

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT, AT ANCHORAGE

**COPY**  
Original Received

**JAN 22 2016**

Clerk of the Trial Courts

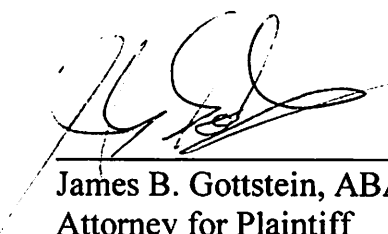
\_\_\_\_\_  
ALASKA BUILDING, INC., an Alaska )  
corporation, )  
Plaintiff )  
vs. )  
716 WEST FOURTH AVENUE LLC, and )  
LEGISLATIVE AFFAIRS AGENCY )  
Defendants. )  
\_\_\_\_\_

**REQUEST FOR  
IN CAMERA REVIEW**

Case No. 3AN-15-05969CI

Pursuant to the Court's invitation in its January 13, 2016 Order Regarding Alaska Building, Inc.'s Motion to Compel, Plaintiff Alaska Building, Inc., requests the Court conduct an *in camera* review of the operating agreement for 716 West Fourth Avenue LLC (716 LLC), including all amendments and any other agreements pertaining to the operation and/or management of 716 LLC. It is hard to identify in advance all of the possibilities the documents might contain that would be relevant to this action or lead to relevant evidence, but three things for which Alaska Building, Inc., was looking are (1) any agreement(s) to indemnify any person, (2) any other indications that the owners of 716 LLC knew the lease the subject of this action was not at least 10% below market rent and/or did not extend a real property lease, and (3) that 716 LLC otherwise does not have clean hands.

Dated January 22, 2016.

  
\_\_\_\_\_  
James B. Gottstein, ABA # 7811100  
Attorney for Plaintiff

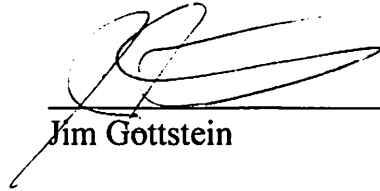
LAW OFFICES OF  
JAMES B. GOTTSTEIN  
406 G STREET, SUITE 206  
ANCHORAGE, ALASKA  
99501

TELEPHONE  
(907) 274-7686  
FACSIMILE  
(907) 274-9493

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this date he mailed a copy hereof and proposed order to Kevin M. Cuddy and Jeffrey W. Robinson/Eva R. Gardner.

Dated January 22, 2016.



---

Jim Gottstein

IN THE SUPERIOR COURT FOR THE STATE OF ALASKA  
THIRD JUDICIAL DISTRICT, AT ANCHORAGE

ALASKA BUILDING, INC., an Alaska  
corporation,

Plaintiff

vs.

716 WEST FOURTH AVENUE LLC, and  
LEGISLATIVE AFFAIRS AGENCY

Defendants.

**COPY**  
Original Received

**JAN 22 2016**

Clerk of the Trial Courts

Case No. 3AN-15-05969CI

**ORDER FOR *IN CAMERA* REVIEW**

Pursuant to the Plaintiff, Alaska Building, Inc.'s request at the Court's invitation in its January 13, 2016, Order Regarding Alaska Building, Inc.'s Motion to Compel, defendant 716 West Fourth Avenue LLC (716 LLC) is hereby **ORDERED** to produce to the Court for *in camera* review the operating agreement for 716 LLC including all amendments and any other agreements pertaining to the operation and/or management of 716 LLC.

Dated \_\_\_\_\_, 2016.

\_\_\_\_\_  
PATRICK J. McKAY,  
SUPERIOR COURT JUDGE

LAW OFFICES OF  
JAMES B. GOTTSTEIN  
406 G STREET, SUITE 206  
ANCHORAGE, ALASKA  
99501

TELEPHONE  
(907) 274-7666  
FACSIMILE  
(907) 274-9493