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January 9, 2009

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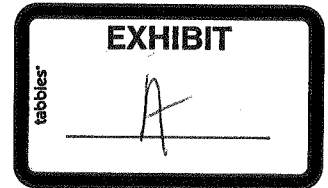
Of Counsel
George B. Ingebrand, Jr.
Randall L. Seaver

□ Also admitted in Arizona
∞ Also admitted in California
* Also admitted in Illinois
◇ Also admitted in Iowa
† Also admitted in Missouri
§ Also admitted in Montana
Δ Also admitted in North Dakota
+ Also admitted in Wisconsin
‡ Qualified Neutral (Rule 114)
* Certified Real Property Law Specialist
(Minnesota State Bar Association)
**Retired Status

James A. Lodoen
Lindquist & Vennum P.L.L.P.
4200 IDS Center
80 South Eight Street
Minneapolis, MN 55402

*VIA EMAIL
AND FIRST-CLASS MAIL*

Re: Petters Company, Inc., et al.
Case No. 08-45257



Dear Mr. Lodoen:

Enclosed and served upon you in connection with our Objection to the Appointment of Douglas A. Kelley as Trustee for all of the Debtors in These Jointly Administered Cases in the above-referenced matters, please find the following:

1. First Set of Interrogatories to Douglas A. Kelley;
2. First Set of Document Requests to Douglas A. Kelley; and
3. Notice of Deposition to Douglas A. Kelley.

Please note that in view of the January 27, 2009 hearing date, we have specified a return date of January 21, 2009, which effectively shortens the time period for response normally available under the Federal Rules of Civil Procedure made applicable to this proceeding by the Federal Rules of Bankruptcy Procedure. We are happy to discuss with you the prioritization of answers and responses to the accompanying discovery requests so we can facilitate obtaining the information we seek in advance of the hearing.

We would request, however, that you contact us at your earliest opportunity on Monday to confirm your willingness to abide by the return dates specified in our discovery requests. If we are unable to reach agreement in that regard, we will seek an order expediting discovery.

January 9, 2009

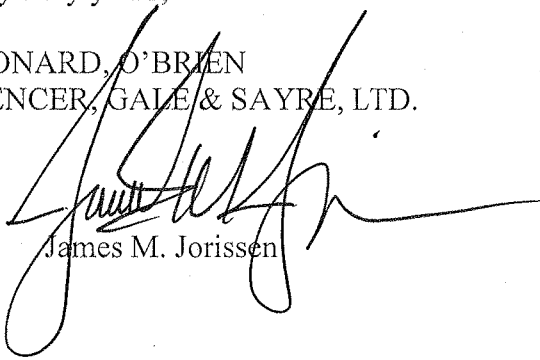
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Thank you for your attention to this matter.

Very truly yours,

LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.

By


James M. Jorissen

JMJ/vkr

Enclosures

cc: Michael Ridgway (via email and first-class mail)
Connie Lahn (via email and first-class mail)

393803

From: VALERIE RITTENBACH
To: connie.lahn@fmjlaw.com; jlodoen@lindquist.com ; mike.ridgway@usdoj.gov
Date: 1/9/2009 6:05:02 PM
Subject: Petters, Case No. 08-45257

Please see the attached discovery. You will also receive copies by mail.

Valerie Rittenbach
Legal Assistant
Leonard, O'Brien, Spencer, Gale & Sayre
100 South Fifth Street, Suite 2500
Minneapolis, MN 55402
612-332-1030

CC: Jorissen, James

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re:)	
)	Chapter 11
PETTERS COMPANY, INC.,)	
et al.,)	Case No. 08-45257(GFK)
)	Jointly Administered
Debtors.)	
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FIRST SET OF INTERROGATORIES TO DOUGLAS A. KELLEY

Pursuant to Rule 7033 of the Federal Rules of Bankruptcy Procedure and Federal Rule of Civil Procedure 33, creditors Ritchie Capital Management, Ltd., Ritchie Special Credit Investments, Ltd., Rhone Holdings II., Ltd., Yorkville Investment I, L.L.C., and Ritchie Capital Structure Arbitrage Trading, Ltd. ("Ritchie Creditors") request that Douglas A. Kelley, who has been appointed Trustee for the Debtors in the above-captioned jointly-administered proceedings by the United States Trustee (but has not been approved by the Court) and serves as Receiver for the same ("Kelley"), answer the interrogatories contained herein by January 21, 2009 and transmit the responses to the offices of Sidley Austin LLP, One South Dearborn Street, Chicago, Illinois, 60603, c/o Brooke L. Devlin-Brown. These interrogatories are continuing in nature, and the Ritchie Creditors request that all responses to these interrogatories be supplemented in accordance with Rule 7026 of the Federal Rules of Bankruptcy Procedure and Federal Rule of Civil Procedure 26(e).

DEFINITIONS AND INSTRUCTIONS

In the interrogatories appearing below, the following definitions shall apply:

1. "Relating to" or "related to" includes describing, discussing, reflecting, constituting, evidencing, referring to, concerning, involving, memorializing, dealing with, and bearing on (whether factually, legally, or otherwise).

2. “You” and “your,” refers to Mr. Douglas A. Kelley, who has been appointed Trustee for the debtors in the above-captioned jointly-administered proceedings by the United States Trustee (but has not been approved by the Court) and serves as Receiver for the same pursuant to orders issued in the proceeding captioned *United States v. Petters, et al.*, Civil No. 08-SC-5348 (ADM/JSM) that is presently pending in the United States District Court for the District of Minnesota, and any agent, attorney, representative or other person acting, or purporting to act on his behalf.

3. “Ritchie Creditors” refers to Ritchie Capital Management, Ltd., Ritchie Special Credit Investments, Ltd., Rhone Holdings II., Ltd., Yorkville Investment I, L.L.C., and Ritchie Capital Structure Arbitrage Trading, Ltd.

4. “United States Trustee,” refers to the office of the United States Trustee, located at 1015 U.S. Courthouse, 300 S. 4th Street, Minneapolis, MN, 55415, and all attorneys, employees and agents thereof.

5. “United States Attorney,” refers to the office of the United States Attorney, located at 300 S. 4th Street, Suite 600, Minneapolis, MN, 55415, and all attorneys, employees and agents thereof.

6. “Subsidiaries of Petters Company, Inc.” or “PCI Subsidiaries” means all wholly-owned subsidiaries of Petters Company, Inc., including PC Funding, LLC, Thousand Lakes, LLC, SPF Funding, LLC, PL Ltd., Inc., Edge One LLC, MGC Finance, Inc., PAC Funding, LLC, and Palm Beach Finance Holdings, Inc.

7. “Subsidiaries of Petters Group Worldwide, L.L.C.” or “PGW Subsidiaries” means all wholly-owned subsidiaries of Petters Group Worldwide, L.L.C., including but not limited to Polaroid Corporation and Fingerhut.

8. "Petters" means Thomas J. Petters of Wayzata, Minnesota.
9. "Houlihan" means investment banking services firm Houlihan Lokey.
10. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise), in oral, written, electronic or any other form, and is not limited to transfers between persons, but includes other transfers, such as records and memoranda to file.
11. "Concerning" means referring to, relating to, reflecting or being in any way logically connected with the matter described.
12. "Person" means any natural person or any business, legal or governmental agency or association of whatever kind, nature or description.
13. "Including" means including, but not limited to.
14. As used herein, "identify" when used in relation to a natural person, calls for the name, present and last known business and residential addresses, email addresses, telephone number, occupation, and employer of such person; when used in relation to a corporation, partnership, joint venture, subsidiary, affiliate or other business organization or entity, such terms call for the name and address of such corporation, partnership, joint venture, subsidiary, affiliate, or other business organization or entity.
15. The past tense shall be construed to include the present tense, and vice versa, to make the discovery request inclusive rather than exclusive.
16. The singular shall be construed to include the plural, and vice versa, to make the discovery request inclusive rather than exclusive.
17. The words "and" and "or" shall be construed conjunctively or disjunctively as is necessary to make the discovery request inclusive rather than exclusive.

18. "Any" is understood to include and encompass "all." The word "all" also includes "each" and vice versa.

19. If you object to an interrogatory and withhold any information pursuant to a claim of privilege, work product, or other discovery protection, you shall make that claim expressly and shall state your grounds for objection, as required by Rule 7033 of the Federal Rules of Bankruptcy Procedure and Rule 33(b)(4) of the Federal Rules of Civil Procedure. To the extent that you withhold any information pursuant to a claim of privilege, work product, or other discovery protection, you shall provide a description of each item of withheld information which contains the following:

- (i) A brief description of the subject matter or nature of the information sufficient to assess whether the assertion of privilege is valid;
- (ii) The name and title of the person(s) who possessed or communicated the information, or of the person who knows about the information referred to therein;
- (iii) The date of the communication of information;
- (iv) The specific basis upon which the privilege is claimed; and,
- (v) To the extent that any claim of privilege relates to an attorney, or advice or work product of an attorney, the identity of the attorney involved.

20. In answering these Interrogatories, furnish all information available to you or subject to your reasonable inquiry, including but not limited to, information in the possession of your attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, and anyone else otherwise subject to your control.

21. If an interrogatory cannot be answered in full, answer to the extent possibly, specify the reason for your inability to answer the remainder, and state whatever information or knowledge you have regarding the unanswered portion.

22. In answering these Interrogatories, please restate each Interrogatory in full before stating your response thereto.

23. All terms used herein shall be construed in an ordinary, common sense manner, and not in a hypertechnical, strained, overly-literal, or otherwise restrictive manner.

INTERROGATORIES

INTERROGATORY 1: State any and all actions you have taken as Receiver for Petters Group Worldwide, LLC. (hereinafter "PGW") and the PGW Subsidiaries.

INTERROGATORY 2: State any and all actions you have taken as Receiver for Petters Company, Inc. (hereinafter "PCI") and the PCI Subsidiaries.

INTERROGATORY 3: Identify the date and persons participating in, and describe the substance of, all of your communications with the United States Attorney with respect to Petters, PGW, the PGW Subsidiaries, PCI or the PCI Subsidiaries.

INTERROGATORY 4: Identify the date and persons participating in, and describe the substance of, all of your communications with each of the following: creditors of PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries; the United States Trustee; Houlihan; and any representatives or agents of Polaroid Corporation.

INTERROGATORY 5: Identify and describe any analysis of actual or potential claims or actions by or against PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, including but not limited to any such claims or actions by one Petters-related entity against another and any such claims or actions involving the Ritchie Creditors, the United States government, and the victims of the fraud allegedly perpetrated by Petters and his accomplices.

INTERROGATORY 6: Identify and describe what you have done to investigate, and your future plans for investigation of, the fraud allegedly perpetrated by Petters and his accomplices in your capacity as Receiver for PGW and the PGW Subsidiaries.

INTERROGATORY 7: Identify and describe what you have done to recover, and your future plans for recovery of, monies or other assets on behalf of the victims of the fraud allegedly perpetrated by Petters and his accomplices in your capacity as Receiver for PGW and the PGW Subsidiaries.

INTERROGATORY 8: Identify and describe what you have done to investigate, and your future plans for investigation of, the fraud allegedly perpetrated by Petters and his accomplices in your capacity as Receiver for PCI and the PCI Subsidiaries.

INTERROGATORY 9: Identify and describe what you have done to recover, and your future plans for recovery of, monies or other assets on behalf of the victims of the fraud allegedly perpetrated by Petters and his accomplices in your capacity as Receiver for PCI and the PCI Subsidiaries.

INTERROGATORY 10: Identify the date and persons participating in, and describe the substance of, all of your communications with executives or other representatives of PCI, the PCI Subsidiaries, PGW and the PGW Subsidiaries, including but not limited to representatives of Polaroid Corporation.

INTERROGATORY 11: Identify and describe any analysis or consideration of a forfeiture claim or potential forfeiture claim brought by the United States government against PGW or the PGW Subsidiaries.

INTERROGATORY 12: Identify, describe and state the conclusions of all analyses or considerations of the issue of whether PGW and the PGW Subsidiaries should not be considered

distinct from PCI and the PCI Subsidiaries, including all analyses or considerations of theories of “veil-piercing,” “single business enterprise,” “alter ego,” or any other legal theory that would result in a disregard of any aspect of the distinct legal status of any of PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, and including any communications with the United States Attorney regarding the same.

INTERROGATORY 13: Identify your compensation as Receiver for PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, including but not limited to the hourly rate you have charged or will charge for your services, the source or likely source of the payment of your compensation and the total amount of compensation you have received as Receiver for each of PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries.

INTERROGATORY 14: State the amount of time you have spent and do spend as Receiver for each of PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, including but not limited to the percentage of your total time spent performing professional services, including but not limited to your practice of law at Kelley & Wolter, P.A., that is spent performing duties as Receiver for PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries.

INTERROGATORY 15: Identify the date and describe the substance of all your communications with Petters.

INTERROGATORY 16: Identify and describe all work done by you or your law firm, Kelley & Wolter, P.A., for Petters, PGW, the PGW Subsidiaries, PCI or the PCI Subsidiaries prior to the arrest of Petters.

INTERROGATORY 17: In your Verified Statement, you stated that the United States Attorney’s office contacted you one day after had discussed with Petters and others the possibility of represented PGW and PCI, and stated that the United States Attorney’s office had learned that

you were considering representing those entities. State whether you know how the United States Attorney's office learned about the possibility that you would represent PGW or PCI, and if you do have such knowledge, explain it.

INTERROGATORY 18: Identify and explain the events and considerations following your contact with the United States Attorney's office set forth in Interrogatory No. 17 that led to your appointment as Receiver for PGW and PCI.

INTERROGATORY 19: Identify and explain any analysis of PGW's role in the fraud perpetrated by Petters that is the subject of the Indictment of PGW dated December 1, 2008.

INTERROGATORY 20: Identify and describe all discussions with the United States Attorney's office or the United States Trustee's office concerning the Ritchie Creditors.

LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.

/e/ James M. Jorissen

Dated: January 9, 2009

By _____
James M. Jorissen, #262833
100 South Fifth Street, Suite 2500
Minneapolis, Minnesota 55402-1234
(612) 332-1030

Bryan Krakauer
Thomas K. Cauley, Jr.
Brian A. McAleenan
SIDLEY AUSTIN LLP
One South Dearborn
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COUNSEL FOR RITCHIE CAPITAL
MANAGEMENT, LTD., RITCHIE SPECIAL
CREDIT INVESTMENTS, LTD., RHONE
HOLDINGS II, LTD., YORKVILLE
INVESTMENT I, LLC, AND RITCHIE
CAPITAL STRUCTURE ARBITRAGE
TRADING, LTD.

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re:)	
)	Chapter 11
PETTERS COMPANY, INC.,)	
et al.,)	Case No. 08-45257(GFK)
)	Jointly Administered
Debtors.)	
_____)	

FIRST SET OF DOCUMENT REQUESTS TO DOUGLAS A. KELLEY

Pursuant to Rule 7034 of the Federal Rules of Bankruptcy Procedure and Federal Rule of Civil Procedure 34, creditors Ritchie Capital Management, Ltd., Ritchie Special Credit Investments, Ltd., Rhone Holdings II., Ltd., Yorkville Investment I, L.L.C., and Ritchie Capital Structure Arbitrage Trading, Ltd. ("Ritchie Creditors") request that Douglas A. Kelley, who has been appointed Trustee for the Debtors in the above-captioned jointly-administered proceedings by the United States Trustee (but has not been approved by the Court) and who serves as Receiver for the same ("Kelley"), produce the documents described herein for inspection and copying by January 21, 2009 at the offices of Sidley Austin LLP, One South Dearborn Street, Chicago, Illinois, 60603, c/o Brooke L. Devlin-Brown. These document requests are continuing in nature, and the Ritchie Creditors request that all responses to this document request be supplemented in accordance with Rule 7026 of the Federal Rules of Bankruptcy Procedure and Federal Rule of Civil Procedure 26(e).

DEFINITIONS AND INSTRUCTIONS

In the document requests appearing below, the following definitions shall apply:

1. "Relating to" or "related to" includes describing, discussing, reflecting, constituting, evidencing, referring to, concerning, involving, memorializing, dealing with, and bearing on (whether factually, legally, or otherwise).

2. “You” and “your” refers to Mr. Douglas A. Kelley, who has been appointed Trustee for the Debtors in the above-captioned jointly-administered proceedings by the United States Trustee (but has not been approved by the Court) and serves as Receiver for the same pursuant to orders issued in the proceeding captioned *United States v. Petters, et al.*, Civil No. 08-SC-5348 (ADM/JSM) that is presently pending in the United States District Court for the District of Minnesota, and any agent, attorney, representative or other person acting, or purporting to act on his behalf.

3. “Ritchie Creditors” refers to Ritchie Capital Management, Ltd., Ritchie Special Credit Investments, Ltd., Rhone Holdings II., Ltd., Yorkville Investment I, L.L.C., and Ritchie Capital Structure Arbitrage Trading, Ltd.

4. “United States Trustee,” refers to the office of the United States Trustee, located at 1015 U.S. Courthouse, 300 S. 4th Street, Minneapolis, MN, 55415, and all attorneys, employees and agents thereof.

5. “United States Attorney,” refers to the office of the United States Attorney, located at 300 S. 4th Street, Suite 600, Minneapolis, MN, 55415, and all attorneys, employees and agents thereof.

6. “Subsidiaries of Petters Company, Inc.” or “PCI Subsidiaries” means all wholly-owned subsidiaries of Petters Company, Inc., including PC Funding, LLC, Thousand Lakes, LLC, SPF Funding, LLC, PL Ltd., Inc., Edge One LLC, MGC Finance, Inc., PAC Funding, LLC, and Palm Beach Finance Holdings, Inc.

7. “Subsidiaries of Petters Group Worldwide, L.L.C.” or “PGW Subsidiaries” means all wholly-owned subsidiaries of Petters Group Worldwide, L.L.C., including but not limited to Polaroid Corporation and Fingerhut.

8. "Petters" means Thomas J. Petters of Wayzata, Minnesota.
9. "Houlihan" means investment banking services firm Houlihan Lokey.
10. "Communication" means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise), in oral, written, electronic or any other form, and is not limited to transfers between persons, but includes other transfers, such as records and memoranda to file.
11. "Concerning" means referring to, relating to, reflecting or being in any way logically connected with the matter described.
12. "Person" means any natural person or any business, legal or governmental agency or association of whatever kind, nature or description.
13. "Document" is to be interpreted in the broadest sense and includes, but is not limited to, all writings of every kind including, but not limited to, letters; telegrams; memoranda; reports; studies; photographs; calendar and diary entries; pamphlets; notes; charts; drawings; graphs; tabulations; analyses; statistical or informational accumulations; advertisements; portfolios; any type of record of any meeting or conversation (including tape recordings); film impressions; videotapes; moving pictures; magnet tapes; electronic documents of any kind; data and writings stored in a computer, on a computer diskette, USB drive, Zip drive, internet database, or elsewhere; data compilations; sound or mechanical reproductions, or recordings; and copies of documents that are not identical duplicates of the originals (e.g., because handwritten or "blind" notes appear thereon or are attached thereto), whether or not the originals are in the Receiver's possession, custody, or control.
14. "Including" means including, but not limited to.
15. The past tense shall be construed to include the present tense, and vice versa, to make the discovery request inclusive rather than exclusive.

16. The singular shall be construed to include the plural, and vice versa, to make the discovery request inclusive rather than exclusive.

17. The words “and” and “or” shall be construed conjunctively or disjunctively as is necessary to make the discovery request inclusive rather than exclusive.

18. “Any” is understood to include and encompass “all.” The word “all” also includes “each” and vice versa.

19. If you object to a document request and withhold any information pursuant to a claim of privilege, work product, or other discovery protection, you shall make that claim expressly and shall state your grounds for objection, as required by Rule 7034 of the Federal Rules of Bankruptcy Procedure and Rule 34(b)(2) of the Federal Rules of Civil Procedure. To the extent that you withhold any information pursuant to a claim of privilege, work product, or other discovery protection, you shall provide a log of the withheld documents containing the following information:

(i) A brief description of the subject matter or nature of the document sufficient to assess whether the assertion of privilege is valid;

(ii) The name and title of the person who sent, authored, prepared, signed, or originated the document, or of the person who knows about the information contained therein;

(iii) The document date;

(iv) The name and title of the recipient(s) of the document, if any;

(v) The specific basis upon which the privilege is claimed; and,

(vi) To the extent that any claim of privilege relates to an attorney, or advice or work product of an attorney, the identity of the attorney involved.

20. In answering these Document Requests, furnish all documents available to you or to your reasonable inquiry, including but not limited to, documents in the possession of your

attorneys, accountants, advisors, or other persons directly or indirectly employed by, or connected with, you or your attorneys, and anyone else otherwise subject to your control.

21. All terms used herein shall be construed in an ordinary, common sense manner, and not in a hypertechnical, strained, overly-literal, or otherwise restrictive manner.

22. All documents should be organized either (a) chronologically, (b) as they are kept in the normal course of business, or (c) labeled to correspond with the requests in this document request. Responsive documents that exist in electronic format should be produced in their native electronic format, with the original file folder structure and metadata preserved.

DOCUMENT REQUESTS

REQUEST 1: All documents concerning any and all actions you have taken as Receiver for Petters Group Worldwide, LLC (hereinafter “PGW”) and the PGW Subsidiaries.

REQUEST 2: All documents concerning all of your communications with the United States Attorney with respect to Petters, PGW, Petters Company, Inc. (hereinafter, “PCI”) or any entity or person related thereto, both prior to and after your appointment as Receiver for PGW and PCI.

REQUEST 3: All documents concerning any analysis of claims or other actions or potential claims or other actions against PGW or the PGW Subsidiaries or their assets, including but not limited to claims of the Ritchie Creditors and claims or other actions or potential claims or other actions against PGW or the PGW Subsidiaries by victims of the fraud allegedly perpetrated by Petters and his accomplices.

REQUEST 4: All documents concerning any analysis of claims or other actions or potential claims or other actions by PGW or the PGW Subsidiaries against other parties,

including but not limited to claims or other actions or potential claims or other actions against PCI or any PCI Subsidiaries.

REQUEST 5: All documents concerning your investigation, as Receiver for PGW and the PGW Subsidiaries, of the fraud allegedly perpetrated by Petters and his accomplices.

REQUEST 6: All documents concerning any analysis or consideration of the issue of whether PGW and the PGW Subsidiaries should not be considered distinct from PCI and the PCI Subsidiaries, including any analysis or consideration of theories of “veil-piercing,” “single business enterprise,” “alter ego,” or any other legal theory that would result in a disregard of any aspect of the distinct legal status of any of PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, and including any communications with the United States Attorney regarding the same.

REQUEST 7: All documents concerning any analysis or consideration of any forfeiture, criminal restitution or other action by the United States government against PGW or the PGW Subsidiaries, including any communications with the United States Attorney regarding the same.

REQUEST 8: All documents concerning any and all actions you have taken as Receiver for PCI and the PCI Subsidiaries.

REQUEST 9: All documents concerning any analysis of claims or other actions or potential claims or other actions against PCI and the PCI subsidiaries, including but not limited to claims of the Ritchie Creditors and claims or other actions or potential claims or other actions by victims of the fraud allegedly perpetrated by Petters and his accomplices.

REQUEST 10: All documents concerning any analysis of claims or other actions or potential claims or other actions by PCI or the PCI Subsidiaries against other parties,

including but not limited to claims or other actions or potential claims or other actions against PGW or the PGW Subsidiaries.

REQUEST 11: All documents concerning your investigation, as Receiver for PCI and the PCI Subsidiaries, of the fraud allegedly perpetrated by Petters and his accomplices.

REQUEST 12: All documents that concern any communication with executives or other representatives of PGW, the PGW Subsidiaries, PCI or the PCI Subsidiaries, both prior and subsequent to your appointment as Receiver for those entities.

REQUEST 13: All documents concerning any communications with each of the following: creditors of PGW, the PGW Subsidiaries, PCI or the PCI Subsidiaries; the United States Trustee; Houlihan; any PCI, the PCI Subsidiaries, PGW and the PGW Subsidiaries, including but not limited to Polaroid Corporation.

REQUEST 14: All documents concerning any analysis or consideration of a forfeiture action or potential forfeiture action brought against PGW, the PGW Subsidiaries, PCI or any PCI Subsidiaries by the United States government, including but not limited any communications with the United States Attorney or any other representative of the United States government.

REQUEST 15: All documents concerning any analysis or investigation into transfers of money or any other assets between or among any of the following: Petters, PCI, any of the PCI Subsidiaries, PGW and/or the PGW Subsidiaries.

REQUEST 16: All documents concerning your compensation as Receiver for PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries, including but not limited to: (i) the basis for determining the amount of compensation requested; (ii) the number of payments you have received; (iii) the source of payment for your compensation; and (iv) the total amount of

compensation received as Receiver for PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries.

REQUEST 17: All documents concerning the amount of time you have spent and do spend as Receiver for PGW, the PGW Subsidiaries, PCI and the PCI Subsidiaries.

REQUEST 18: All documents concerning communications with Petters both prior to and subsequent to your appointment as Receiver for PGW and PCI.

REQUEST 19: All documents concerning your relationship with Petters prior and subsequent to your appointment as Receiver for PGW and PCI.

LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.

/e/ James M. Jorissen

Dated: January 9, 2009

By _____
James M. Jorissen, #262833
100 South Fifth Street, Suite 2500
Minneapolis, Minnesota 55402-1234
(612) 332-1030

Bryan Krakauer
Thomas K. Cauley, Jr.
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COUNSEL FOR RITCHIE CAPITAL
MANAGEMENT, LTD., RITCHIE SPECIAL
CREDIT INVESTMENTS, LTD., RHONE
HOLDINGS II, LTD., YORKVILLE
INVESTMENT I, LLC, AND RITCHIE
CAPITAL STRUCTURE ARBITRAGE
TRADING, LTD.

393801

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF MINNESOTA**

In re:)	
)	Chapter 11
PETTERS COMPANY, INC.,)	
et al.,)	Case No. 08-45257(GFK)
)	Jointly Administered
Debtors.)	
_____)	

NOTICE OF DEPOSITION TO DOUGLAS A. KELLEY

PLEASE TAKE NOTICE THAT, pursuant to Rule 7030 of the Federal Rules of Bankruptcy Procedure and Rule 30 of the Federal Rules of Civil Procedure, creditors Ritchie Capital Management, Ltd., Ritchie Special Credit Investments, Ltd., Rhone Holdings II., Ltd., Yorkville Investment I, L.L.C., and Ritchie Capital Structure Arbitrage Trading, Ltd. ("Ritchie Creditors") will take the deposition upon oral examination of Douglas A. Kelley, whom the United States Trustee has appointed Trustee for all debtors in the above-captioned proceeding. The deposition shall take place on January 23, 2009, beginning at 9:00 a.m. and continuing from day to day thereafter (excluding Saturdays, Sundays and holidays) until completed. The deposition shall take place at the offices of Leonard, O'Brien, Spencer, Gayle & Sayre, Ltd., 100 South Fifth Street, Suite 2500, Minneapolis, Minnesota 55402, or according to alternative arrangements upon which counsel jointly agree. The deposition shall be taken before an officer authorized to administer oaths and may be recorded by any means that the Federal Rules of Civil Procedure permit, including videotaping, audio taping, stenographic recording, and means permitting electronic transmission of the transcript.

LEONARD, O'BRIEN
SPENCER, GALE & SAYRE, LTD.

/e/ James M. Jorissen

Dated: January 9, 2009

By _____
James M. Jorissen, #262833
100 South Fifth Street, Suite 2500
Minneapolis, Minnesota 55402-1234
(612) 332-1030

Bryan Krakauer
Thomas K. Cauley, Jr.
Brian A. McAleenan
SIDLEY AUSTIN LLP
One South Dearborn
Chicago, Illinois 60603
(312) 853-7000

COUNSEL FOR RITCHIE CAPITAL
MANAGEMENT, LTD., RITCHIE SPECIAL
CREDIT INVESTMENTS, LTD., RHONE
HOLDINGS II, LTD., YORKVILLE
INVESTMENT I, LLC, AND RITCHIE
CAPITAL STRUCTURE ARBITRAGE
TRADING, LTD.

393805

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MINNESOTA

In re:

Jointly Administered under
Case No. 08-45257

Petters Company, Inc., et al.,

Debtors.

Court File No. 08-45257

Court File Nos.:

(includes:

Petters Group Worldwide, LLC;

08-45258 (GFK)

PC Funding, LLC;

08-45326 (GFK)

Thousand Lakes, LLC;

08-45327 (GFK)

SPF Funding, LLC;

08-45328 (GFK)

PL Ltd., Inc.;

08-45329 (GFK)

Edge One LLC;

08-45330 (GFK)

MGC Finance, Inc.;

08-45331 (GFK)

PAC Funding, LLC;

08-45371 (GFK)

Palm Beach Finance Holdings, Inc.)

08-45392 (GFK)

Chapter 11 Cases

Judge Gregory F. Kishel

UNSWORN CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2009, I caused the following documents:

First Set of Interrogatories to Douglas A. Kelley and First Set of Document Requests to Douglas A. Kelley

to be filed electronically with the Clerk of Court through ECF, and that ECF will send an e-notice of the electronic filing to the following:

N/A

I further certify that I caused a copy of the foregoing documents to be emailed on January 9, 2009 and mailed on January 12, 2009 by first class mail, postage paid, to the following parties:

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Dated: January 9, 2009

/e/ Valerie Rittenbach

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