

PLAINTIFF CHURCH TOWERS URBAN RENEWAL CORPORATION'S

INITIAL DISCLOSURES

Plaintiff, Church Towers Urban Renewal Corporation ("Church Towers") makes its required initial disclosures under FED. R. Civ. P. 26(a)(1) as follows:

I. Persons having Discoverable Information:

Plaintiff believes that the following persons are likely to have discoverable information that it may use to support its claims, unless solely for impeachment:

- A. Kevin Horton, c/o Mark Kaiser, Esq., PO Box 632, Painesville, Ohio 44077;
- B. Norman Lynn, c/o Fred Harecke, Esq., 29 South LaSalle Street, Suite 945, Chicago, Illinois 60603-1526;
- C. Representatives of Kukui Gardens Corporation, c/o Charles W. Gall, 999 Bishop Street, Suite 2600, Honolulu, Hawaii 96813;
- D. Representatives of HUD, 451 7th Street SW, Washington, DC 20410;
- E. Representatives of Travelers Casualty and Surety Company, c/o Cory S. Park, Esq., American Savings Bank Tower, 1001 Bishop St., Suite 1300, Honolulu, HI 96813;
- F. Shirley L. Keys, Certified Shorthand Reporter #383 who took the deposition of Kevin Horton on September 22, 2009;
- G. Roger Levy, YAN Management Corp., P.O. Box M82, Hoboken, New Jersey 07030;

- H. John J. Laftis, Loan Representative, Federal National Mortgage Association, 510 Center Plaza, Philadelphia, PA 19103;
- I. Representatives of Total Property Concepts, Inc., 10 Church Towers, Hoboken, New Jersey 07030;
- J. Deborah A. Forte, 10 Church Towers, Hoboken, New Jersey 07030;
- K. Representatives of Church Towers Urban Renewal Corp., 10 Church Towers, Hoboken, New Jersey 07030;
- L. Representatives of the Federal Housing Administration, U.S. Department of Housing and Urban Development 451 7th Street S.W., Washington, DC 20410;
- M. Representatives of all of the named Defendants at the addresses set forth in the Complaint.

II. Description of Documents:

A description of documents, or categories of documents, which are in the possession of Plaintiff or its counsel and that it may use to support its claims or defenses, unless solely for impeachment, is as follows:

- A. All documents which appear in the public records relating to title to the Church Towers property in Hoboken and all liens, mortgages, assignments, regulatory agreements, etc.
- B. All correspondence between Church Towers, Total Property Concepts and any of the Defendants, as well as HUD relating to the mortgage and

regulatory agreement as well as payments on the principal, interest and escrows pursuant to the mortgage and regulatory agreement.

C. All documents in the possession of the Defendants relating to correspondence, agreements, accounting records, deposit records, loans, the servicing of loans, the repayment of loans by Plaintiff or any of the Defendants which in any way relates to the Church Towers mortgage.

D. Additional documents will be determined through the course of pre-trial discovery. Plaintiff shall timely supply documents and shall timely amend its disclosures regarding this matter.

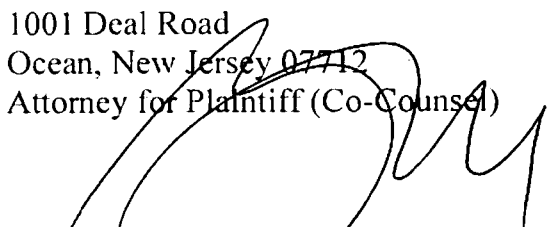
III. Computation of Damages:

Plaintiffs' exact computation of damages requires awaiting accountings by all those in possession of the "escrow funds" from the time of the making of the mortgage to the time of its payoff. Upon information and belief, however, Plaintiff believes that the sum due to it exceeds \$1,000,000.00.

IV. Insurance Information:

Plaintiff is unaware of any Defendant carrying an insurance policy that may be liable to satisfy part or all of a judgment which may be entered against one or more of the Defendants in this action.

FOX & MELOFCHIK, L.L.C.
1001 Deal Road
Ocean, New Jersey 07712
Attorney for Plaintiff (Co-Counsel)



By: GARY E. FOX

BENNET D. ZUROFSKY, ESQ.
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Attorney for Plaintiff (Co-Counsel)



By: BENNET D. ZUROFSKY

(Bennet)