

MATTHEW O'REILLY

Plaintiff,

v.

WASTE MANAGEMENT, *et al.*

Defendants.

* IN THE
* CIRCUIT COURT
* FOR
* ANNE ARUNDEL COUNTY
* Case No.: C-02-CV-24-000546

* * * * *

**DEFENDANTS WASTE MANAGEMENT, INC., ADAM TSOTTLES,
ROY PALMER, AND WASTE MANAGEMENT OF MARYLAND, INC.'S
RESPONSES TO PLAINTIFF'S REQUEST FOR ADMISSIONS**

Defendants Waste Management, Inc. ("WMI"), Adam Tsottles, Roy Palmer, and Waste Management of Maryland, Inc. ("WMMD") (collectively, the "WM Defendants"), by and through their undersigned counsel and pursuant to Maryland Rule 2-424, hereby respond and object to the Request for Admissions ("Requests") propounded by Plaintiff Matthew O'Reilly ("Plaintiff"), as follows:

GENERAL RESPONSES AND OBJECTIONS

1. The WM Defendants reserve the right to amend their objections and responses to these Requests upon the receipt of new or clarifying information obtained during the course of discovery in this litigation.

2. The WM Defendants object to each and every Request as premature. The WM Defendants moved to dismiss the Second Amended Verified Complaint in its entirety on August 15, 2024 ("Motion to Dismiss), and the outcome of the WM Defendants' Motion to Dismiss will dictate which claims (if any) remain and the appropriate scope of discovery in this action. On August 2, 2024, the WM Defendants filed a Motion for Protective Order, seeking to temporarily stay discovery pending resolution of their Motion to Dismiss, which this Court denied on August

15, 2024—necessitating the instant objections and responses. By serving these objections and responses, the WM Defendants do not waive any of the arguments set forth in their Motion to Dismiss, and expressly reserve all rights and arguments for dismissal or otherwise.

3. WMI objects to each and every Request on the ground that discovery directed to WMI is improper because the Court lacks personal jurisdiction over WMI. The Motion to Dismiss seeks dismissal on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI.

4. The WM Defendants object to each and every Request to the extent that they seek information that is not relevant to the claims or defenses in this litigation, or are not proportionate to the needs of this case.

5. The WM Defendants object to each and every Request on the ground that the total volume of discovery served by Plaintiff, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

6. The WM Defendants object to each and every Request on the ground that they are unreasonably vague insofar as they include undefined, ambiguous terms.

7. The WM Defendants object to each and every Request on the ground that they are unreasonably vague and overbroad insofar that they are directed to all defendants.

8. The WM Defendants object to each and every Request to the extent that they seek disclosure of information that is subject to the attorney-client privilege, the attorney work-product doctrine, or any other applicable privilege.

9. The WM Defendants object to each and every Request to the extent that they seek to impose obligations upon the WM Defendants beyond the scope of the Maryland Rules.

10. The WM Defendants object to each and every Request to the extent that they seek authentication, facts, information, or knowledge of any document or information outside of the WM Defendants' knowledge, possession, custody, or control.

11. The WM Defendants object to each and every Request to the extent that they fail to set forth or describe with particularity the admission requested.

12. The WM Defendants do not waive any of their general or particular objections in the event they furnish information or documents coming within the scope of any such objections.

13. The information provided herein is disclosed without waiver of, and expressly reserving, the right to object to the admissibility of the information at any hearing or the trial in this action upon any grounds permitted by the Maryland Rules. The objections and the inability to admit or deny any Request because, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny such Request, shall not be deemed an admission of that Request.

14. The WM Defendants object to the use of the undefined term "WM" to the extent it includes entities that are not parties to this action. All responses are made solely by the WM Defendants. The WM Defendants further object to the definition of "WM" to the extent it includes the WM Defendants' attorneys or accountants, insofar as communications between the WM Defendants' and their attorneys and/or accountants are protected from disclosure by the attorney-client privilege, the accountant-client privilege and/or the work-product privilege.

15. The WM Defendants object to the use of the term "9E33rd" as vague, confusing and ambiguous insofar as it is not defined, and it is unclear as to who or what the term refers.

16. The WM Defendants object to the usage of headings in the Requests as vague and confusing. The WM Defendants include the headings as they appear in the Requests for ease of reference; however, they do not admit the truth of the contents of any such headings.

17. Each and every one of these General Objections is asserted as to all Requests and is incorporated by reference into each response set forth below.

SPECIFIC RESPONSES

The following apply to events at or around 9E33rd (including the 1200 block of Lovegrove St.) before October 16th, 2017.

Admit that:

REQUEST NO. 1: WM business included the removal of waste from 9E33rd.

RESPONSE NO. 1: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this

Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD's business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

REQUEST NO. 2: Waste Management, Inc. does business in Maryland.

RESPONSE NO. 2: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 3: Waste Management, Inc. is aware that it does business in Maryland.

RESPONSE NO. 3: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss

on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 4: The Waste Management, Inc. CEO and President admitted that Waste Management, Inc. is aware that it does business in every state except Wyoming and Montana - including Maryland - during a CNN interview in or before 2013.

RESPONSE NO. 4: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the term “CNN interview,” which is not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the

discovery of admissible evidence;. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 5: Waste Management Inc. controls aspects of the operations of its subsidiaries in Maryland.

RESPONSE NO. 5: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 6: Waste Management requires Waste Management of Maryland, Inc. to conform to, adopt, or otherwise implement policies, procedures, guidelines, protocols, standards, training, and/or other forms of action or inaction that limit the independence of Waste Management of Maryland, Inc.

RESPONSE NO. 6: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to

WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 7: Waste Management of Maryland, Inc. was not a party to the contract for services with 9E33rd.

RESPONSE NO. 7: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the terms “contract” and “9E33rd,” which is not defined and susceptible to multiple interpretations and seeks information

that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD was a party to a contract that involved the provision of waste removal services at 3200 St. Paul Street, Baltimore, Maryland, 21218.

REQUEST NO. 8: Waste Management, Inc. was a party to the contract for services with 9E33rd.

RESPONSE NO. 8: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the terms “contract” and “9E33rd,” which are not defined and susceptible to multiple interpretations and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to

this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 9: A subsidiary of Waste Management, Inc. other than Waste Management of Maryland, Inc. was a party to the contract for services with 9E33rd.

RESPONSE NO. 9: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the terms “contract” and “9E33rd,” which are not defined and susceptible to multiple interpretations and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 10: WM collected waste on multiple occasions from 9E33rd between the hours of 11:00 PM and 7:00 AM, while prohibited by law from doing so.

RESPONSE NO. 10: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 11: Mr. O’Reilly registered complaints about WM’s operations at 9E33rd with the Commissioner of the Health Department for Baltimore on multiple occasions.

RESPONSE NO. 11: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 12: The Health Department for Baltimore contacted WM regarding violations of the Baltimore City Health Code at 9E33rd on multiple occasions.

RESPONSE NO. 12: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 13: The Health Department for Baltimore contacted 9E33rd regarding violations of the Baltimore City Health Code at 9E33rd on multiple occasions.

RESPONSE NO. 13: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 14: The contract for removal of waste from 9E33rd was initiated by and for the benefit of 9E33rd.

RESPONSE NO. 14: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 15: WM vehicles operated at 9E33rd on average three times per week throughout 2017.

RESPONSE NO. 15: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as

to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD’s business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

REQUEST NO. 16: The WM vehicles that operated at 9E33rd in 2017 regularly emitted sound at levels and for durations exceeding the limits of the Baltimore City Health Code while operating at 9E33rd.

RESPONSE NO. 16: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to

lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 17: The WM vehicles that collected waste from 9E33rd in 2017 were incapable of collecting waste from 9E33rd while emitting sound at levels and for durations that do not exceed the limits of the Baltimore City Health Code.

RESPONSE NO. 17: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request

on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 18: Mr. O'Reilly approached 9E33rd on multiple occasions to ask that WM reduce the noise levels, durations, and/or change the hours of operation.

RESPONSE NO. 18: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms "WM" and "9E33rd," which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants construe the term "9E33rd" to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 19: Mr. O'Reilly approached WM on several occasions to ask that WM reduce the noise levels, durations, and/or change the hours of operation.

RESPONSE NO. 19: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms "WM," which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted that Plaintiff approached certain of WMMD's customer service employees and Mr. Tsottles regarding WMMD's waste removal services at 3200 St. Paul Street, Baltimore, Maryland 21218 prior to October 16, 2017.

REQUEST NO. 20: Adam Tsottles promised Mr. O'Reilly in September 2017 that WM would cease collections at 9E33rd before 10:00 AM any day.

RESPONSE NO. 20: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms "WM" and "9E33rd," which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks information that is protected by the attorney-client privilege and/or work product doctrine; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants construe the term "9E33rd" to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 21: The failure of WM to abide by Tsottles’ promise led directly to the events that caused further harm to Mr. O’Reilly.

RESPONSE NO. 21: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

The following apply to the events in question at or around 9E33rd (including the 1200 block of Lovegrove St.) on October 16th, 2017.

Admit that:

REQUEST NO. 22: Adam Tsottles was not present for the events of October 16th.

RESPONSE NO. 22: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted that Mr. Tsottles was not present for the incident that occurred on October 16, 2017 at 3200 St. Paul Street, Baltimore, Maryland 21218, involving Plaintiff (“Incident”).

REQUEST NO. 23: Tsottles did not personally experience any of the events in question.

RESPONSE NO. 23: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the term “experience” and language “events in question”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles was not present for the Incident.

REQUEST NO. 24: The only knowledge Tsottles had about the events is through hearsay.

RESPONSE NO. 24: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the term “events”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery

served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 25: Tsottles had and has no personal knowledge of the events in question.

RESPONSE NO. 25: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the language “events in question”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles was not present for the Incident.

REQUEST NO. 26: WM arrived at 9E33rd before 10:00 AM to perform collections.

RESPONSE NO. 26: The WM Defendants incorporate their General Objections. The

WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted that certain of WMMD’s employees arrived at or around 3200 St. Paul Street, Baltimore, Maryland, 21218 before 10:00 AM to perform collections on October 16, 2017.

REQUEST NO. 27: Roy Palmer was present.

RESPONSE NO. 27: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until

the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous insofar as it is unclear the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted that Mr. Palmer was present for the Incident.

REQUEST NO. 28: A WM-branded vehicle was present.

RESPONSE NO. 28: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations, and because it is unclear as to the subject of the Request; seeks information that is neither relevant

nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that a WMMD vehicle was present at the Incident.

REQUEST NO. 29: Palmer was engaged in WM business.

RESPONSE NO. 29: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad at to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer was acting

within the scope of his employment for WMMD at or around the time of the Incident.

REQUEST NO. 30: Palmer drove the WM-branded truck.

RESPONSE NO. 30: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer drove a WMMD vehicle at or around the time of the Incident.

REQUEST NO. 31: Palmer driving the truck was part of his function performing WM business.

RESPONSE NO. 31: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer was acting within the scope of his employment for WMMD at or around the time of the Incident.

REQUEST NO. 32: Palmer could see that where Mr. O’Reilly was in relation to the truck from the driver’s seat of the truck.

RESPONSE NO. 32: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer was present at the Incident and could see Plaintiff from the driver's seat of the truck.

REQUEST NO. 33: Palmer drove the WM-branded truck in a manner that could cause the truck to strike (physically come into contact with) Mr. O'Reilly.

RESPONSE NO. 33: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term "WM," which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total

volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 34: Palmer drove the WM-branded truck in a manner that caused the truck to strike (physically come into contact with) Mr. O'Reilly.

RESPONSE NO. 34: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term "WM," which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 35: Palmer intentionally drove the WM-branded truck in a manner that caused it to strike (physically come into contact with) Mr. O'Reilly.

RESPONSE NO. 35: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 36: The truck striking Mr. O’Reilly caused him to be knocked down.

RESPONSE NO. 36: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is

inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 37: The truck injured Mr. O'Reilly by striking him.

RESPONSE NO. 37: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery

served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 38: the truck caused Mr. O'Reilly to be injured as a result of being struck.

RESPONSE NO. 38: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 39: There was no physical interaction between Mr. O'Reilly and Palmer or Henry Prioleau prior to Palmer striking Mr. O'Reilly with the truck.

RESPONSE NO. 39: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 40: The only words exchanged between Mr. O'Reilly and Palmer before Palmer struck Mr. O'Reilly were non-confrontational (not elevated in tone or rhetoric; not aggressively delivered; and/or not intended to provoke or escalate).

RESPONSE NO. 40: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 41: There was no interaction whatsoever between Mr. O'Reilly and Prioleau before Palmer struck Mr. O'Reilly with the truck.

RESPONSE NO. 41: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 42: Mr. O'Reilly did not interact with Henry Prioleau until after he had been struck by Palmer in the truck.

RESPONSE NO. 42: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 43: Cameras mounted in and on the truck recorded the incident.

RESPONSE NO. 43: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is

inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the language “the incident”; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that DriveCam technology included on the WMMD vehicle present at the Incident recorded certain aspects of the Incident.

REQUEST NO. 44: Cameras mounted to and around 9E33rd recorded the incident.

RESPONSE NO. 44: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations, and as to the language “the incident”; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to the

building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 45: WM had access to the recordings from the truck.

RESPONSE NO. 45: The WM Defendants object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD had access to certain recordings taken by WMMD of certain aspects of the Incident.

REQUEST NO. 46: 9E33rd had access to the recordings from 9E33rd.

RESPONSE NO. 46: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 47: Mr. O’Reilly did not have access to the recordings from the truck or from 9E33rd.

RESPONSE NO. 47: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 48: WM was aware that Mr. O’Reilly did not have access to the truck recordings.

RESPONSE NO. 48: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations; is unduly burdensome and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that certain of WMMD’s employees were aware that, as of October 16, 2017, Plaintiff did not have access to certain of the recordings of certain aspects of the Incident taken by WMMD.

REQUEST NO. 49: 9E33rd was aware that Mr. O’Reilly did not have access to the truck recordings or the 9E33rd recordings.

RESPONSE NO. 49: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is

inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 50: The recordings from the truck were available to Tsottles.

RESPONSE NO. 50: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD had access to certain of the recordings of certain aspects of the Incident taken by WMMD.

REQUEST NO. 51: The recordings from the truck were available to others at WM.

RESPONSE NO. 51: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that certain of WMMD had access to certain of the recordings of certain aspects of the Incident taken by WMMD.

REQUEST NO. 52: Persons other than Tsottles viewed the recordings from the truck.

RESPONSE NO. 52: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 53: Palmer communicated information to Tsottles about the events on October 16th.

RESPONSE NO. 53: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that certain of WMMD’s employees discussed the Incident.

REQUEST NO. 54: Palmer knew that Tsottles would use the information he communicated to Tsottles to file charges against Mr. O’Reilly.

RESPONSE NO. 54: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until

the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 55: Palmer knew some of the information he communicated to Tsottles was false.

RESPONSE NO. 55: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client

privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 56: Palmer knew some of the information he communicated to Tsottles was misleading.

RESPONSE NO. 56: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 57: Palmer knew some of the information he communicated to Tsottles omitted information that would have caused Tsottles to know that the allegations were false.

RESPONSE NO. 57: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 58: Tsottles knew some of the information communicated to him by Palmer was false.

RESPONSE NO. 58: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 59: Tsottles knew some of the information communicated to him by Palmer was misleading.

RESPONSE NO. 59: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 60: Tsottles knew Palmer omitted some information communicated to him that would have caused Tsottles to know that the allegations were false before he made them.

RESPONSE NO. 60: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

The following apply to the events at the Baltimore City District Court on October 17th, 2017:

Admit that:

REQUEST NO. 61: Tsottles' actions benefitted WM.

RESPONSE NO. 61: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations, as to the term “actions,” and because it is not clear as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 62: Tsottles omitted relevant information on the Application for Statement of Charges against Mr. O’Reilly.

RESPONSE NO. 62: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 63: Tsottles misrepresented that he was present for the events alleged in the Application for Statement of Charges.

RESPONSE NO. 63: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which

includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 64: Tsottles wrote the contents of the Application for Statement of Charges in his own hand.

RESPONSE NO. 64: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the language “in his own hand”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

REQUEST NO. 65: Tsottles swore that the contents of the Application for Statement of Charges were true.

RESPONSE NO. 65: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and seeks information that is protected by the attorney-client privilege and/or work product doctrine; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied, except admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

REQUEST NO. 66: Tsottles was in possession of information that would have caused him to know the allegations were false.

RESPONSE NO. 66: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 67: Tsottles was aware that he was in possession of information that would have caused him to know the allegations were false.

RESPONSE NO. 67: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and seeks information that is protected by the

attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 68: Tsottles intentionally made the allegations in front of a third party.

RESPONSE NO. 68: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “allegations,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “allegations” to refer to the Application for Statement of Charges prepared and filed by Mr. Tsottles on October 17, 2017. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied, except admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

REQUEST NO. 69: Tsottles made the allegations in front of a Magistrate.

RESPONSE NO. 69: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “allegations,” which is not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “allegations” to refer to the Application for Statement of Charges prepared and filed by Mr. Tsottles on October 17, 2017. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied, except admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

REQUEST NO. 70: Tsottles represented to the Magistrate that he was acting on behalf of WM.

RESPONSE NO. 70: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied, except admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

REQUEST NO. 71: Tsottles could have viewed the videos prior to filing the Application for Statement of Charges against Mr. O’Reilly.

RESPONSE NO. 71: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until

the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the term “videos”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

REQUEST NO. 72: Tsottles was aware he could have viewed the videos prior to filing the Application for Statement of Charges against Mr. O’Reilly.

RESPONSE NO. 72: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the term “videos”; seeks

information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

REQUEST NO. 73: Tsottles viewed the videos prior to filing the Application for Statement of Charges against Mr. O'Reilly.

RESPONSE NO. 73: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous as to the term "videos"; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

REQUEST NO. 74: Tsottles accused Mr. O'Reilly of attempted theft.

RESPONSE NO. 74: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

REQUEST NO. 75: Tsottles accused Mr. O'Reilly of malicious destruction of property.

RESPONSE NO. 75: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

REQUEST NO. 76: Tsottles accused Mr. O'Reilly of assault of Henry Prioleau.

RESPONSE NO. 76: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

REQUEST NO. 77: Attempted theft is a crime of moral turpitude in Maryland.

RESPONSE NO. 77: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a

legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 78: Tsottles knew that Mr. O'Reilly did not "attempt to steal" (i.e., permanently deprived WM of possession of) the truck.

RESPONSE NO. 78: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term "WM," which is not defined and susceptible to multiple interpretations and because the subject of this Request is not clear; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term "WM" to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 79: A reasonable person would have known that that Mr. O'Reilly did not "attempt to steal" the truck.

RESPONSE NO. 79: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 80: A person of reasonable prudence would have known that the phrase O'Reilly attempted to steal the vehicle" was not true.

RESPONSE NO. 80: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 81: The allegation of attempted theft was untrue.

RESPONSE NO. 81: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the

ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 82: Mr. O'Reilly did not attempt to steal the truck.

RESPONSE NO. 82: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the term "truck" and the subject matter of the Request generally; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 83: The allegation of malicious destruction of property was untrue.

RESPONSE NO. 83: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 84: Mr. O'Reilly did not maliciously destroy property

RESPONSE NO. 84: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 85: The allegation of the assault of Henry Prioleau was untrue.

RESPONSE NO. 85: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the

ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 86: Mr. O'Reilly did not contact Prioleau without just cause or

RESPONSE NO. 86: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

The following apply to events at or around 9E33rd (including the 1200 block of Lovegrove St.) after October 16th, 2017.

Admit that:

REQUEST NO. 87: WM business included the removal of waste from 9E33rd.

RESPONSE NO. 87: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD’s business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

REQUEST NO. 88: Mr. O’Reilly requested relevant recordings from 9E33rd on multiple occasions.

RESPONSE NO. 88: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 89: Persons at 9E33rd viewed the recordings from 9E33rd.

RESPONSE NO. 89: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations, and as to the term “recordings”; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 90: 9E33rd repeatedly refused to release the recordings to Mr. O’Reilly.

RESPONSE NO. 90: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations, and as to the term “recordings”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 91: WM collected waste on multiple occasions from 9E33rd between the hours of 11:00 PM and 7:00 AM, while prohibited by law from doing so.

RESPONSE NO. 91: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 92: Mr. O’Reilly registered complaints about WM’s operations at 9E33rd with the Commissioner of the Health Department for Baltimore on multiple occasions.

RESPONSE NO. 92: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to

lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 93: The Health Department for Baltimore contacted WM regarding violations of the Baltimore City Health Code at 9E33rd on multiple occasions.

RESPONSE NO. 93: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the

building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 94: The Health Department for Baltimore contacted 9E33rd regarding violations of the Baltimore City Health Code at 9E33rd on multiple occasions.

RESPONSE NO. 94: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “9E33rd,” which is not defined and susceptible to multiple interpretations; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 95: WM vehicles operated at 9E33rd on average three times per week throughout (2018, 2019, 2020).

RESPONSE NO. 95: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that WMMD’s trucks operated at or around 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

REQUEST NO. 96: The WM vehicles that operated at 9E33rd in (2017, 2018, 2019, 2020) regularly emitted sound at levels and for durations exceeding the limits of the Baltimore City Health Code while operating at 9E33rd.

RESPONSE NO. 96: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO 97: the WM vehicles that collected waste from 9E33rd in (2017, 2018, 2019, 2020) were incapable of collecting waste from 9E33rd while emitting sound at levels and for durations that do not exceed the limits of the Baltimore City Health Code.

RESPONSE NO. 97: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to the building located at 9 E 33rd St, Baltimore, MD 21218. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 98: Mr. O’Reilly approached 9E33rd on multiple occasions to ask that WM reduce the noise levels, durations, and/or change the hours of operation.

RESPONSE NO. 98: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until

the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 99: 9E33rd did not change the times, noise levels, or methods of collection by WM in (2017, 2018, 2019, 2020).

RESPONSE NO. 99: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the terms “WM” and “9E33rd,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants construe the term “9E33rd” to refer to Defendant Capstone On-Campus Management, LLC and/or Defendant Beatty Management Group, LLC. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is denied.

REQUEST NO. 100: WM did not change the times, noise levels, or methods of collection by WM in (2017, 2018, 2019, 2020).

RESPONSE NO. 100: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “WM,” which is not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that the Request is too broad and ambiguous to enable a response and, therefore, the Request is denied.

The following apply to the events at the Baltimore City District Court on November 28th, 2017.

Admit that:

REQUEST NO. 101: Tsottles was present.

RESPONSE NO. 101: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on

the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 102: Palmer was present.

RESPONSE NO. 102: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject matter of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 103: Tsottles repeated false allegations against Mr. O'Reilly

RESPONSE NO. 103: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 104: Palmer made false allegations against Mr. O'Reilly.

RESPONSE NO. 104: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the

discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 105: Palmer disclosed the “cell phone video” to the prosecutor.

RESPONSE NO. 105: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the term “cell phone video” and the subject of the Request generally; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that a cell phone recording of certain aspects of the Incident was provided to the prosecutor in connection with the criminal proceedings.

REQUEST NO. 106: Tsottles told the prosecutor that Mr. O'Reilly attempted to steal the truck.

RESPONSE NO. 106: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident and provided information to the prosecutor.

REQUEST NO. 107: Palmer told the prosecutor that Mr. O'Reilly attempted to steal the truck.

RESPONSE NO. 107: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

The following apply to the events at the Baltimore City Circuit Court in 2018.

Admit that:

REQUEST NO. 108: Tsottles was present.

RESPONSE NO. 108: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 109: Palmer was present.

RESPONSE NO. 109: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 110: WM withheld the recordings from the truck cameras

RESPONSE NO. 110: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “WM,” which is not defined and susceptible to multiple interpretations, as to the language “recordings from the truck cameras,” and as to the subject of the Request generally; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “WM” to refer to the WM Defendants only. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 111: Tsottles repeated false allegations against Mr. O’Reilly

RESPONSE NO. 111: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 112: Palmer repeated false allegations against Mr. O'Reilly.

RESPONSE NO. 112: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

The following apply to the action before the United States District Court for the District of Maryland.

Admit that:

REQUEST NO. 113: Tsottles' affidavit to the United States District Court of Maryland was affirmed "upon personal knowledge" that Tsottles did not possess.

RESPONSE NO. 113: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term "affidavit," which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information

that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “affidavit” to refer to the affidavit executed by Mr. Tsottles on June 24, 2019, and filed with the United States District Court for the District of Maryland in the case captioned *O'Reilly v. Tsottles, et al.*, No. CV GLR-18-3622 that same day. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 114: Tsottles was aware when he signed the affidavit that he did not possess personal knowledge of the recording of the video.

RESPONSE NO. 114: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “affidavit,” which is not defined and susceptible to multiple interpretations, and as to the language “recording of the video”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “affidavit” to refer to the affidavit executed by Mr. Tsottles on June 24, 2019, and filed with the United States District

Court for the District of Maryland in the case captioned *O'Reilly v. Tsottles, et al.*, No. CV GLR-18-3622 that same day. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

The following apply generally.

Admit that:

REQUEST NO. 115: Mr. O'Reilly's standing and reputation could have been harmed by the words and action of the defendants.

RESPONSE NO. 115: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a

response is required, denied.

REQUEST NO. 116: Mr. O'Reilly's personal standing and reputation was harmed as a result of the words and action of Tsottles and Palmer.

RESPONSE NO. 116: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 117: [BLANK]

RESPONSE NO. 117: No response is required.

REQUEST NO. 118: Tsottles' affidavit to the United States District Court of Maryland was affirmed "upon personal knowledge" that Tsottles did not possess.

RESPONSE NO. 118: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “affidavit,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is duplicative; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “affidavit” to refer to the affidavit executed by Mr. Tsottles on June 24, 2019, and filed with the United States District Court for the District of Maryland in the case captioned *O'Reilly v. Tsottles, et al.*, No. CV GLR-18-3622 that same day. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 119: Tsottles was aware when he signed the affidavit that he did not possess personal knowledge of the recording of the video.

RESPONSE NO. 119: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is vague and ambiguous, particularly as to the term “affidavit,” which is not defined and susceptible to multiple interpretations, and as to the language “recording of the video”; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is duplicative; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants construe the term “affidavit” to refer to the affidavit executed by Mr. Tsottles on June 24, 2019, and filed with the United States District Court for the District of Maryland in the case captioned *O'Reilly v. Tsottles, et al.*, No. CV GLR-18-3622 that same day. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, denied.

REQUEST NO. 120: The only way for Mr. O'Reilly to know that Tsottles defamed him was by reading Tsottles' own writing.

RESPONSE NO. 120: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks information that is protected by the attorney-client privilege and/or work product doctrine; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 121: Mr. O'Reilly has been harmed as a result of the actions of Tsottles.

RESPONSE NO. 121: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The

WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 122: Mr. O'Reilly has been harmed as a result of the actions of Palmer.

RESPONSE NO. 122: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 123: Mr. O'Reilly has been harmed as a result of the actions of Waste Management of Maryland, Inc.

RESPONSE NO. 123: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 124: Mr. O'Reilly has been harmed as a result of the actions of Capstone On-Campus Management.

RESPONSE NO. 124: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 125: Mr. O'Reilly has been harmed as a result of the actions of Beatty Management.

RESPONSE NO. 125: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery

served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 126: Mr. O'Reilly has been harmed as a result of the actions of Waste Management, Inc.

RESPONSE NO. 126: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 127: Mr. O'Reilly has been harmed as a result of the inaction of Tsottles.

RESPONSE NO. 127: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 128: Mr. O'Reilly has been harmed as a result of the inaction of Palmer.

RESPONSE NO. 128: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 129: Mr. O'Reilly has been harmed as a result of the inaction of Waste Management of Maryland, Inc.

RESPONSE NO. 129: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery

served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 130: Mr. O'Reilly has been harmed as a result of the inaction of Capstone On-Campus Management.

RESPONSE NO. 130: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 131: Mr. O'Reilly has been harmed as a result of the inaction of Beatty Management.

RESPONSE NO. 131: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 132: Mr. O'Reilly has been harmed as a result of the inaction of Waste Management, Inc.

RESPONSE NO. 132: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 133: Mr. O'Reilly lost parts of his liberty as a result of the actions of Tsottles.

RESPONSE NO. 133: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery

served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

REQUEST NO. 134: Mr. O'Reilly lost parts of his liberty as a result of the actions of Palmer.

RESPONSE NO. 134: The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is equally available to Plaintiff. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive. The WM Defendants further object to this Request on the ground that it calls for a legal conclusion and, therefore, no response is required. To the extent a response is required, denied.

Respectfully submitted,

/s/ Geoffrey M. Gamble
Geoffrey M. Gamble (AIS #0812160296)
SAUL EWING LLP
1001 Fleet Street, 9th Floor
Baltimore, Maryland 21202
(p) 410-332-8848
(f) 410-332-8115
geoff.gamble@saul.com

Nicole E. Chammas (AIS #2006160048)
SAUL EWING LLP
1919 Pennsylvania Avenue, NW Suite 550
Washington, DC 20006
(202) 295-6613
(202) 337-6065 (fax)
nicole.chammas@saul.com

*Counsel for Defendants Waste Management,
Inc., Adam Tsottles, Roy Palmer, and
Waste Management of Maryland, Inc.*

Dated: August 23, 2024

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, on this 23rd day of August, 2024, a copy of the foregoing Defendants Waste Management, Inc., Adam Tsottles, Roy Palmer, and Waste Management of Maryland, Inc. Responses to Plaintiff's Request for Admissions was served, through the MDEC system, on the following persons entitled to such service:

Matthew O'Reilly
14316 Reese Boulevard, B101
Huntersville, NC 28078
aacircuit-wmi@moreilly.com
postmaster@moreilly.com
maryland.tylerhost.net@moreilly.com
Plaintiff

James S. Aist
Adrianna M. Bethea
Briana N. Maine
Anderson, Coe & King, LLP
Seven Saint Paul Street, Suite 1600
Baltimore, MD 21202
aist@acklaw.com
bethea@acklaw.com
maine@acklaw.com
*Counsel for Defendant Capstone
On-Campus Management LLS*

Ralph L. Arnsdorf
Scott H. Phillips
Two North Charles Street, Suite 600
Baltimore, Maryland 21201
ranrsdorf@fandpnet.com / sphillips@fandpnet.com
Counsel for Defendant Beatty Management Group, LLC

and via first-class mail, postage prepaid, on:

Tamla Oates-Forney
9800 Fredericksburg Road
San Antonio, TX 78288

/s/ Geoffrey M. Gamble
Geoffrey M. Gamble