

1. Please identify each and every employee of [Company] who has worked under a SAG-AFTRA, SAG, or AFTRA contract at any time between April 1, 2013, and today's date. Please also provide each identified employee's address, phone number, and email address.

2. For each employee identified in response to question 1, please identify each production for which the Company engaged that employee.

3. With respect to each production identified in question 2, please provide any documents specifying and/or substantiating the relationship between [Company] and that production, including but not limited to any contract between the [Company] and the advertising agency and/or any contract between the [Company] and the advertiser. For the purpose of this request, "relationship" is understood to mean the particulars of the arrangement according to which [Company] supplied services or functioned in support of the production, including, but not limited to, employees, payroll services, budget analysis, consulting, production, and logistics.

4. For each production identified in question 2, please identify the following:

- a. the Advertiser;
- b. the Advertising Agency

5. With respect to each employee identified in question 1, please identify which of the following supervisory functions [Company] performed, or was authorized to perform, and to what extent; and provide any and all documents which reference or reflect such function:

- a. Determine wages and/or benefits;
- b. Hire, recruit, identify, and/or recommend employees for particular productions; and/or set minimum standards for hiring;
- c. Determine hours worked or work schedule;
- d. Authorize overtime;
- e. Assign work and the manner or the method in which such services were performed, and by whom;
- f. Determine the order in which services were performed;
- g. Training and/or safety instruction;
- h. Monitor and/or evaluate employee performance or dismiss, fire, or otherwise discipline performers;
- i. Remove and/or reassign employees from a production;
- j. Maintain records of employment;

- k. Adjust grievances or complaints or make recommendations concerning the same;
- l. Reward performance;
- m. Provide performers any directions before or during the production (where to stand on set, how to say lines).

6. For each agency and advertiser identified in question 4, with respect to each identified [Company] employee working on each production referenced in question 2:

- a. please identify which supervisory functions (listed in question 5(a) to 5(m)) that the agency or advertiser performed, or was authorized to perform, and to what extent; and provide any and all documents which reference or reflect such function; and
- b. identify whether the agency or advertiser:
 - 1) had the right to set minimum standards for the hiring of [Company's] employees;
 - 2) had the right to reject or discontinue any of [Company's] employees;
 - 3) controlled the pace of work of [Company's] employees;
 - 4) exercised any oversight over the work performance of [Company's] employees, and if so, to what extent;
 - 5) issue directives to [Company's] employees both directly and through [Company's] supervisors;
 - 6) determine the number of [Company's] employees and their shifts;
- c. For each item identified in sub-question (b) above, please provide all documents that reference or reflect such function.