarterly, and annual profit and loss statements, balance sheets, cash flow statements, and other financial accounting or operating statements, with the exception of financial statements that do not concern in any way the sale, purchase, production, or use of Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
46	Documents sufficient to show Your costs and the margin or net profit You realized on Gypsum Board Products that You sold between January 1, 2007 and the present, on a monthly, quarterly, and annual basis.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
47	Without limitation as to time, all documents concerning or supporting Your allegation that Defendants entered into an agreement to fix the prices of Gypsum Board Products, to eliminate job quotes, and to restrict the supply of Gypsum Board Products or any other alleged agreement among Defendants concerning Gypsum Board Products.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
48	All documents reflecting or concerning any meetings or other communications concerning Gypsum Board Products between or among representatives of two or more companies that sell	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request

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	Gypsum Board Products in the United States.	for the time period after January 1, 2008.
49	Without limitation as to time, all documents concerning Your allegations regarding the demand for Gypsum Board Products and Your allegations regarding market demand, including but not limited to the allegations in paragraph 88 of the Complaint that "Defendants anticipated flat demand" and that the alleged increase in Gypsum Board Products prices "was not in response to-or in expectation of-an increase in demand for gypsum board" and in paragraph 90 of the Complaint that Defendants "[f]aced ... an anticipated weak market with no immediate prospect of rebound."	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
50	Without limitation as to time, all documents concerning Defendants' input costs and Your allegations regarding input costs, including but not limited to the allegations in paragraph 91 of the Complaint that "[t]he costs of the major inputs into gypsum board were stable or even falling during the 2011-2012 time period" and that the alleged 2012 price increase was "not reflective of increased costs of producing and selling gypsum board."	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
54	All documents reflecting or discussing conditions in the market for Gypsum Board Products, including (i) documents concerning the effects of consolidation, acquisitions, divestitures, closures, or bankruptcies in the Gypsum Board Products industry, (ii) the supply, production, price, or availability of or demand for Gypsum Board Products, (iii) competition in the Gypsum Board Products industry,	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.

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	or (iv) how macroeconomic forces or market conditions in the construction industry affected the Gypsum Board Products industry.	
57	All documents constituting or concerning any settlement, agreement, contract, or understanding of any kind reached by You with any other Person (whether a party to the litigation or not) regarding the Litigation.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
58	All documents concerning Your decision to file the Complaint or join this litigation as a named Plaintiff, including board or management committee minutes, presentations, or memoranda.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
59	All communications between any named Plaintiff and any other putative class member concerning this Litigation or any allegations made in the Complaint.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
61	All documents quoted or referenced in the Complaint.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
62	Without limitation as to time, all documents that You intend to use to support Your claims at trial in this action.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
63	All documents produced to You by any third party in connection with this action.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to

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		Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.
64	All documents produced to You by any Defendant who settles claims against it in this litigation.	Subject to the general and specific objections set forth in Direct Purchaser Plaintiffs' Consolidated Responses and Objections to Defendants' Joint First Request for Production of Documents, will produce non-privileged documents responsive to this request for the time period after January 1, 2008.