

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF INDIANA
NEW ALBANY DIVISION

IN RE: §
§
EASTERN LIVESTOCK CO., LLC, § CASE NO. 10-93904-BHL-11
§
Debtor. § CHAPTER 11
§

CACTUS GROWERS, INC., §
§
Plaintiff, §
§
V. § Adversary Proceeding No. 11-59087
§
ROBERT NICHOLS, JANE NICHOLS, §
and NICHOLS LIVESTOCK, §
§
Defendants. §

FRIONA INDUSTRIES, LP, et al. §
§
Plaintiff, §
§
v. §
§ Adversary Proceeding No. 11-59093
EASTERN LIVESTOCK CO., LLC, §
et al. §
§
Defendants. §
§
§

NOTICE OF PRE-PROTOCOL DISCOVERY REQUESTS

TO: ALL COUNSEL OF RECORD

Please take notice that the following discovery requests have been previously served by counsel for Cactus Growers, Inc.:

	DATE	DOCUMENT	RECIPIENT
1	08/01/11	Requests for Production	Robert Nichols, Jane Nichols and Nichols Livestock
2	08/01/11	First Set of Interrogatories	Robert Nichols, Jane Nichols and Nichols Livestock
3	08/26/11	Notice of Oral and Videotaped Deposition	Robert Nichols
4	08/26/11	Notice of Oral and Videotaped Deposition	Jane Nichols
5	09/15/11	Notice of Oral and Videotaped Deposition	Jack S. Dawson

DATED this 29th day of November, 2011.

Respectfully submitted,

John H. Lovell
TX SBN: 12609300
LOVELL, LOVELL, NEWSOM & ISERN, LLP
112 W. 8th Avenue, Suite 1000
Amarillo, Texas 79101-2314
Phone: (806) 373-1515
Fax: (806) 379-7176
E-mail: john@lovell-law.net

and

Mark A. Robinson
VALENTI HANLEY & ROBINSON, PLLC
One Riverfront Plaza, Suite 1950
401 West Main Street
Louisville, KY 40202
Phone: (502) 568-2100
Fax: (502) 568 2101
E-mail: mrobinson@vhrlaw.com

ATTORNEYS FOR PLAINTIFF CACTUS GROWERS, INC.

/s/ John Lovell
John H. Lovell

CERTIFICATE OF SERVICE

I hereby certify that on November 29, 2011, I caused a true and correct copy of the foregoing document to be electronically submitted with the clerk of court for the U.S. District Court - Bankruptcy Court, Southern District of Indiana, using the electronic case filing system of the court and electronically mailed to the parties registered or otherwise entitled to receive electronic notices in this case pursuant to the Electronic Filing Procedures in this District.

/s/ John Lovell

John H. Lovell