UNITED STATES DISTRICT COURT
for the
WESTERN DISTRICT OF WISCONSIN

Randy Red,	)	
	)	
Plaintiff(s)	)	
	)	
	)	
	)	Civil Action No. 4321
Big Box Mart, Inc.,	)	
	)	
Defendant(s)	)	
	)	

REQUEST TO PRODUCE DOCUMENTS AND TANGIBLE THINGS,
OR TO ENTER ONTO LAND UNDER RULE 34

The plaintiff Randy Red requests that the defendant Big Box Mart, Inc. respond within 30 days to the following requests:

1. To produce and permit the plaintiff to inspect and copy and to test or sample the following documents, including electronically stored information:

a. Any/All e-mail correspondence between Big Box CEO William Baker and Big Box Madison East store manager Daryl Dickinson dated from February 1, 2024 to December 31, 2024.

b. Any/All e-mails relating to hiring for the position of Madison East store hardware department manager.

c. Randy Red's annual job performance evaluations dating back to the year of his hire, 1999.

The plaintiff further requests that the defendant produce the above-identified electronically stored information in the form of a USB Flash Drive, to be mailed to the plaintiff's counsel at the address provided below no later than the close of business on Friday, January 9, 2025.

Dated this 16th day of December, 2025.

Smith & Anderson
Attorneys for the Defendant

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Jack Graue

State Bar No. 3088710

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