

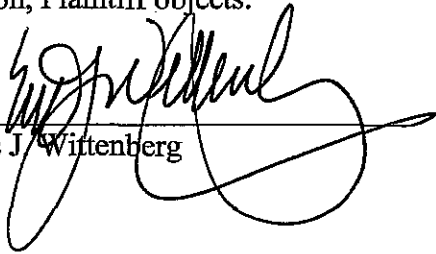
IN THE COURT OF COMMON PLEAS, FRANKLIN COUNTY, OHIO

ADAM J. STEIGER,)	
)	
Plaintiff,)	
)	Case No. 05 CVE 10-11582
v.)	Judge Bender
)	
LEADER TECHNOLOGIES, INC.,)	
Defendant)	

**PLAINTIFF'S ANSWERS TO INTERROGATORIES PROPOUNDED BY
DEFENDANT LEADER TECHNOLOGIES, INC.**

Now comes Plaintiff, Adam J. Steiger, and propounds the following as his Answers to the Interrogatories propounded by the Defendant, Leader Technologies, Inc.

GENERAL OBJECTION: To the extent that any of these interrogatories request evidence that violates the attorney-client privilege, and to the extent that these interrogatories request evidence that is irrelevant, unduly burdensome, or which seeks the discovery of sensitive and confidential information, Plaintiff objects.



Eric J. Wittenberg

INTERROGATORY NO. 1:

Identify each person who provided any information or documents or assisted you in formulating answers or responses to any of the foregoing or following discovery requests.

ANSWER:

Adam J. Steiger

INTERROGATORY NO. 2:

Identify each person who you believe has knowledge of the circumstances underlying this lawsuit, along with their current address and telephone number, and the nature of their knowledge or information.

ANSWER:

Michael McKibben: as chairman, CEO, president, and/or controlling intrestholder/ shareholder of the company and as a defendant in this case, Mr. McKibben has full knowledge of all issues in this litigation.

Ben Zacks: as former general counsel to the company and as a shareholder, Mr. Zacks has direct knowledge of Plaintiff's investment and of any repayment of the loans. He would also be aware of any amounts that remain due and owing.

Karen Houser: as the former business manager and corporate secretary of Leader, Ms. Houser has knowledge of what was owed to the Plaintiff and as to sending the corporate resolutions to the Plaintiff indicating the nature of the debt.

Michael Greulich: as secretary of the corporation, Mr. Greulich also signed the action of the managers that indicated that Plaintiff was owed money by the company.

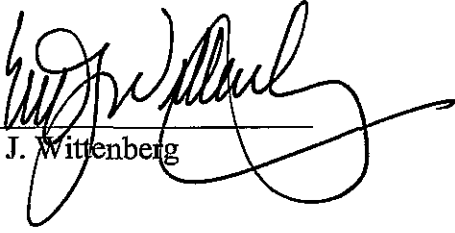
Jerry Scott: As the subsequent chief executive officer of Leader, Plaintiff corresponded with Mr. Scott as to the amounts due and owing to the Plaintiff.

INTERROGATORY NO. 3:

Identify each person with whom you have communicated regarding any allegation in your complaint or amended complaint and the details of each communication, including the times and dates of such communication.

ANSWER:

Objection. This interrogatory calls for the violation of the attorney-client privilege. Without waiving such privilege or this objection, these individuals include Eric J. Wittenberg and Mark S. Miller.


Eric J. Wittenberg

INTERROGATORY NO. 4:

Describe the investment to which you refer in paragraph 22 of your Amended Complaint.

ANSWER:

The investment consisted of money and time in exchange for interests in the company, which interests have been consistently devalued based upon the self-dealing of Mr. McKibben. McKibben's persistent self-dealing and breaches of fiduciary duty have essentially rendered my investment worthless.

INTERROGATORY NO. 5:

Describe the circumstances surrounding your receipt of 2,025,000 Membership Units in Leader LLC in 2000 and 2001 and specifically, what you provided for such units.

ANSWER:

Objection. This interrogatory is vague, ambiguous, and lacks certainty. Without waiving such objection, in return for making his cash investment in the company, Plaintiff received founder's membership in an amount unilaterally determined by Mr. McKibben and then subsequently received additional founding member and other types of units for additional services provided by him to the company. In addition, documents that reflect the answer to this interrogatory are in the sole custody and control of Leader, so I cannot reference them specifically. Leader should certainly be aware of the contents of its own documents.


Eric J. Wittenberg

INTERROGATORY NO. 6:

Explain in detail circumstances supporting your allegation in paragraph 25 of your Amended Complaint that "Defendant McKibben, despite the corporate structure, has treated LTI as a sole proprietorship so that it is the alter ego of Defendant McKibben."

ANSWER:

In numerous conversations, McKibben told me or had others tell me that my dissent did not matter, since he had both controlling interest in the company as well as that he had locked everyone else out of any decision-making input. In all situations, McKibben was controlling owner and shareholder, and often stated that dissenters were ignored for McKibben's own personal benefit. Mr. McKibben created a corporate structure to prevent investors from exerting any influence over the company's business plan or to dilute his interests during the start-up phase of the business, and prior to delivering its completed product and following through on its promises to investors. Subsequently, Mr. McKibben used the powers granted to him to silence critics, sway opinions and dictate company direction (since his wishes were an inevitability, it made less and less sense for people involved to challenge McKibben's point of view) and profit individually at the expense of others (through shares granted to McKibben, dilution of others and corporate expenditures on personal needs), and through the failure to perform contractual agreements (first rights of investment notifications).

INTERROGATORY NO. 7:

Please provide an accounting of damages alleged in paragraphs 27 and 32 of your Amended Complaint.

ANSWER:

Dilution of shares, improbability of success of company, self-dealing of management, impugning the reputation of company, withholding critical information from investors, failure to inclusively distribute annual reports to investors. The Plaintiff has yet to place a value on these damages. When he has done so, this Answer will be reasonably updated.

INTERROGATORY NO. 8:

Please provide all known instances where McKibben, Leader or Leader LLC distributed shares of stock to creditors without receiving fair consideration for those shares of stock and/or diluted your holdings as set forth in paragraph 30 of the Amended Complaint.

ANSWER:

As payment to law firms for services rendered, including Chandler, Fenwick & West and Rishel & Reinhardt

The company that Leader merged with that sells Leader's product (I cannot recall its name)

John Butler of anysystems.com

INTERROGATORY NO. 9:

Please describe how McKibben treated LTL and LTI as his alter ego, as alleged in paragraph 33 of your Amended Complaint.

ANSWER:

Mr. McKibben regularly made material misrepresentations and false statements about his ability to execute business plans to cause reliance on his personal abilities to obtain investment dollars and introductions to others and even claimed personal ownership of all intellectual property developed by himself and others. He made

corporate expenditures for personal reasons, planned personal trips to coincide with company business using company funds to pay for trip, hired relatives to work for company at non market rates, provided inside information to certain investors that he favored to the exclusion of other investors, controlled checkbook and favored certain creditors over others, used leverage of company opportunities for personal gain, figured the conversion to maintain personal control of company, turned away legitimate investors from investing in company if they did not accept his personal control, because of his alter ego he placed his personal opportunities before corporate opportunities, reimbursed personal expenses of himself prior to paying corporate expenses and company creditors of both LTL and LTI, used ability to issue membership interests for personal gain and dilute members other than himself, used ability to issue stock for personal gain and to dilute shareholders other than himself, used company funds to buy equipment and supplies in quantities that would permit him to use the excess for personal reasons.

INTERROGATORY NO. 10:

Please provide your accounting and methodology for the demand for damages of \$1.5MM in paragraphs C, D and E of your Amended Complaint.

ANSWER:

My counsel selected this amount as appropriate to punish the Defendant and Third-Party Defendant for their illegal conduct.

INTERROGATORY NO. 11:

Explain your positions held and duties performed for Leader LLC and/or Leader, including any offices held, the dates of such positions, compensation received for such services.

ANSWER:

Ohio Code of Professional Responsibility then in effect: Canon 7 A Lawyer Should Represent a Client Zealously Within the Bounds of the Law -- EC 7-6 "...obviously, he [an attorney] may not do anything furthering the creation or preservation of false evidence."

Founding member based on exchange contract. Times when he called me a Director, a Partner or an Assistant Driver but officially was only a founding member.

INTERROGATORY NO. 12:

Please list any person you plan to call as a witness in this matter, along with their addresses, telephone numbers and a general description of their anticipated testimony.

ANSWER:

Nick Coscia	Tim Cook	Ben Zacks
Lawler Kang	Jim Billings	Ed Detweiler
Susie Kennedy	Jim Berliner	Steve Engle
Mark Kolb	Evan Rogell	Michael Solondz
Pradeep	Tina Giustino	Karen Houser
Via	Theresa Lamb	Michael Greulich
Peter Schmaus	Sky Woo	Jerry Scott
Michael McKibben	Columbe Nicholas	Dave Sorkow
Nancy McKibben	Joe Deangelis	Mike Kennedy
Kerry McKibben	Michael Leventon	Mike Chase
Jeff Lamb	Marcus Dunn	Jerry Rampelt
Brad Whiteman	Steve Shirk	Esther Barrack
Peter Klisares	Steve Hopkins	Max McKibben
Jim Freeze	Jim Chandler	

Each of these individuals will testify as to the business practices spelled out in the Plaintiff's Amended Complaint. As others are identified, this answer will be updated.

INTERROGATORY NO. 13:

Identify each person with whom you have communicated regarding loan or interest repayment of the Loan Agreement and the details of such communications.

ANSWER:

Karren Houser
Jerry Scott
Ben Zacks
Michael Greulich

Michael McKibben: as chairman, chief executive officer, president, and/or controlling interest holder/ shareholder of the company and as a defendant in this case, Mr. McKibben has full knowledge of all issues in this litigation.

Ben Zacks: as former general counsel to the company and as a shareholder, Mr. Zacks has direct knowledge of Plaintiff's investment and of any repayment of the loans. He would also be aware of any amounts that remain due and owing.

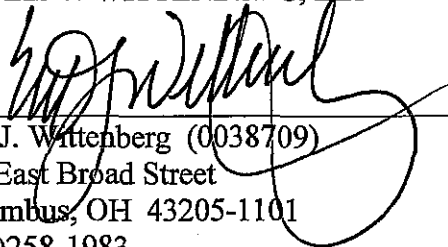
Karen Houser: as the former business manager and corporate secretary of Leader, Ms. Houser has knowledge of what was owed to the Plaintiff and as to sending the corporate resolutions to the Plaintiff indicating the nature of the debt.

Michael Greulich: as secretary of the corporation, Mr. Greulich also signed the action of the managers that indicated that Plaintiff was owed money by the company.

Jerry Scott: As the subsequent chief executive officer of Leader, Plaintiff corresponded with Mr. Scott as to the amounts due and owing to the Plaintiff.

Respectfully submitted,

KRUPMAN, GOLDEN, MEIZLISH,
MARKS & WITTENBERG, LLP



Eric J. Wittenberg (0038709)

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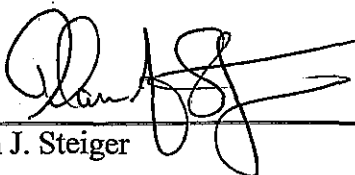
Attorney for Plaintiff

VERIFICATION

STATE OF NEW JERSEY:
COUNTY OF _____:

I hereby verify that the foregoing Answers to Interrogatories are, to the best of my information and knowledge, true and correct.

5/4/06

Adam J. Steiger

KARIN BALLESTEROS
NOTARY PUBLIC OF NEW JERSEY
MY COMMISSION EXPIRES SEPTEMBER 13, 2006


CERTIFICATE OF SERVICE

I hereby certify that I served, via ordinary U. S. mail, postage prepaid, a copy of the foregoing Answers to Interrogatories upon:

Mark S. Miller
Co-counsel for Plaintiff
DANA & PARISER CO., LPA
800 East Broad Street
Columbus, OH 43205

Karen S. Hockstad
Attorney for Defendant
HOCKSTAD LAW OFFICE, LTD.
471 East Broad Street, Suite 800
Columbus, OH 43215

this 5 day of May, 2006.



Eric J. Wittenberg