



November 1, 2023

**Via Email Only**

Kimberly T. Walker ([ktwalker@kwalkerlawoffice.com](mailto:ktwalker@kwalkerlawoffice.com))  
4500 Park Glen Rd, Suite 220  
St. Louis Park, MN 55416

**RE: In Re the Marriage of Ryan D. Guritz and Bianca Guritz  
Case File No.: 81-FA-23-117**

Dear Ms. Walker,

I have reviewed the supplemental documents provided on 09/25/23 and noted the following deficiencies, listed below. To have sufficient time to review this information and request supplemental information before the motion hearing scheduled for November 17, 2023, the missing information **must be provided by 3:00 PM on Monday, November 06, 2023.**

**Petitioner's Request for Production of Documents (served 5/19/2023)**

- 1. Number 1: Employment.** Please provide a listing of Ms. Gurtiz's employment for the past five years inclusive of self-employment. Please include the name and address of the employer, position held, hours worked per week, the hourly wage, and reasons for leaving that employment. Please provide the address of the employer, title of position(s) held, hours worked per week, hourly wage, and reasons for leaving employment, if applicable. The same information must be provided for your client's business, "Pampered Farmhouse, LLC".
- 2. Number 2: Tax Returns.** Please provide copies of Ms. Guritz's State and Federal Tax Returns inclusive of all attachments and schedules from 2016 to present. You did not provide any W2s or 1099s. Please provide all W2s, K1s, and 1099s for the past 6 tax years.
- 3. Number 3: Education and Training.** Please provide Ms. Guritz's history of education, including any classes or training for degrees that may not have been completed. Please provide documentation for any licenses or certifications Ms. Guritz presently holds or has held from 2016 to present. You did not provide any information regarding Ms. Guritz's history of training or any documentation for any licenses or certifications Ms. Guritz currently

holds or has held from 2016 to present. Please provide this information and documentation for any licenses or certifications.

4. **Number 4: Income. Please provide Ms. Guritz's paystubs or other documentation demonstrating her income, from any source including inheritance, from 2016 to present.** You provided no documentation. Please provide copies of paystubs from your client's current employer, as well as all documentation and statements showing deposits/withdrawals of your client's alleged non-marital inheritance.
5. **Number 5: Expenses. Please provide a listing of Ms. Guritz's monthly expenses and supporting documentation. Provide a listing of current expenses and projected expenses following dissolution.** You provided no documentation. You indicated that this information would only be provided if spousal maintenance is an issue at trial. Please explain why this is only applicable for trial purposes or provide requested documents.
6. **Number 7: Debts. Please provide all statements from January 1, 2016, to present for all debts for which Ms. Guritz has, individually or jointly, or in the name of a third party on her behalf, whether revolving or non-revolving debt accounts, including but not limited to: credit card or other account statements, invoices, bills, promissory notes, or student loans.** You provided no documentation. Please explain your objections further or provide requested documents and statements.
7. **Number 8: Credit Report. Please provide a copy of Ms. Guritz's current credit report.** You provided no documentation. Please provide Ms. Guritz's current credit report.
8. **Number 10: Depository Accounts. Please list the name(s) of the financial institutions and provide all statements from January 1, 2016 to present for any and all checking or saving accounts in Ms. Guritz's name, individually or jointly whether the accounts have been closed or presently remain open.** You provided no documentation. Please explain your objections further or provide requested documents and statements.
9. **Number 11: Retirement Accounts. Please list the name(s) of the financial institutions and provide all statements from January 1, 2016 to present for any and all retirement**



**accounts in Ms. Guritz's name or under her control whether the accounts have been closed or presently remain open.** You provided no documentation and stated Ms. Guritz has no retirement accounts. Due to Ms. Guritz's employment tenure of 18 years, it is highly unusual for an employee to not have any retirement accounts or options. Please provide documentation from your client's employer that no such retirement account(s) exist on behalf of your client.

**10. Number 13: Other Assets. Please list any other assets of Ms. Guritz that have not yet been disclosed, including but not limited to, cash, real property, business interests, trust accounts, social security, pending settlements or awards from litigation, etc.** You provided no documentation. Please provide any documentation from Pampered Farmhouse, LLC, Ms. Guritz's inheritance, and any other assets not disclosed by Ms. Guritz.

**11. Number 14: Non-Marital Property. If Ms. Guritz is claiming a non-marital interest in any property believed to be non-marital as defined by Minn. Stat. Section 518.17, please list the property, the value of the property, the reason believed for it being nonmarital, and produce any document(s) showing said property interest is non-marital.** You provided no documentation. Please provide the information and supporting evidence for Ms. Guritz's non-marital claim, tracing documentation, deposit/withdrawal statements for the inheritance.

While I hope we can resolve this between our clients and without additional court involvement, your client must comply with discovery. I need all the requested documents no later than Monday, November 06, 2023.

Sincerely,  
*/s/ Laura Blatti*  
Laura Blatti

Cc Ryan Guritz (via email)