

UNITED STATES DISTRICT COURT

EASTERN

DISTRICT OF

WISCONSIN

TISSUE TECHNOLOGY, LLC, PARTNERS CONCEPTS DEVELOPMENT, INC.,
 OCONTO FALLS TISSUE, INC., and TISSUE PRODUCTS TECHNOLOGY
 CORP.,

EXHIBIT AND WITNESS LIST

V.

Case Number: 14CV1203

TAK INVESTMENTS, LLC and SHARAD TAK

PRESIDING JUDGE The Honorable William C. Griesbach					PLAINTIFF'S ATTORNEY Michael J. Ganzer	DEFENDANT'S ATTORNEY Jonathan T. Smies
TRIAL DATE(S) 09/18, 19 & 20, 2017					COURT REPORTER	COURTROOM DEPUTY
PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
1					ST Paper Tissue Project dated 12/27/05	
2					Memorandum of Understanding dated 05/05/06	
3					Letter to Ronald Van Den Heuvel dated 05/05/06 regarding the Joint Business Development Agreement	
4					Letter from ST Paper, LLC to Goldman Sachs dated 03/28/07	
5					Memorandum to Sharad Tak dated 03/29/07 regarding financing	
6					Memorandum to Sharad Tak from Ronald Van Den Heuvel dated 04/09/07 regarding closing financing	
7					Second Amended and Restated Asset Purchase Agreement	
8					Final Closing Statement dated 04/16/07	
9					Title Company Transaction Statement	
10					UCC Financing Statement Amendments	
11					Final Business Terms Agreement dated 4/16/07	
12					Assignment of Promissory Note dated 04/17/07; Amended and Restated Assignment of Promissory Note dated 03/05/08; Re-Assignment of Promissory Note dated 08/14/14	
13					Consent to Pledge of Promissory Note dated 07/12/07 with attached Promissory Note dated 04/16/07	
14					Associated Banc-Corp Request for Charge Off Authorization dated 06/30/08 (4 total) with Collateral Pledge and Assignment of Note and 04/16/07 Promissory Note and Collateral Receipt attached	
15					Baylake Bank Assignment of Note dated 03/12/08 with Notice of Assignment, Assignment Acknowledgement, Promissory Note attached	
16					WI Dept. of Financial Institutions UCC Filing Search, Duplicate Lien Release Request, Annual Report, Filing Confirmation & UCC Financing Statement Amendment of Partners Concepts Development, Inc.	
17					Baylake Bank Assignment of Note dated 12/28/09 with 03/05/08 Promissory Note attached	
18					Letter from Ron Van Den Heuvel to Sharad Tak dated 09/17/09 regarding payments due under the Investment Notes.	
19					Letter from Ron Van Den Heuvel to Sharad Tak dated 04/20/10 cancelling the Investments Notes.	
20					Certified letter to Sharad Tak, with attached Exhibits A-D, from Ronald Van Den Heuvel dated 08/15/14 giving notice of the cancellation of Investments Notes	
21					Certified letter to Ron Van Den Heuvel from Sharad Tak dated 09/04/14 acknowledging receipt of the 08/15/14 promissory note cancellation notice and stating it has no obligation to same	
22					Email from Sharad Tak to Ron Van Den Heuvel dated 01/26/09	

* Include a notation as to the location of any exhibit not held with the case file or not available because of size.

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PLF. NO.	DEF. NO.	DATE OFFERED	MARKED	ADMITTED	DESCRIPTION OF EXHIBITS* AND WITNESSES	
23					Email from Sharad Tak to Rob Cera with copy to Ron Van Den Heuvel dated 02/26/09 regarding meeting and attaching payment schedule	
24					Email from Sharad Tak to Ron Van Den Heuvel dated 03/19/09 regarding contract issues	
25					Email from Sharad Tak to Scott King, copy to Sahil Tak and Ron Van Den Heuvel dated 04/17/09	
26					Email from Ron Van Den Heuvel to Sharad Tak dated 05/18/09 regarding open issues	
27					Email from Sharad Tak to John W. Johnson of Bay Bank, copy to Ron Van Den Heuvel, dated 08/27/09 regarding wire transfer	
28					Email from Sharad Tak to Ron Van Den Heuvel dated 09/30/09 regarding wire status	
29					Email from Ron Van Den Heuvel to Paul Griepentrog dated 07/16/10 forwarding email from Sharad Tak of 07/14/10	
30					Email from Sharad Tak to Ron Van Den Heuvel, copy to Ann Murphy and Pat Murphy, dated 08/25/09 regarding TTL Agreement	
31					Demand letter (undated) to Sharad Tak from Ronald Van Den Heuvel regarding payment of the four promissory notes and attached sheet of Seller Notes	
32					Letter to Ronald Van Den Heuvel from Sharad Tak dated 05/08/15 in response to Van Den Heuvel demand letter	
33					Letter of Direction to Michael Daniels at Nicolet National Bank from Sharad Tak (undated)	
34					Affidavit of Sharad Tak from Brown County Case No. 10CV2714 dated 09/09/11	
35					Johnson Bank Premier Business Money Market Checking account statements dated 04/30/07, 09/30/08 and 09/05/08 for Partners Concepts Development, Inc.	
36					Promissory Note dated 12/21/06 between Tak Investments LLC and Partners Concepts Development	
37					Declaration of Sharad Tak from US District Court Case No. 14C1203 dated 08/01/16	
38					Declaration of Sharad Tak in Support of Tak Investments, LLC's Motion for Summary Judgment dated 07/14/17	
39					Amended promissory Note Term Loan dated 04/16/07 between Tak Investments LLC and Partners Concepts Development, Inc.	
40					Second Amendment to Promissory Note Term Loan dated 12/21/06 as Amended 04/16/07	
41					Amended and Restated Sales and Marketing Agreement dated 09/20/06 with attached Exhibits	
42					Assignment of Sales and Marketing Agreement dated 04/25/07 between Tissue Technology LLC and Nicolet National Bank	
43					Commission Agreement dated 07/01/08 between Tissue Technology LLC and ST Paper, Supplemental Commission Waiver Agreement, Demand for Payment of Commissions and Acknowledgement of Notice	
44					ST Paper LLC Purchases OFTI Stock; PCDI Seller Note; Assumed Debt 02/19/07; Oconto Falls Tissue Inc. Receivables & Inventory; PCDI Note Payout; Payments Remaining chart; & various interest charts	

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