

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF FLORIDA
PENSACOLA DIVISION**

SPORT & WHEAT CPA PA,
a Florida corporation, individually and
on behalf of a class of similarly situated
businesses and individuals,

Plaintiff,

v.

SERVISFIRST BANK INC.;
SYNOVUS BANK; et al.,

Defendants.

Case No. 3:20-cv-5425-TKW-HTC

**PLAINTIFF’S CONSOLIDATED DISCOVERY REQUESTS TO
DEFENDANT SYNOVUS BANK**

Plaintiff serves these consolidated discovery requests on Defendant Synovus Bank.

INSTRUCTIONS

1. All electronically stored information is to be produced in its unaltered native format.
2. If information stored in, or accessible through, computers or other data retrieval systems is produced, it must be accompanied with instructions and all other materials necessary to use or interpret such data, including any data dictionaries or other descriptive materials.

15. The use of the singular form includes the plural and vice versa.
16. The terms “all,” “any,” and “each” shall each be construed as encompassing any and all.

REQUESTS FOR PRODUCTION

1. Every PPP-related document and communication exchanged between the Bank and Plaintiff.
2. Every document that contains Plaintiff’s name or other identifying information.
3. The file the Bank maintains for each PPP Loan for any Borrower where Plaintiff was used as a PPP Agent, including but not limited to: the PPP Loan application itself; all communications with anyone regarding that particular PPP Loan; all documents prepared and sent to or from the Small Business Administration; any internal correspondence, e-mails, or notes within the Bank regarding that PPP Loan.¹
4. Every PPP-related document and communication exchanged between the Bank and any Borrower whom the Bank knew or believed was using Plaintiff as a PPP Agent.

¹ On request, Plaintiff will supply the Bank with sufficient information to identify all such Borrowers.