

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

3D GLOBAL SOLUTIONS )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
MVM, INC, )  
 )  
Defendant )  
\_\_\_\_\_ )

Case No.: 1:06cv00722 (GK)

Requesting Party: MVM  
Responding Party: 3D Global Solutions

To: MVM, Inc.  
C/O Mr. Herbert S. Rosenblum, Esquire  
Counsel for Defendant  
526 King Street, Suite 211  
P.O. Box 58  
Alexandria, Virginia 222313-0058

**RESPONSE TO DEFENDANT’S FIRST REQUEST FOR ADMISSIONS**

The Responding Party, 3D Global Solutions, by and through its attorneys, hereby responds to the Requests for Admissions submitted by the Requesting Party as follows:

**Request No. 1**

Denied. Defendant’s, MVM, exhibit B has never been a part, an addendum, an appendix or in any way associated with the Afghanistan contract between 3D Global Inc. and MVM, Inc.

To the extent that a question regarding TCN qualifications remains, notwithstanding Plaintiff’s denial of the existence of the documents labeled exhibit B, 3D Global hired Wackenhut International, South America, to conduct language testing of TCNs. MVM employee Jayson Turner assisted 3D Global by vetting and approving each TCN before they were sent to Afghanistan.

**Request No. 2**

Denied.

**Request No. 3**

Admitted

**Request No. 4**

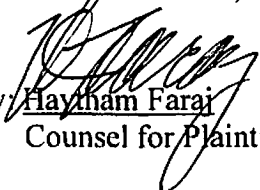
Defendant's question is vague and ambiguous. To the extent that the state department contract was cancelled due to a failure by some of the TCNs to speak English, is a factual matter in dispute. The letter from state department does not have any mention of the Peruvian guards not speaking English

**Request No. 5**

Admitted.

Date: November 5, 2009

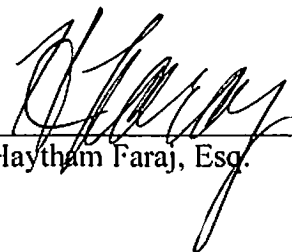
3D Global Solutions,

  
By Haytham Faraj  
Counsel for Plaintiff

Haytham Faraj, Esq.  
2181 Jamison Ave,  
Suite 1505  
Alexandria, Virginia 22314  
Telephone 888-970-0005 x2  
Fax 202-280-1039

**CERTIFICATE OF SERVICE**

I hereby certify that on this 5<sup>th</sup> day of November 2009, I sent a true copy by first class mail, facsimile and email plaintiff's response to defendant's First Request for Admissions to Defendant's counsel, Mr. Herb Rosenblum.

  
\_\_\_\_\_  
Haytham Faraj, Esq.