

Neal vs. O'Neal
Case No. 07-23744 FC 01

IN THE CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
IN AND FOR MIAMI-DADE COUNTY, FLORIDA

FAMILY DIVISION

CASE NO. 07-23744 FC 01

IN RE: The Marriage of

SHAQUILLE R. O'NEAL,

Petitioner/Husband

And

VA'SHAUNDYA NELSON O'NEAL,

Respondent/Wife.

FILED FOR
2007 OCT 30 PM 3:54
CIRCUIT COURT OF THE ELEVENTH JUDICIAL CIRCUIT
MIAMI-DADE COUNTY, FLORIDA
Family Division
Willie Wilson
NOV 01 2007

WIFE'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO HUSBAND

Pursuant to Rule 12.350, Fla. Fam. L.R.P. and Rule 1.350, Fla. R.Civ.P., you are requested to produce for inspection and copying the documents and records set forth hereafter at the offices of Elser & Foster Morales, LLC, located at 44 West Flagler Street, Suite 2100, Miami, FL 33130. Within thirty (30) days of this Notice please produce the items on the attached Schedule.

CERTIFICATE OF SERVICE

WE HEREBY CERTIFY that a true and correct copy of the foregoing was furnished via facsimile : and regular U.S. Mail on this 25th day of October, 2007, to Ira M. Elegant, Esq., BUCHBINDER & ELEGANT, P.A.,

ELSER & FOSTER-MORALES, LLC.

Attorneys for Respondent/Wife
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By: Marsha B. Elser
Marsha B. Elser
Florida Bar No. 198821

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WIFE'S FIRST REQUEST FOR PRODUCTION TO HUSBAND

The following is a list of documents, books and records required to be produced:

1. Federal and State Income Tax Returns for Shaquille O'Neal for the calendar years, 2004, 2005 and 2006.
2. Each Personal Financial Statement prepared by or on behalf of Shaquille O'Neal from January 1, 2004 through and including the present date.
3. A copy of Shaquille O'Neal's current Player Contract with The Miami Heat and all predecessor contracts with The Miami Heat.
4. A copy of the Contracts for Endorsements or Personal Appearance of Shaquille O'Neal from January 1, 2005 through and including the date of production.
5. A copy of each and every Deed to all real property currently owned whether held in the name of Shaquille O'Neal individually, together with another person or persons, or in the name of a Trust which was formed by him or in which he is a Trustee or a beneficiary.
6. A copy of each and every Life Insurance Policy in effect on the life of Shaquille O'Neal from January 1, 2005 through the present date. This should include a copy of the Policy, a copy of each Statement of the value of the Policy.
7. Each Payroll Tax Return from January 1, 2005 through and including the present date for all household employees in the residence on Star Island Drive or the residence in Orlando. Please include all W-2's for each employee.
8. A copy of each and every Trust document for any Trust that was created by the Husband, funded by the Husband or which the Husband is a Trustee or Beneficiary from January 1, 2002 through and including the present date.

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9. Each and every Trust, Estate or Gift Tax Return filed by Shaquille O'Neal from January 1, 2005 through and including the present date.
10. All reports relating to Household expenses made for the home at 26 Star Island as well as the Orlando property from January 1, 2005 through present. These include, but are not limited to:
 - a. Mortgage
 - b. Property taxes
 - c. Homeowner's/Windstorm insurance
 - d. Homeowner's Association fees
 - f. Electricity
 - g. Water, garbage and sewer
 - h. Fuel or natural gas
 - i. Telephone
 - j. Repairs and maintenance
 - k. Lawn care
 - l. Pool maintenance
 - m. Pest control
 - n. Misc. household
 - o. Cable TV
 - p. Alarm service
 - q. Service contract on appliances
11. All reports, cancelled checks or other evidence of payments relating to all expenses made for the benefit of the Wife and/or the children and/or the parties' household help from January 1, 2005 through present. These include, but are not limited to:
 - a. Food and home supplies
 - b. Meals outside the home
 - c. Cell phone service
12. All reports relating to salaries paid to any household help at 26 Star Island and/or the Orlando property from January 1, 2005 through present. These include, but are not limited to:
 - a. Nannies – Full and part time
 - b. Housekeepers
 - c. Assistants
 - d. Chefs
 - e. House Manager
13. All W-2 Forms for the years 2005 and 2006 for any of the household help listed in #12.
14. All reports relating to automobile expenses paid on behalf or for the benefit of the Wife and/or the children from January 1, 2005 through present. These include:
 - a. Gasoline
 - b. Auto repairs

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- c. Tags
 - d. Insurance
 - e. Lease or financing payments
 - f. Car rental expenses
 - g. Limousine
 - h. Tolls and parking
15. All reports, cancelled checks, or any other evidence of payments relating to expenses paid on behalf or for the benefit of the children from January 1, 2005 through present. These include, but are not limited to:
- a. Babysitting or daycare
 - b. School tuition, supplies, misc. fees, etc.
 - c. After school activities
 - d. Lunch money
 - e. Private lessons or tutoring
 - f. Allowances
 - g. Clothing and uniforms
 - h. Entertainment
 - i. Health insurance
 - j. Medical/Dental/Prescription expenses
 - k. Psychiatric/Psychological/Counselor
 - l. Orthodontic expenses
 - m. Vitamins
 - n. Grooming
 - o. Non-prescriptions/Cosmetics/Toiletries
 - p. Gifts from children
 - q. Summer camp
 - r. Clubs
16. All reports relating to insurance expenses paid on behalf or for the benefit of the Wife from January 1, 2005 through present. These include, but are not limited to:
- a. Health insurance
 - b. Life insurance
 - c. Dental insurance
 - d. Umbrella policy
 - e. Disability, long-term care
17. All reports cancelled checks, and any other evidence of payments relating to personal expenses paid on behalf or for the benefit of the Wife from January 1, 2005 through present. These include, but are not limited to:
- a. Dry cleaning and laundry
 - b. Clothing
 - c. Un-reimbursed medical, dental or prescription expenses
 - d. Psychiatric/Psychological/Counselor
 - e. Non-prescriptions/Cosmetics/Toiletries
 - f. Grooming

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- g. Gifts
 - h. Pet expenses
 - i. Club dues and memberships
 - j. Sports and hobbies
 - k. Entertainment
 - l. Periodicals/Books/Cds
 - m. Vacations
 - n. Donations
 - o. Bank charges and credit card fees
 - p. Education expenses
18. If the above expenses #10 through 17 with their attached letters therein are being recorded using accounting software such as QuickBooks, please provide the time period January 1, 2005 through present on CD in lieu of the printed reports.
19. All documents relating to the Mountain Lake Partners, LLC investment.
20. All documents relating to purchase of the Ritz Carlton Residence in Los Angeles.
21. All documents relating to the following vehicles:
- a. 2007 Infiniti QX56
 - b. 2006 Mercedes 550
 - c. 2005 BMW
 - d. Electric Golf Cart
22. All documents relating to jewelry purchased or jewelry rider insurance policy from January 1, 2005 to the present.
23. Copies of credit cards statements in the name of the Wife or being used by or on behalf of or for the benefit of the Wife and/or children for the period Jan. 1, 2005 through present, including but not limited to:
- a. American Express
 - b. MasterCard
 - c. Chevron Gas Card
 - d. Publix account under the name Mine O' Mine
 - e. Epicure account under the name Onesh
 - f. Albertsons account
 - g. Sysco account
24. Copies of all credit card statements for any credit card used by the Husband from January 1, 2005 through the present.