



**KOHLMEYER | HAGEN**  
LAW OFFICE CHTD.

T 507.625.5000  
F 507.625.5004

August 16, 2022

**Via EFS**

Ms. Tami L. Peterson  
525 South Front Street  
Mankato, MN 56001

**RE: In re the Marriage of Brent Donner and Denise Donner**  
**Court File No.: 08-FA-22-291**

Dear Ms. Peterson,

We are in receipt of your client's Responses to Discovery served upon us on June 15, 2022, and note the following deficiencies:

**Interrogatory 8:** Your client did not indicate what, if any, payments are automatically taken out of the accounts listed. Please provide a response to item d.

**Interrogatory 16:** Your client indicated that she was not finished with her budget yet. Please provide an itemized breakdown of your client's monthly expenses and address the other items in Interrogatory 16 if applicable.

**Request for Production 2:** Your client did not provide pay stubs for income between January 1, 2022, and March 14, 2022. Please provide those statements or if no paychecks were received, a reason why paycheck were not received during that time.

**Request for Production 7:** Your client provided statements through January 18, 2022 for American Express credit card ending in xx1005. Please provide statements from January 19, 2022, to present. Regarding the Scheels Visa x3029, we received the most recent statement then year-end statements. Please provide monthly statements for the past 36 months.

**Request for Production 14:** Your client alluded to a document signed by the parties regarding the KBB estimates for vehicles but did not provide this signed document or KBB estimates. Please provide any documents related to how you determined the value of motor vehicles referenced in the Interrogatories.

In addition to the deficiencies noted above, please have your client supplement the following requests to include statements through today's date:

**Request for Production 4:**

Monthly banking statements for the past 36 months for any joint or individual accounts, including but not limited to, checking, savings, credit union, and money market, used by you, or in which you have or have had an interest. Please also provide copies of all check stubs and deposit slips from the past 36 months.

**Request for Production 5:**

Statements as issued (monthly or quarterly or annually) for any and all retirement, pension and/or profit-sharing plans for the past 36 months.

**Request for Production 6:**

Monthly statements for the past 36 months for any investment accounts in your name or for which you have the power to buy or sell, including but not limited to stocks, mutual funds, bonds, treasury bills, and investments of every kind.

**Request for Production 7:**

Monthly statements for the past 36 months of any and all credit cards in your name or used by you.

**Request for Production 8:**

Any and all documents, including monthly statements, for the past 36 months evidencing your outstanding liabilities, specifically including promissory notes, invoices, bills, account statements, refinancing documents, and other documents evidencing current indebtedness.

**Request for Production 18:**

All documents, records, notes, and files supporting your average monthly living expenses.

**Request for Production 20:**

Copies of all expert reports and any documents, records, notes and files that served as a basis for the expert's opinion that are related to this case.

Sincerely,

*/s/ Jason C. Kohlmeyer*

Jason C. Kohlmeyer  
Attorney  
jkohlmeyer@khmnlaw.com