



July 8, 2024

Via EFS

Jacob M. Birkholz  
Birkholz & Associates  
121 St. Andrews Court  
Mankato, MN 56001

**RE: In Re the Marriage of Honeman, David vs. Carol Honeman**  
**Court File No.: 08-FA-24-195**

Dear Mr. Birkholz,

In reviewing your discovery responses dated May 23, 2024, we noted multiple deficiencies to the request for production of documents, which are outlined below. Please provide the following missing documents no later than July 24, 2024 to ensure we have time to review all the documents prior to mediation.

7. **Bank Accounts.** Provide copies of monthly statements from January 1 2022 to the present for any and all checking accounts, savings accounts, or depository accounts held by you individually or jointly, used by you, or in which you have or have had an interest.

**Deficiency:**

The following statements were not provided for Bank Midwest Checking x1108:

1. 2022-01-01 to 2023-06-30;
2. 2023-08-01 to 2023-09-30;
3. 2023-11-01 to 2023-11-30; and
4. 2024-03-01 to 2024-04-30.

11. **Credit Cards.** Provide copies of monthly statements from January 1, 2022, to the present for any and all credit cards in your name, or to which you have used or have access, including business credit cards.

**Deficiency:**

The following statements were not provided:

1. 2022-01-01 to 2024-05-30 Chase Credit Card x8478;
2. 2022-01-01 to 2024-05-30 Chase Credit Card x0287; and
3. 2022-01-01 to 2024-05-30 Chase Credit Card x2106.

22. **Credit Report.** Provide a copy of your current credit report.

**Deficiency:** No credit report was provided.

Sincerely,

*/s/ Jason C. Kohlmeier*

Jason C. Kohlmeier  
Attorney

cc: Mr. David Honeman (via email only)