

IN THE CIRCUIT COURT OF THE
15TH JUDICIAL CIRCUIT, IN AND
FOR PALM BEACH COUNTY, FLORIDA

CASE NO.: 50-2019-CA-013860-XXXX-MB

GABE HOFFMAN,

Plaintiff,

v.

THOMAS SCHOENBERGER,

Defendant.

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION TO DEFENDANT

Plaintiff, GABE HOFFMAN, pursuant to Fla. R. Civ. P. 1.350, hereby requests that Defendant, THOMAS SCHOENBERGER (the "Defendant"), produce the below described documents for inspection and copying, and to serve a written response hereto within thirty days.

REQUESTS

Said documents and/or materials to be produced are for the period subsequent to May 13, 2019 (the date of the death of Isaac Kappy):

1. All documents identifying, reflecting or referring to internet or social media communication accounts used or accessed (directly or indirectly), by Defendant, including suspended and/or inactive accounts and accounts created by any third party. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

2. All documents, identifying, reflecting or referring to Isaac Kappy, including, but not limited to any video, textual or written messages or images posted by Defendant on the internet or social media. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

3. All documents, identifying, reflecting or referring to Gabe Hoffman, including, but not limited to any video, textual or written messages or images posted by Defendant on the internet

or social media. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

4. All documents, identifying, reflecting or referring to Gabe Hoffman or Isaac Kappy, including, but not limited to any video, textual or written messages or images posted by the following third parties on the internet or social media. A list of these individuals is attached as Exhibit A. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

5. All documents identifying, reflecting or referring to email accounts or addresses used, or accessed (directly or indirectly), by Defendant, including suspended accounts and accounts created by any third party. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

6. All documents identifying, reflecting or referring to phone numbers, cell phone numbers (with text messages) used (directly or indirectly), or accessed, by Defendant, including suspended accounts and accounts created by any third party. Such accounts include, but are not limited to, Twitter, Instagram, YouTube, Parler, Gab, Discord, Streamable, Bitchute, Vimeo, DLive and Facebook.

DATED this 7th day of August, 2020.

KELLEY KRONENBERG, PA
Counsel for Plaintiff
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By: /s/ Dennis S. Klein
DENNIS S. KLEIN
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 7th day of August, 2020, this document was filed using the Florida Courts E-Filing Portal. This document is being served on all counsel and pro se parties of record by the Florida Courts E-Filing Portal, pursuant to and in compliance with Fla. R. Jud. Admin. 2.516. The mailing and electronic addresses are: Thomas Schoenberger, (*pro se Defendant*) at tstger13@gmail.com, 1726 Willowbrook Drive, Provo, UT 84604.

By: /s/ Dennis S. Klein
Dennis S. Klein