

JOSH STEIN
ATTORNEY GENERAL



State of North Carolina
Department of Justice

INVESTIGATIVE DEMAND

Served Upon: Puff Bar, Inc.
C/O Nick Minas Alfaro, Service Agent
777 S. Alameda St., Floor 2
Los Angeles, CA 90021

Nick Minas Alfaro, CEO
Puff Bar, Inc.
101 N. Verdugo Rd., #11001
Glendale, CA 91606

Patrick Beltran, Secretary
Puff Bar, Inc.
101 N. Verdugo Rd., #11011
Glendale, CA 91606

TAKE NOTICE: YOU ARE HEREBY COMMANDED to produce, on or before December 3, 2021, to the undersigned at the address below, the documents identified herein.

PLEASE NOTE FURTHER that this Investigative Demand is ongoing in nature and that you should supplement your responses by delivering to the undersigned copies of responsive documents as those documents come into your possession, custody, or control, or as soon thereafter as practicable.

I. DEFINITIONS

1. **ALL** shall be construed to include the collective as well as the singular and shall mean “each,” “any,” and “every.”
2. **AND** and **OR** are terms of inclusion and not of exclusion and shall be construed either disjunctively or conjunctively, as necessary, to bring within the scope of this Investigative Demand any document that might otherwise be construed to be outside of its scope.
3. **COMMUNICATIONS** mean and refer to any expression or exchange of information, either sending or receiving, by any means of transmissions, including but not limited to speech, writing, conduct, including in-person or telephone conversations, voice mails, letters, memoranda, facsimiles, e-mail, instant messages, text messages, postings or messages on “social networking” sites (including but not limited to Instagram, Snapchat, Facebook, YouTube, Google+, and Twitter), shared applications from cell phones, or by any other means. **COMMUNICATIONS** shall also include, without limitation, **ALL** originals and copies of inquiries, discussion, conversation, correspondence, negotiations, agreement, understandings, meetings, notices, requests, responses, demands, complaints, press, publicity, or trade releases and the like that are provided by **YOU** or to **YOU** by others.
4. **CONCERNING** means referring to, describing, offering evidence of, relating to, comprising, regarding, showing, or constituting.
5. **CORRESPONDENCE** includes all letters, emails, telephone calls, voice mails, instant messages, social media postings or messaging, electronic message board posts, notices, advertisements, and other written communications, computerized communications or memoranda, and any records of conversations, meetings, conferences, or other oral communications.
6. **DOCUMENTS** means the original (or duplicate, identical copies when originals are not available), and any non-identical copies (whether different from the original because of notes made on such copies or otherwise) of writings or recordings of every kind and description whether written, mechanical, electronic or any other means, as well as phonic or visual reproductions of oral statements or conversations, and including, but not limited to, any manual, book, pamphlet, periodical, letter, group or individual e-mail, instant message, social media posting or messaging, electronic message board post, report, memorandum, notation, message, facsimile, record, study, working paper, accounting paper, telephone log, chart, graph, index, tape, minutes, computer printout, contract, lease, invoice, record of purchase or sale, correspondence, electronic or other transcription of taping of telephone or personal conversations or conferences, or any and all other written, printed, typed, taped, filmed or graphic matter however produced or reproduced and any electronic, mechanical, computer, e-mail, or Internet records or representations of any kind (including, without limitation, tapes, cassettes, discs, recordings, and computer and electronic memories). **DOCUMENTS** includes the file, folder tabs or containers and

labels associated with each original or copy. DOCUMENTS shall also include any COMMUNICATIONS.

7. **IDENTITY** means an individual's full name, present or last known residential and business addresses, and present or last known telephone numbers.
8. **NORTH CAROLINA ADDRESS** means the postal address of any residential or commercial location or Post Office Box located in the State of North Carolina.
9. **PERSON** means any natural person, individual, any business entity (whether partnership, corporation, limited liability company or corporation, trust estate, incorporated or unincorporated association or cooperation), any governmental agency or entity and any other legal or commercial entity, however organized.
10. **PRODUCT** means any product, good, or service that PUFF BAR provides or has ever provided.
11. **PUFF BAR** or **YOU** or **YOUR** mean and include PUFF BAR, Inc., a California corporation with its principal place of business located in Glendale, CA, as well as any parent, affiliate, subsidiary or business segment, predecessor, successor or assignee of it, and its principals, operating divisions, present or former owners, employees, servants officers, directors, agents, representatives, attorneys, accountants, distributors, and any other person acting on behalf of or under the direction, authorization or control of PUFF BAR, including through any trade names or fictitious names.
12. **PUFF BAR WEBSITE** means any Website owned, maintained and/or operated by PUFF BAR, including but not limited to www.puffbar.com, that sells, advertises, markets, or promotes VAPOR PRODUCTS.
13. **RELATED TO** means in whole or in part constituting, concerning, evidencing, containing, discussing, commenting upon, describing, analyzing, identifying, stating, pertaining to, referring to, forming the basis of, in preparation of, or contradicting.
14. **VAPOR PRODUCT** means any nonlighted, noncombustible product that employs a mechanical heating element, battery, or electronic circuit regardless of shape or size and that can be used to produce vapor from nicotine in a solution. The term includes devices, such as an electronic cigarette, electronic cigar, electronic cigarillo, or electronic pipe, as well as any nicotine product, including but not limited to a cartridge, pod, tank, e-juice, vape juice, or salt nicotine product, designed to be used with those devices. The term includes products made with either synthetic nicotine or nicotine derived from tobacco leaves.

References to the singular or plural form of any word shall be construed as inclusive of either form, as necessary, to bring within the scope of this Investigative Demand any document or information that might otherwise be construed to be outside of its scope.

II. INSTRUCTIONS

1. **Relevant Time Period:** Unless otherwise noted, the relevant time period for which documents are demanded is from January 1, 2019 to the present. In each instance in which a document is produced in response to a demand, the current edition should be produced together with all earlier editions, or predecessor documents during the relevant time period, even though the title of earlier documents may differ from current versions.
2. **Authorship and Intended Audience Irrelevant:** This Investigative Demand seeks production of all described documents in your possession, custody or control without regard to the person or persons by whom or for whom the documents were prepared (e.g., your employees, distributors, representatives, competitors, or others).
3. **Documents No Longer in Possession of Respondent/Destroyed Documents:** If any responsive document was, but no longer is, in your possession, custody or control, produce a description of each such document. The description shall include the following:
 - a. the name of each author, sender, creator, and initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date the document was created;
 - d. the date(s) the document was in use;
 - e. a detailed description of the content of the document;
 - f. the reason it is no longer in your possession, custody or control; and
 - g. the document's current location.

If the document is no longer in existence, in addition to providing the information indicated above, state on whose instructions the document was destroyed or otherwise disposed of, and the date and manner of the disposal.

4. **Format of Responses:** Responses must be provided in an electronic format and produced in the manner specified in the "Protocol for Document Production" attached hereto as Appendix A.
5. **Privileged Documents:** If any responsive document is withheld under any claim of privilege, provide a detailed privilege log that contains at least the following information for each document that you have withheld:
 - a. the name of each author, writer, sender, creator, or initiator of such document;
 - b. the name of each recipient, addressee, or party for whom such document was intended;
 - c. the date of such document, or an estimate thereof if no date appears on the document;

- d. the general subject matter of the document; and
 - e. the claimed grounds for withholding the document, including – but not limited to – the nature of any claimed privilege and grounds in support thereof.
6. **Duty to Supplement:** All document demands are continuing in nature so as to require the supplementary production if you obtain further responsive documents or information. You are also required to amend your responses to the demands contained within if you discover that the previous response was incorrect or incomplete.
7. **Duty to Preserve Documents:** All documents and/or other data which relate to the subject matter of these demands must be preserved. Any destruction involving such documents must cease, even if it is your normal or routine course of business to delete or destroy such documents or data and even if you believe such documents or data are privileged or otherwise need not be produced. Electronically-stored information is an irreplaceable source of evidence in this matter. Accordingly, you must also implement appropriate safeguard against the destruction of electronically stored information that relate to the subject matter of these demands until the final resolution of this issue.

III. DOCUMENTS DEMANDED

1. DOCUMENTS sufficient to show ALL PERSONS who previously had or presently have an ownership stake in PUFF BAR and the percentage stake each PERSON had or has.
2. DOCUMENTS sufficient to IDENTIFY ALL officers, managers, directors, and employees of PUFF BAR.
3. DOCUMENTS sufficient to show all trademarks, patents, or copyrights concerning, referencing, or relating to PUFF BAR that have been applied for or owned by PUFF BAR or any of its officers, managers, directors, employees, and/or agents.
4. DOCUMENTS sufficient to show ALL names under which PUFF BAR has operated or does operate.
5. DOCUMENTS sufficient to show ALL of YOUR related entities (for instance—parent, affiliate, subsidiary or business segment, predecessor, successor or assignee).
6. ALL corporate DOCUMENTS YOU have filed with state or local government agencies or entities in California.
7. ALL DOCUMENTS YOU have filed with the North Carolina Secretary of State.
8. ALL DOCUMENTS CONCERNING any advertisements, promotional materials, and/or marketing campaigns for PUFF BAR in North Carolina during the Relevant Time Period, including but not limited to ALL print advertisements and/or marketing conducted online.
9. ALL DOCUMENTS CONCERNING the use or suspected use of PUFF BAR PRODUCTS by those under the legal age to purchase such products.
10. ALL DOCUMENTS CONCERNING YOUR knowledge of the appeal of PUFF BAR PRODUCTS to those under the legal age to purchase such products.
11. DOCUMENTS sufficient to show ALL VAPOR PRODUCTS that YOU have manufactured during the Relevant Time Period, including but not limited to DOCUMENTS showing ALL flavors and nicotine strengths of these PRODUCTS.
12. DOCUMENTS sufficient to show ALL VAPOR PRODUCTS that YOU have purchased from manufacturers, wholesalers, or distributors during the Relevant Time Period, including but not limited to DOCUMENTS showing ALL flavors and nicotine strengths of these PRODUCTS.
13. DOCUMENTS sufficient to show ALL VAPOR PRODUCTS that YOU offer or have offered for sale during the Relevant Time Period, including but not limited to DOCUMENTS showing ALL flavors and nicotine strengths of these PRODUCTS.

14. DOCUMENTS sufficient to show the PRODUCT packaging for ALL VAPOR PRODUCTS that YOU have manufactured, purchased, or sold during the Relevant Time Period, including but not limited to PRODUCT packaging for ALL flavors and nicotine strengths of the PRODUCT and the dates during which each version of the PRODUCT packaging was used.
15. DOCUMENTS sufficient to show whether the nicotine in YOUR PRODUCTS is derived from tobacco leaves or synthetically, including whether that changed over time and the manner in which that change occurred (including who was involved in the decision to make any such change).
16. DOCUMENTS sufficient to show YOUR top five best-selling PUFF BAR PRODUCTS sold directly to consumers in North Carolina during the entire Relevant Time Period AND in the past 90 days, including DOCUMENTS sufficient to show the PRODUCTS purchased, including the quantity, price paid, nicotine amount, and flavor of each PRODUCT. In the alternative, you may provide a list, table, or chart that contains ALL of the information sought by this demand.
17. DOCUMENTS sufficient to show YOUR top five best-selling PUFF BAR PRODUCTS sold to YOUR past and current business partners, vendors, suppliers, wholesalers, distributors, resellers, retailers, customers, or affiliates located in North Carolina or who YOU have reason to believe sold or sells PUFF BAR PRODUCTS in North Carolina during the entire Relevant Time Period AND in the past 90 days, including DOCUMENTS sufficient to show the IDENTITY of the purchaser and the PRODUCTS purchased, including the quantity, price paid, nicotine amount, and flavor of each PRODUCT. In the alternative, you may provide a list, table, or chart that contains ALL of the information sought by this demand.
18. DOCUMENTS sufficient to show ALL of YOUR past and current business partners, vendors, suppliers, wholesalers, distributors, resellers, retailers, customers, or affiliates located in North Carolina.
19. DOCUMENTS sufficient to show ALL of YOUR past and current business partners, vendors, suppliers, wholesalers, resellers, retailers, customers, affiliates, or any other PERSON who YOU have reason to believe sold or sells PUFF BAR PRODUCTS in North Carolina, or who YOU have reason to believe shipped or ships PUFF BAR PRODUCTS into North Carolina, including DOCUMENTS sufficient to show:
 - a. The IDENTITY of such PERSON;
 - b. The amount paid by the purchaser, itemized by PRODUCT price, taxes, shipping cost and any other applicable category;
 - c. The PRODUCTS purchased, including the nicotine amount and flavor;
 - d. The NORTH CAROLINA ADDRESS to which the product was delivered;
 - e. The method by which the PRODUCTS were delivered; and
 - f. The date on which the PRODUCTS were delivered;

20. For every transaction in which a consumer purchased any VAPOR PRODUCT offered for sale on the PUFF BAR WEBSITE for delivery to a NORTH CAROLINA ADDRESS during the relevant time period, DOCUMENTS sufficient to demonstrate:
- a. The date of the transaction;
 - b. The IDENTITY of the purchaser, including name, age and date of birth;
 - c. The PRODUCT purchased, including the nicotine amount and flavor;
 - d. The amount paid by the purchaser, itemized by PRODUCT price, taxes, shipping cost and any other applicable category;
 - e. The NORTH CAROLINA ADDRESS to which the product was delivered;
 - f. Any action taken by YOU or on YOUR behalf to verify the age of the purchaser;
 - g. The method by which the PRODUCT was delivered;
 - h. The date on which the PRODUCT was delivered; and
 - i. Any restriction placed on the delivery of the PRODUCT, including, but not limited to, any requirement that a person of a certain minimum age receive delivery and/or sign for the delivery.
21. ALL DOCUMENTS CONCERNING: (1) any policy, procedures, or protocols PUFF BAR has developed and implemented to verify a purchaser's age when a VAPOR PRODUCT purchase is made on the PUFF BAR WEBSITE, including effective dates of such policy, procedure, or protocol; and (2) ALL third-party vendors YOU have contracted with or used to perform age verification services on the PUFF BAR WEBSITE.
22. ALL COMMUNICATIONS, CORRESPONDENCE, or other DOCUMENTS CONCERNING complaints made by North Carolina consumers about PUFF BAR or VAPOR PRODUCTS, , including but not limited to complaints related to the appeal or sale of such PRODUCTS to those under the legal age to purchase such products.
23. A copy of ALL licenses YOU have with the North Carolina Department of Revenue.
24. ALL DOCUMENTS and COMMUNICATIONS reflecting YOUR efforts to comply with N.C. Gen. Stat. § 105-113.4F or 15 U.S.C. § 376 RELATED TO deliver sales YOU have made into North Carolina, including but not limited to ALL DOCUMENTS YOU have submitted to the North Carolina Department of Revenue RELATED TO YOUR reporting obligations under N.C. Gen. Stat. § 105-113.4F or 15 U.S.C. § 376.
25. ALL DOCUMENTS YOU have submitted to the North Carolina Department of Revenue RELATED TO YOUR reporting obligations under N.C. Gen. Stat. § 105-113.37(a).
26. ALL DOCUMENTS and COMMUNICATIONS with any of YOUR North Carolina business partners, vendors, suppliers, wholesalers, resellers, retailers, customers, or affiliates RELATED TO YOUR or their compliance with N.C. Gen. Stat. § 105-113.4F or 15 U.S.C. § 376.

27. ALL DOCUMENTS YOU have received from YOUR North Carolina business partners, vendors, suppliers, resellers, or affiliates showing information or documentation that they have submitted to the North Carolina Department of Revenue.

Issued November 16, 2021 under my hand and seal pursuant to the authority vested in me by Sections 75-9 and 75-10 of the General Statutes of North Carolina.

JOSHUA H. STEIN
Attorney General



By: Daniel T. Wilkes
Assistant Attorney General

Brian D. Rabinovitz
Special Deputy Attorney General

Jessica V. Sutton
Special Deputy Attorney General

Consumer Protection Division
North Carolina Dept. of Justice
114 W. Edenton Street
P.O. Box 629
Raleigh, North Carolina 27602
Telephone: (919) 716-6000
Facsimile: (919) 716-6050
Email: dwilkes@ncdoj.gov
brabinovitz@ncdoj.gov
jsutton2@ncdoj.gov

APPENDIX A: Protocol for Document Production

Documents shall be produced according to the following formats:

a. Electronic Production of Paper Documents.

Documents that are maintained in paper format shall be scanned as black and white images at 300 x 300 d.p.i. or greater resolution, in single-page Group 4 compressed TIFF images and reflect the full and complete information contained in the original Document. Documents shall also be produced with the associated OCR, and with a load file, in accordance with b(viii).

b. Electronically Produced or Stored Material.

- i. All document data in electronic format must be scanned and confirmed free of computer viruses and provided with passwords necessary to access them.
- ii. Produce documents in the order in which you maintained them in your files, in copies of their original file folders, labeled with the folder's original file labels.
- iii. All attachments to responsive documents shall be produced attached to the responsive documents.
- iv. Provide a key to all abbreviations used in the documents and attach the key to the appropriate documents.
- v. No portion of any document shall be masked and the entire document shall be produced.
- vi. If a document is responsive to more than one demand, it shall be clearly marked to so indicate.
- vii. Indicate the demand(s) to which each document or answer responds in a metadata field titled "DemandNo."
- viii. Documents produced electronically and electronically stored information shall be produced in accordance with the following instructions:
 1. **Image Files:** Any documents produced in response to this Investigative Demand should be provided as a multi-page PDF file with embedded text and 8.5 x 11 inch page size that reflects how the source document would have appeared if printed, and which are named for the Bates number of first page of the document.
 2. **Text Files:** Document level text files containing extracted text or OCR should be provided for each document produced and named for the Bates number of first page of the document. To the extent that extracted text does not exist, the images should be run through Optical Character Recognition (OCR) so that they are fully searchable.
 3. **Load Files:** Load files shall be produced with each production of documents with extracted metadata for each document (objective coding) included in the load file. The data file shall include the fields and type of content set forth below. Objective coding shall be labeled

Appendix A

and produced on Production Media in accordance with the provisions set forth above.

- a. The data load file should contain all of the metadata fields (both system and application—see list below) from the original Native documents with an extension .CSV, .TXT, or .DAT for loading into the review platform.
 - b. The load file of extracted metadata should be delimited with ASCII 020 for the comma character and ASCII 254 for the quote character. All values in a multi-value field shall be separated by a semi-colon ASCII 059. The use of commas and quotes as delimiters is not acceptable.
 - c. The header row for the load files should contain the metadata field names which are listed below.
 - d. The image load file should contain an extension .OPT or .LFP.
4. **Document Unitization:** The boundaries of a document shall be based upon the smallest physical binding (*i.e.*, staple, paper clip, binder clip, etc.) associated with that document. In the event there is a series of loose pages that have no small physical bindings, the document boundary shall be based upon the largest physical binding (*i.e.*, folder, redwell, binder, etc.). The boundaries of the parent/child attachment relationship shall be based upon the largest physical binding (*i.e.*, binder clip, folder, redwell, etc.) associated with that family of documents. The document boundaries and corresponding parent/attachment relationships shall be provided in the load files furnished with each production.
5. **Bates Numbering:** Each page of a produced document shall have a legible, unique page identifier (Bates number) electronically branded onto the image at a location that does not obliterate, conceal, or interfere with any information from the source document. In order to ensure that the Bates numbers do not obscure portions of the documents, the images may be proportionally reduced to create a larger margin in which the Bates number may be branded. There shall be no other legend or stamp placed on the document image, except those sections of a document that are redacted to eliminate material protected from disclosure by the attorney-client or work product privileges shall have the legend “REDACTED” placed in the location where the redaction(s) occurred or shall otherwise note the location and/or location of the information for which such protections are claimed. If you have previously produced documents, begin the Bates number for subsequent productions with the Bates number following the Bates number of the last document page produced.
6. **File Naming Conventions:** Each PDF file shall be named with the unique Bates Number on the first page of the multi-page PDF file ending with a “.PDF” extension. Each document shall be named with

Appendix A

a unique document identifier. Attachments shall have their own unique document identifiers.

7. **Production Media:** All documents should be produced on CD-ROM, DVD, or external hard drive with standard Windows PC compatible interface (the production media). Each piece of production media shall identify a production volume number corresponding to the production “wave” the documents on the production media are associated with (*e.g.*, “V001,” “V002”), as well as the volume of the material in that production wave (*e.g.*, “-001,” “-002”). For example, if the first production wave comprises document images on three hard drives, each hard drive shall be labeled in the following manner: “V001-001,” “V001-002,” and “V001-003.” Additional information shall be identified on the physical production media including: (i) text referencing that it was produced in [Case Docket No.], (ii) the producing party’s name, (iii) the production date, and (iv) the Bates number range of the documents contained on the production media.
8. **Native Format for Excel and Access Databases:** To the extent that demanded documents exist in Excel or another spreadsheet program, produce the document in its native format. To the extent that the document format constitutes a database created or maintained in Access or another software program, produce the document in its native format. If the database is based upon proprietary software, produce whatever keys and instructions are necessary to review it. A single page PDF image placeholder should be provided for each document provided in native format. Each PDF placeholder shall contain the phrase “DOCUMENT PRODUCED IN NATIVE FORMAT” and contain the Bates number corresponding to the native file.
9. **PowerPoint Presentations:** Presentations should be produced in full slide image format along with speaker notes (which should follow the full images of the slides) with related searchable text, metadata, and bibliographic information. Presentations should also be produced in native format (*e.g.*, as .PPT files). The linked native file name should also match the BegDoc with the appropriate file extension.
10. **Audio and Video Data:** These specifications do not address the production of audio/video data. Care must be taken to ensure that all responsive audio and video data and their metadata are preserved. These data types may be stored in audio or video recordings, voicemail text messaging, and related/similar technologies.
11. **Production Exception Handling:** Any documents produced which cannot be converted to a PDF image due to a processing error must be reported along with the corresponding Bates number. Once an exception report for production is received, counsel for the State may request to see the native file for that exception.

Appendix A

- ix. Hard copies of documents to be produced in response to this Investigative Demand shall be produced in the following electronic format:
 - 1. Create electronic copies of the documents and produce them in accordance with the procedures described below, provided that you retain the originals from which the electronic copies were made until the final disposition of the matter;
 - 2. Include a load file with corresponding information, including the following data fields: BegDoc, EndDoc, Custodian, DocTitle, Filename, and DemandNo.;
 - 3. The Custodian field in the load file should contain the identity of the custodian or location from which the hard copy document was taken; and
 - 4. The DemandNo. field should contain the number of the demand(s) to which the document is responsive.
- x. For all documents produced, provide the following metadata fields:

REQUIRED METADATA FIELDS	
FIELD NAME	FIELD DESCRIPTION
BEGDOC	Beginning Bates number (production number)
ENDDOC	End Bates number (production number)
BEGATTACH	First Bates number of family range (<i>i.e.</i> , Bates number of the first page)
ENDATTACH	Last Bates number of family range (<i>i.e.</i> , Bates number of the last page of the last attachment)
ATTCOUNT	Number of attachments to an email
ATTACH	Populate parent records with original filenames of all attached records, separated by semi-colons
CUSTODIAN	Name of person from whose files the document is produced
AUTHOR	Author of the e-doc or attachment
RECIPIENTS	Recipients of e-doc
FROM	Sender of email
TO	Recipient of email
CC	Additional recipients of email
BCC	Blind additional recipients of email
FILESIZE	Size of the file
PGCOUNT	Number of pages in the e-doc
DATERECD	(mm/dd/yyyy) Date email was received
TIMERECD	Time email was received
DATESENT	(mm/dd/yyyy) Date sent
TIMESENT	Time sent
CRTDATE	(mm/dd/yyyy) Date created

Appendix A

CRTTIME	Time created
LASTMODDATE	(mm/dd/yyyy) Date last modified
LASTMODTIME	Time last modified
TITLE	Title field value extracted from the metadata of the native file
MODBY	Name of person(s) who modified e-doc
SUBJECT	The value in the subject field of an e-doc or e-attachment
FILENAME	The full name of the native file
FILE EXT	The extension of the file
MD5HASH	MD5 Hash Value created during processing
FULLPATH	File source path for all electronically collected documents, which includes location, folder name, file name, and file source extension
RECORDTYPE	Should contain the value of email, e-doc or e-attachment
APPLICATION	Name of the application used to open the file
VOLUME	Production volume number (<i>e.g.</i> , V001, V002 etc.)
COMMENT	Values extracted from comments metadata field
ENTRYID	Unique identifier of emails in mail stores
ATTLIST	List of each attribute on a previous defined element definition within a DTD
FAMILYDATE	(mm/dd/yyyy) Date value of parent file (email or e-doc)
DEMANDNO	Multi-entry field
NATIVELINK	The full path to the produced native on the production deliverable
TEXTPATH	The full path to the produced text files on the production deliverable