

PAUL MASTRONARDI,

Plaintiff,

vs.

LUIS CHIBANTE, et al.,

Defendants.

I. JEAN HECKSTROTH
CLERK OF COURTS

Case No. 2017 CV 0144

Judge Pepple

**SUPPLEMENTAL SUBMISSION OF PAUL MASTRONARDI
IN SUPPORT OF CLAIM NUMBER 46**

Pursuant to the Court's order of September 19, 2018, Paul Mastronardi hereby submits (a) all records of Golden Fresh Farms Holdings, Inc. in his possession, under his control, or that he has access to; and (b) all records of Golden Fresh Farms Enterprises, L.P. in his possession, under his control, or that he has access to.

Responsive materials are being provided to the Court on a flash drive. The following points are noted:

1. The responsive materials were recovered from, among other sources, Paul Mastronardi's computer. The production is over-inclusive, in part because of the multiple uses of an assigned Golden Fresh email, and the production includes materials that are not necessarily records of either of the Golden Fresh Entities but do relate to them or in the investors in some fashion. But out of an abundance of caution, the materials are included.

2. Documents produced by Luis Chibante to Paul Mastronardi in the above-referenced case are included as part of this production out of an abundance of caution.

3. Documents produced by Paul Mastronardi to Luis Chibante in the above-referenced case are included as part of the production out of an abundance of caution. Some of

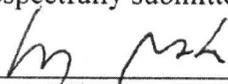
the documents produced include materials that had been produced in the case of Luis Chibante, et al. v. Paul Mastronardi, Franklin County Common Pleas Court Case No. 17 CV 008102. Not all records belonging to Altluna, LLC are included as those are not viewed as records of the Golden Fresh entities. The inclusion of these materials does not constitute a concession that the materials relate to the Golden Fresh entities. However, they are being included in an abundance of caution without waiver or prejudice to Mr. Mastronardi's position.

4. Mr. Mastronardi notes that records of the companies should also be available from (or were available from) (a) at the Wapakoneta facility; (b) on the server(s) utilized by the companies; (c) in the possession of Luis Chibante or his staff and companies; and (d) legal counsel purportedly retained for the Companies by Mr. Chibante, specifically the law firm of Keating Muething & Klekamp PLL.

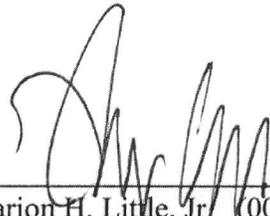
5. The production does not include communications with or documents provided by the Receiver. The Receiver has advised that his correspondence with lawyers, litigants, claimants, or any anyone else of record pertaining to the receivership and the associated litigation are not records of the Golden Fresh Farms entities.

6. The production does not include a memorandum regarding a herbicide claim that the Receiver has designated as confidential and privileged.

Respectfully submitted,



Kraig E. Noble (0010383)
Noble, Montague & Moul, LLC
146 E. Spring Street
St. Marys, Ohio 45885
(P) 419-394-7441
(F) 419-394-7694
knoble@nmmlawyers.com



Marion H. Little, Jr. (0042679)

Matthew S. Zeiger (0075117)

ZEIGER, TIGGES & LITTLE LLP

3500 Huntington Center

41 South High Street

Columbus, Ohio 43215

(614) 365-9900

(614) 365-7900

little@litohio.com

zeigerm@litohio.com

Attorneys for Plaintiff, Paul Mastronardi

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CLERK OF COURTS

P. O. Box 409
AUGLAIZE COUNTY
WARREN, OHIO 45895-0098

Flesh Drive in Support of
Claim Number 46

17CV 0194

Per Judge this is exhibit 1001

RETURN RECEIPT REQUESTED
SHOWING ADDRESS WHERE DELIVERED