

Exhibit A

SCHEDULE A TO SUBPOENA TO CALIFORNIA BANK & TRUST

DEFINITIONS AND INSTRUCTIONS

1. The term “Action” means the proceeding, *Hannan v. The Tulving Company, Inc.*, No. 5:14-cv-01054-EJD (N.D. Cal.)

2. “Tulving” refers to the defendant in the Action, Hannes Tulving, Jr.

3. “Tulving Company” refers to the defendant in this action, The Tulving Company, Inc.

4. “CB&T,” “You” and “Your” refer to California Bank & Trust.

5. “Account” refers to accounts of any type maintained by CB&T customers, including but not limited to deposit accounts (such as checking, savings, or other such similar accounts); debt accounts (including secured and unsecured debt); investment accounts; and safe deposit boxes.

6. “Tulving Account” refers to the CB&T Account ending in the digits 2481, in the name of The Tulving Company, Inc. and/or Hannes Tulving, Jr.

7. To the extent documents or data requested exist in electronic form, please produce the documents or data in an electronic form usable by Plaintiff.

8. If there are no documents in Your possession, custody, or control that are responsive to a particular request, so state and identify such request.

9. If any document(s) responsive to these requests are known by You to exist but are not in Your possession, custody, or control, identify said document(s) and the person who has possession, custody or control thereof.

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REQUESTS FOR THE PRODUCTION OF DOCUMENTS

1. Documents sufficient to show all Accounts held at CB&T by Tulving and/or Tulving Company.

2. Documents sufficient to identify all names, physical addresses, PO boxes, electronic addresses (including email addresses), telephone numbers, or other customer identifying information that are or have been associated with the Tulving Account.

3. Documents sufficient to identify all names, physical addresses, PO boxes, electronic addresses (including email addresses), telephone numbers, or other customer identifying information that are or have been associated with other Accounts held at CB&T by Tulving and/or Tulving Company.

4. Document sufficient to show all transactions on the Tulving Account from January 1, 2013 to the present, including, for any transactions, any information in CB&T's possession concerning the destinations or origins of transactions into or out of the Tulving Account.

5. Document sufficient to show all transactions on the Tulving Account from January 1, 2013 to the present, including, for any transactions, any information in CB&T's possession concerning the destinations or origins of transactions into or out of other Accounts held at CB&T by Tulving and/or Tulving Company.

6. All Documents reflecting communications with Tulving and/or the Tulving Company from January 1, 2013 to the present.