

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF DELAWARE**

**IN RE:**

**RC SOONER HOLDINGS, LLC, *et al.*,**

**Debtors.**

**(Chapter 11)  
Case No. 10-10528 (BLS)  
(Jointly Administered)**

**SUPPLEMENTAL RESPONSE TO DEBTORS' REQUESTS FOR PRODUCTION OF  
DOCUMENTS**

The RemyCo Entities,<sup>1</sup> by and through their undersigned counsel, submit this Supplemental Response Debtors' Requests For Production of Documents Pursuant to Bankruptcy Rule 2004 and state as follows:

**GENERAL OBJECTIONS**

- A. With respect to all twenty-eight (28) document requests the RemyCo Entities object to Debtors' requests for production of documents to the extent that they seek information which is subject to the Attorney-Client Privilege, or the Work Product Privilege, or otherwise seeks information beyond the scope of discovery permitted by Rule 2004.
- B. With respect to all twenty-eight (28) document requests the RemyCo Entities object to production of the documents sought by these requests, as any documents which would or could be responsive to these request (1) are already in the possession of Debtors and/or its counsel, and (2) would be overly burdensome to produce.

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<sup>1</sup> The RemyCo Entities which are the subject of the Debtors' 2004 Motion are RemyCo., Inc., The Remy Companies, Inc., Home Realty Ventures, Inc., Bradford Creek Properties, LLC, Landrum Design and Development Co., Inc., Diamond Pointe, LLC, Bluechip Holdings, LLC, Tim L. Remy, Tim J. Remy, Sherry E. Remy, L. Leon Remy, Robin E. Remy, Sherry E. Remy Revocable Trust DTD July 14, 1997, L. Leon Remy Revocable Trust DTD July 14, 1997, and Mona Remy Burke. The RemyCo Entities are located in the State of Oklahoma. Other than the filing of this bankruptcy case, the RemyCo Entities have no connection to the State of Delaware.

C. With respect to all twenty-eight (28) document requests the RemyCo Entities also object to the extent they seek privileged documents or seek documents containing “confidential” business information related to RemyCo Entities’ or their Clients’ businesses, operations, finances, proprietary information and trade secrets other than that of the Debtors.

D. Subject to, and without waiving its General Objections, the RemyCo Entities respond to the 28 requests as follows:

**RESPONSE TO REQUEST NO. 1:** Subject to, and without waiving its General Objections, the RemyCo Entities state that except as may be noted in Requests No. 2 through 28, there are no documents in its possession that are responsive to Debtors’ Request No. 1 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 2:** Subject to, and without waiving its General Objections, the RemyCo Entities state that (1) Request No. 2 goes beyond the scope authorized by Bankruptcy Rule 2004 as it seeks documents that do not relate to Debtors, or are directly related to the Debtors’ preparation of their schedules and statements, (2) Request No. 2 seeks individual personal records from any financial institution whether or not such institution has any relationship with or business connection to Debtors and, therefore, is over broad. To the extent the request relates to the records of financial institutions including Bank of the West that are directly related to the Debtors’ preparation of their schedules and statements, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors’ Request No. 2 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 3:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 3 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 4:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 4.

**RESPONSE TO REQUEST NO. 5:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 5 that the RemyCo Entities believe are unrelated to the Adversary, in addition, the establishment of a BAR DATE for filing Proof of Claims will provide Debtors with an accurate and more viable source of information regarding claims against their estate.

**RESPONSE TO REQUEST NO. 6:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 6 that the RemyCo Entities believe are unrelated to the Adversary. Without waiving any objection and by way of further response only, the RemyCo Entities state that with respect to the Apartment LLC's there were no loans or mortgages between the Apartment LLCs as lender or mortgagor and the RemyCo Entities.

**RESPONSE TO REQUEST NO. 7:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 7 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 8:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 8 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 9:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 9 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 10:** Except as noted below in this Response to Request No. 10 and subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 10 that do not involve matters related to the Adversary. Without waiving any objection and by way of further response only, the RemyCo Entities state that with respect to the Apartment LLC's there were numerous eviction proceedings undertaken on its behalf in the year preceding the Petition Date. Due to the volume of documents, any such documents will be made available to the Debtors at the law offices of Sneed Lang Herrold P.C. in Tula, OK for inspection and copying.

**RESPONSE TO REQUEST NO. 11:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 11.

**RESPONSE TO REQUEST NO. 12:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 12.

**RESPONSE TO REQUEST NO. 13:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No.13.

**RESPONSE TO REQUEST NO. 14:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 14.

**RESPONSE TO REQUEST NO. 15:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 15. Without waiving any objection and by way of further response only, the RemyCo Entities state that with respect to the Apartment LLC's property there were no claims made against insurance policies for any losses within one year preceding the Petition Date.

**RESPONSE TO REQUEST NO. 16:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 16.

**RESPONSE TO REQUEST NO. 17:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 17.

**RESPONSE TO REQUEST NO. 18:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 18 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 19:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 19. Without waiving any objection and by way of further response only, the RemyCo Entities state that with respect to the Apartment LLCs there have been no address changes in the three (3) years preceding the Petition Date.

**RESPONSE TO REQUEST NO. 20:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 20.

**RESPONSE TO REQUEST NO. 21:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 21.

**RESPONSE TO REQUEST NO. 22:** Subject to, and without waiving its General Objections, the RemyCo Entities state that the bookkeeper(s) who kept the books and records of the Apartment LLCs within two (2) year(s) preceding the Petition Date is:

Robin Remy - See Exhibit A Attached

**RESPONSE TO REQUEST NO. 23:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no individuals or firms who audited the books and records of the Apartment LLCs in the two (2) years preceding the Petition Date and the individual that prepared financial statement(s) of the Apartment LLCs in the two (2) years preceding the Petition Date is:

Robin Remy - See Exhibit A Attached

**RESPONSE TO REQUEST NO. 24:** Subject to, and without waiving its General Objections, the RemyCo Entities state that to the extent of its understanding of the phrase "inventories" there are no documents in its possession that are responsive to Debtors' Request No. 24.

**RESPONSE TO REQUEST NO. 25:** Subject to, and without waiving its General Objections, the RemyCo Entities state that no Member of the Apartment LLCs withdrew from the LLC within the year preceding the Petition Date.

**RESPONSE TO REQUEST NO. 26:** Subject to, and without waiving its General Objections, the RemyCo Entities state that the name and Federal Taxpayer Identification Number of the Parent of the Apartment LLCs are:

Home Realty Ventures, Inc. - 73-1258731

Bradford Creek Properties, LLC - 20-2405477

Landrun Design and Development Co., Inc. - 20-3582845

Diamond Pointe, LLC- 73-1574049

Bluechip Holdings, LP - 73-1615145

**RESPONSE TO REQUEST NO. 27:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 27 that the RemyCo Entities believe are unrelated to the Adversary.

**RESPONSE TO REQUEST NO. 28:** Subject to, and without waiving its General Objections, the RemyCo Entities state that there are no documents in its possession that are responsive to Debtors' Request No. 28 that the RemyCo Entities believe are unrelated to the Adversary.

**WHEREFORE,** for the reasons set forth herein, The RemyCo Entities respectfully requests that the Court quash the Motion and the document requests therein as they relate to The RemyCo Entities, as well as grant it any other and further relief that is just and equitable.

April 8, 2010

Respectfully Submitted

/s/ Noel C. Burnham

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