

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA**

**TRONDHEIM CAPITAL PARTNERS LP *
and MTP 401K PLAN ***

Plaintiffs *

vs. *

Case No. 4:19 -cv-01413-KOB

**LIFE INSURANCE COMPANY OF *
ALABAMA, MARVIN LYNN LOWE, *
RAYMOND RUDOLPH RENFROW. JR., *
ANN DAUGETTE RENFROW, ROSALIE *
RENFROW CAUSEY, ALBURTA *
DAUGETTE LOWE, and CLARENCE *
WILLIAM DAUGETTE, III ***

Defendants *

**LIFE INSURANCE COMPANY OF *
ALABAMA ***

Nominal Defendant *

DEFENDANTS' INITIAL DISCLOSURES

COMES NOW, RAYMOND RUDOLPH RENFROW, JR., (“Renfrow”), ANNE DAUGETTE, (“Daugette”), ROSALIE RENFROW CAUSEY, (“Causey”), ALBURTA DAUGETTE LOWE, (“Lowe”), CLARENCE WILLIAM DAUGETTE, III, (“Daugette, III”), and LIFE INSURANCE COMPANY OF ALABAMA, (“LICOA”), and hereby, in their individual capacities and, derivatively, serve their Initial Disclosures pursuant to Rule 26(a)(1)(A) of the Federal Rules of Civil Procedure as follows:

Rule 26(a)(1)(A)(i)

The name and, if known, the address and telephone number of each individual likely to have discoverable information - along with the subjects of that information - that

the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:

1. Raymond Rudolph Renfrow, Jr.

Mr. Renfrow, Jr., is an Officer and Director of LICOA who has knowledge of facts and matters alleged in the Complaint and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

2. Anne Daugeette Renfrow

Ms. Renfrow is a Director who may have knowledge of facts and matters alleged in the Complaint and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

3. Rosalie Renfrow Causey

Ms. Causey is an Officer and Director of LICOA who has knowledge of facts and matters alleged in the Complaint and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

4. Alburta Daugeette Lowe

Alburta Daugeette Lowe is a Director who may have knowledge of facts and matters alleged in the Complaint and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

5. Clarence William Daugette, III

Mr. Daugette is President of LICOA who may have knowledge of facts and matters alleged in the Complaint and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

6. The Lightfoot Law Firm/Glenn Waldrop/Jackson Sharman - 400 20th Street North, Birmingham, AL 35203.

The Lightfoot Law Firm/Glenn Waldrop/Jackson Sharman who may have knowledge of the independent investigation of Plaintiffs' claims.

7. Ray Smith

Mr. Smith who may have knowledge of facts and matters alleged in the Complaint and the independent investigation by The Lightfoot Law Firm and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

8. Warren Cobb

Mr. Cobb who may have knowledge of facts and matters alleged in the Complaint and the independent investigation by The Lightfoot Law Firm and can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656.

9. Steven Keck

Mr. Keck who may have knowledge of facts and matters alleged in the Complaint, including specifically information regarding the requests for information and can be

contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656..

10. Ben Cohen

Mr. Cohen who may have knowledge of actuarial matters involving LICOA and who can be contacted through F. Michael Haney, 235 Broad Street, Gadsden, AL 35901, E-Mail: mikehaney@bellsouth.net, Telephone: (256) 546-1656..

10. F. Michael Haney

Mr. Haney who may have knowledge of the shareholder inspection requests.

12. All of the persons named in Paragraph 1-10 of Plaintiffs' initial disclosures who have knowledge of the facts identified in the initial disclosures.

Rule 26(a)(1)(A)(ii)

A copy - or a description of category and location - of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

Defendants identify the following categories of documents:

1. Documents produced by LICOA in response to shareholders requests for information.
2. Publicly available information regarding historical share prices of LICOA.
3. Documents produced by the Plaintiffs to Defendants.
4. E-mail and other correspondence between Plaintiffs and Defendants.
5. Documents reflecting purchase of LICOA shares.

Rule 26(a)(1)(A)(iii)

A computation of each category of damages claimed by the disclosing party - who must also make available for inspection and copying under Rule 34 the documents or other evidentiary material, unless privileged or protected from disclosure, on which such computation is based, including materials bearing on the nature and extend of injuries suffered:

1. Not applicable.

Rule 26(a)(1)(A)(vi)

For inspection and copying as under Rule 34, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

1. Not applicable.

THIS the 11th day of November, 2020.

Respectfully submitted,

/s/ F. Michael Haney

F. Michael Haney

Attorney for Defendants

Inzer Haney McWhorter & Haney LLC

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/s/ Charles A. Dauphin

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CERTIFICATE OF SERVICE

I hereby certify that on this the 11th day of November, 2020, I have served a copy of the above and foregoing on counsel for all parties by using the CM/ECF system which will send notification of such to:

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/s/ F. Michael Haney
Of counsel