#### **EXHIBIT E**

### IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF COLUMBIA

IN RE:	) .	Chapter 11
GREATER SOUTHEAST COMMUNITY HOSPITAL CORP., I, et al.,	)	Jointly Administered Case No. 02-2250
Debtors,	)	Honorable S. Martin Teel, Jr.

# CREDITOR'S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS DIRECTED TO DCHC LIQUIDATING TRUST

Pursuant to Fed. R. Civ. P. 34, as incorporated by Fed. R. Bankr. P. 7034, Creditor, Contech-MSI Co. ("Contech"), by its undersigned attorneys, hereby requests that DCHC Liquidating Trust (the "Trust") produce the following documents described in this request for inspection and copying at the offices of Metge, Spitzer & Kreid, 30 West Monroe Street, Suite 630, Chicago, Illinois 60603, and produce written responses to these requests fourteen days prior to the hearing scheduled on the matter of Trust's Objection to Contech-MSI Co.'s Secured Claim.

1. Produce all documents which refer or relate to your Objection to Contech-MSI Co.'s Secured Claim, whether supportive or prejudicial to any position taken, contention made, or fact stated in your Objection, including, but not limited to, all original source documents, copies of both sets of checks or other payouts to Contech, and all original source documents which establish the validity of entries in the spreadsheets attached to the Carolyn Jackson Declaration attached to the Objection.

- 2. If you keep one or more files specifically relating to Michael Reese Medical Corporation's relationship (or the relationship of any of its affiliates) with Contech, produce such file(s).
- 3. Produce all documents referring or relating to agreements between Michael Reese and Contech at any time and of any nature.
- 4. Produce all documents referring or relating to Contech's shipment of goods or furnishing of services to Michael Reese at any time.
- 5. Produce all documents referring or relating to the receipt by or on behalf of Michael Reese of goods shipped or services rendered by Contech at any time.
- 6. Produce all documents constituting, referring to, relating to, or accompanying any payments by or on behalf of Michael Reese or for the benefit of Contech.
- 7. If not already provided in response to a prior request, produce all documents constituting, evidencing, or relating to any communication between Michael Reese and Contech at any time.
- 8. Produce all summaries, analyses, calculations, and other documents used in or prepared for the Objection asserted by Michael Reese against Contech in this proceeding.
- 9. Produce all documents reviewed, relied on, or produced by Carolyn Jackson, whom Michael Reese relies on or intends to call during hearing on this matter.
  - 10. Produce a current curricula vitae for Carolyn Jackson.
- 11. If not already provided in response to a prior request, produce all documents relied upon, referenced, or reviewed in preparation of each allegation, denial, and defense in the Trust's Objection to Contech's Secured Claim.

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12. Produce all iterations of the Carolyn Jackson Declaration and spreadsheets attached to the Jackson Declaration, and all documents reviewed or relied upon by Carolyn Jackson to prepare the Declaration and spreadsheets appended thereto.

CONTECH-MSI CO.

Bv

One of its attorneys

Christopher A. Kreid Metge, Spitzer & Kreid 30 West Monroe Street, Suite 630 Chicago, Illinois 60603 (312) 580-1710

#### CERTIFICATE OF SERVICE

I, Christopher A. Kreid, an attorney, certify I served a copy of the foregoing document on each of the persons named below, at their respective addresses shown below, by placing the same in a properly addressed envelope, with postage prepaid, and depositing the same in the U. S. Mail at 30 West Monroe Street, Chicago, Illinois, before 5:00 p.m. this 17<sup>th</sup> day of December, 2008.

Christopher A. Kreid

Jeffrey E. Schmitt White & Case LLP 701 Thirteenth Street, N.W. Washington, DC 20005 Dennis Early, Esq.
Office of the U. S. Trustee
115 South Union Street
Alexandria, VA 22314

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