

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 PRODUCTION OF DOCUMENTS**

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 Production of Documents ("Requests") propounded by Plaintiff Matthew O'Reilly ("Plaintiff"), as follows:

**GENERAL RESPONSES AND OBJECTIONS**

1. These general responses and objections form a part of the response to each and every Request. Thus, the absence of a reference to a general objection should not be construed as a waiver of the general objection to a specific Request, nor deemed as an admission that the WM Defendants possess document(s) called for by the Request.

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 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.

5. The WM Defendants object to the request for production of documents within the time provided in the Requests in light of the unduly burdensome and oppressive total volume of discovery and the infancy of the above-captioned action. The WM Defendants are engaging in diligent efforts and will work to identify the documents requested, but their investigation, collection, and review of these documents for responsiveness to Plaintiff's Requests and privilege, among other things, remains ongoing. The WM Defendants will produce documents at a mutually agreeable time in a mutually agreeable manner.

6. 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.

7. The WM Defendants reserve their right to amend, modify, and/or supplement their answers to Plaintiff's Requests up to and at the time of trial in accordance with Maryland Rule 2-401(e).

8. The WM Defendants' responses to Plaintiff's Requests are and have been made without waiving or intending to waive, but to the contrary preserving: (a) the attorney-client privilege, work-product immunity, and any other applicable privilege or immunity under state or federal law; (b) the right to object, on the grounds of privilege, immunity, relevance, materiality, or any other proper ground, to the use of the documents produced in response to Plaintiff's Requests in any subsequent proceeding in this or any other action; and (c) the right at any time to revise, correct, add to, and clarify any of the objections and responses herein or the documents produced pursuant to said objections and responses.

9. By responding to Plaintiff's Requests, the WM Defendants do not waive or intend to waive, but to the contrary preserves all objections, qualifications, and reservations set forth in these objections and responses even though the WM Defendants may, in the interest of prompt and expeditious conduct of discovery, provide documents over such objections, qualifications, and reservations. Furthermore, by responding to Plaintiff's Requests, the WM Defendants do not admit or adopt any of the facts, characterizations, definitions, or conclusions contained therein.

10. Each response to Plaintiff's Requests is subject to all objections as to completeness, relevance, materiality, privilege, and/or admissibility and to any and all other objections on any grounds that would require the exclusion of any statement contained in the documents requested herein or statements made by a witness present and testifying in court or other judicial proceeding referring to such documents, all of which objections and grounds are expressly preserved and may be interposed at the time of the proceeding.

11. Any objection or failure to object to any of Plaintiff's Requests is not to be deemed an admission that the WM Defendants possess the document(s) called for by the Request.

12. The WM Defendants object to each of Plaintiff's Requests to the extent that any Request calls for the disclosure of the mental impressions of its legal counsel or of information protected by the attorney-client privilege, the work-product doctrine, legal privileges recognized by applicable governing law, or any other applicable privileges and immunities. The WM Defendants also object to each of Plaintiff's Requests to the extent that any such Request seeks information prepared in anticipation of litigation, unless and until Plaintiff, by the requisite showing of need and cause, obtains an order requiring the disclosure of such information.

13. The WM Defendants object to each of Plaintiff's Requests to the extent that any Request is overly broad, unduly burdensome, or unreasonably cumulative or duplicative; requests information already known or that is obtainable from another source that is more convenient, less burdensome or less expensive; is vague or ambiguous; is not relevant to the subject matter of this action, does not relate to any claim or defense, or is not reasonably calculated to lead to the discovery of admissible evidence; or is not proportional to the needs of this matter.

14. The WM Defendants object to any and all instructions, definitions, or Requests that seek responses beyond that reasonably required by the Maryland Rules and any order of the Court in this proceeding.

15. The WM Defendants object to each of Plaintiff's Requests to the extent that any Request seeks the production of documents containing confidential and/or proprietary personal or business information, the use of which outside the context of this litigation may cause undue harm or competitive disadvantage to the WM Defendants or WMI's and WMMD's current and former employees. Except as otherwise indicated in any specific response, the WM Defendants shall

produce such confidential or proprietary information in accordance with the terms of an agreed protective order or other similar order of the Court.

16. The WM Defendants object to each of Plaintiff's Requests to the extent that any Request seeks information that is not within the possession, custody, or control of the WM Defendants, including documents that have been deleted or destroyed in accordance with any document retention policy, or documents that are in the possession or control of any individual or entity other than the WM Defendants.

17. The WM Defendants object to these Requests to the extent that they are not limited in time and/or seek information outside the time period relevant to this litigation.

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

19. These Requests have been interpreted and answered in accordance with plain English usage and meaning, and the WM Defendants' responses reflect only the present state of their knowledge. Because discovery is ongoing, the WM Defendants reserve the right to amend, modify, or supplement their responses upon the receipt of new or clarifying information obtained during the course of this litigation.

20. The information provided herein is disclosed without waiver of, and expressly reserving, the right to object to the admissibility of the information at trial upon any grounds permitted by the Maryland Rules.

21. Unless otherwise stated, the terms defined in the Requests for Production of Documents shall be given their defined meanings when used herein.

22. The information in these responses and objections is not based solely on the knowledge of the executing party, but includes the knowledge of the party, its agents,

representatives and, unless privileged, its attorneys. The word usage and sentence structure may be that of the attorney assisting in the preparation of these responses and objections and, thus, does not necessarily purport to be the precise language of the executing party.

23. Nothing contained in these responses shall be construed as a waiver of the WM Defendants' right to object to the usage of the information disclosed herein or any documents produced in response to any of the Requests on the ground of, among other things, relevance.

24. The WM Defendants object to the definition of "You/Your" 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 "You/Your" 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.

25. The WM Defendants object to the definition of "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.

26. 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.

27. 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.

## **REQUESTS FOR PRODUCTION OF DOCUMENTS AND RESPONSES**

### **GENERAL DOCUMENT REQUESTS**

**REQUEST NO. 1:** Any document prepared during the regular course of business related to the events referred to of in the complaint.

**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 as to time; is vague and ambiguous; is unduly burdensome; 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, the WM Defendants state that they will produce non-privileged documents and communications that relate to the incident that occurred on October 16, 2017 at 3200 St. Paul Street, Baltimore, Maryland 21218, involving Plaintiff (the “Incident”), the Application for Statement of Charges filed on or about October 17, 2017 (“Charging Document”), and the criminal proceedings that followed (the “Criminal Proceedings”) in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 2:** Any document prepared during the regular course of business as a result of the occurrence complained of in Plaintiff's Complaint.

**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 as to time; is vague and ambiguous; is unduly burdensome; is duplicative; 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, the **WM Defendants state that they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 3:** Any photographs taken regarding the vehicles, the scene, or any other matter relevant to the occurrence.

**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 as to time; is vague and ambiguous, particularly as to the terms “vehicles,” “the scene,” “occurrence,” and “any other matter,” which are not defined and susceptible to multiple interpretations; and because is not clear as to the subject of the Request; is unduly burdensome; 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, **the WM Defendants state that they will produce** non-privileged documents (including photographs) and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 4:** Any video surveillance or imaging of the Plaintiff.

**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 as to time; is vague and ambiguous, particularly as to the terms “video surveillance” and “imaging,” 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 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 they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 5:** All insurance policies including liability, general liability, excess umbrella for the vehicle, and any other insurance that will, or may, cover the occurrence.

**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; is vague and ambiguous as to the terms “vehicle” and “occurrence”; 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, **the WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.**

**REQUEST NO. 6:** All written, recorded, or signed statements of any party, including the Plaintiff, Defendants, witnesses, investigators or agents, representatives or employees of the parties concerning the subject matter of this action.

**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; 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, **the WM Defendants state that they will produce** any non-privileged written statements that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are

able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 7:** All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiff or property damage.

**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 overbroad; is vague and ambiguous; 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 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 they will produce non-privileged documents (including photographs or video recordings) and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 8:** Any documents received pursuant to any subpoena requests.

**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 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, the WM Defendants state that no such documents currently exist, but that they will supplement their response to this Request as appropriate.

**REQUEST NO. 9:** Copies of any treatise, standards in the industry, legal authority, rule, case, statute or code that will be relied upon in the defense of this case.

**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 overbroad; is vague and ambiguous as to the language “standards in the industry”; 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, **the WM Defendants refer Plaintiff to its motion to dismiss briefing in this action, but that it otherwise will not produce the documents requested.**

**REQUEST NO. 10:** Any recordings taken regarding the vehicles, the scene, or any other matter relevant to the occurrence.

**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 as to time; is vague and ambiguous, particularly as to the terms “recordings,” “vehicles,” “the scene,” and “any other matter,” which are not defined and susceptible to multiple interpretations and because it is not clear as to the

subject of the Request; is unduly burdensome; is duplicative; 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, the WM Defendants state that they will produce any non-privileged video recordings that relate to the Incident in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 11:** Any video surveillance or imaging at 9E33rd.

**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 as to time; is vague and ambiguous, particularly as to the terms “9E33rd,” “video surveillance,” and “imaging,” which are not defined and susceptible to multiple interpretations; is not clear 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 personal information of third parties. 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 there are no documents responsive to this Request in their possession, custody, or control.

**REQUEST NO. 12:** Any safety manuals, or driver or operator manuals in effect.

**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 as to time; is vague and ambiguous, particularly as to the terms “safety manuals” and “driver or operator manuals,” 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 trade secret and/or personal information. 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.

Based on these objections, the documents requested are not being produced.

**REQUEST NO. 13:** All insurance policies that would cover the occurrence.



**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; is vague and ambiguous as to the term “occurrence”; is unduly burdensome; is duplicative; 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, *see* the WM Defendants’ Response to Request for Production No. 5.

**REQUEST NO. 14:** All written, recorded, or signed statements of any party, including the Plaintiff, Defendants, witnesses, investigators or agents, representatives or employees of the parties concerning the subject matter of this action.

**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; is unduly burdensome; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 6.**

**REQUEST NO. 15:** All photographs, videotapes or audio tapes, x-rays, diagrams, medical records, surveys or other graphic representations of information concerning the subject matter of this action, the Plaintiff, or related matters.

**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; is unduly burdensome; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 7.

**REQUEST NO. 16:** Any documents received pursuant to any subpoena requests.

**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 as to time; is vague and ambiguous as to the subject of the Request; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 8.

**REQUEST NO. 17:** All statements which were previously made by you and any of your present or former directors, officers, contractors, or employees, and those of your affiliates, contractors, or subsidiaries concerning the action or its subject matter.

**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; is not clear as to the subject of the Request; is unduly burdensome; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 6.

**REQUEST NO. 18:** All documents (including, but not limited to, correspondence, notes, memoranda, and journal entries) which relate to, describe, summarize, or memorialize any communication between the parties or persons within the parties, or anyone known or believed by you to have been acting under the authority of any party, concerning the occurrence.

**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; is vague and ambiguous, particularly as to the term “occurrence,” which is undefined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; 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, **the WM Defendants state that they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry.**

**REQUEST NO. 19:** All documents (including, but not limited to, fee agreements, reports, and correspondence) provided to, received from, or prepared by each witness or in connection with any witness known to you.

**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; 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; information; is premature; 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, **the WM Defendants state that that they will identify any witnesses they intend to call at trial, including expert witnesses, and will produce a copy of documents provided to any expert witness in accordance with the deadlines set forth in the Scheduling Order issued in the above-captioned action dated July 15, 2024, and the Maryland Rules.**

**REQUEST NO. 20:** All contracts or agreements entered into between any parties concerning, affecting, or as a precursor to the events referred to in the complaint.

**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 as to time; is vague and ambiguous,

particularly as to the term “parties” and the language “precursory to the events,” and as to the subject matter of the Request generally; is unduly burdensome; 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.

Based on these objections, **the WM Defendants state that they will produce** a copy of the contract for waste disposal services at or around the location of the Incident, which was in effect on October 16, 2017, which the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 21:** All documents concerning any release, settlement, or other agreement, formal or informal, pursuant to which the liability of any person or any entity for damage arising out of the occurrence which is the subject matter of this lawsuit has been limited, reduced, or released in any manner. This request includes all agreements by one party or person to indemnify another party or person for claims asserted in this litigation.

**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; 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, work product doctrine, and/or settlement privilege. 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 there are no documents responsive to this Request in their possession, custody, or control.

**REQUEST NO. 22:** All documents concerning payments, gifts, services, or any other tangible or non-tangible consideration between the parties since January 2016.

**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 is overbroad; is vague and ambiguous, particularly as to the terms “payments,” “gifts,” “other tangible or non-tangible consideration,” and “parties,” 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 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 documents requested are not being produced.



**REQUEST NO. 23:** All insurance policies under which a person carrying on an insurance business might be liable to pay to you or on your behalf all or part of the damages sought in this action.

**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 overbroad; is vague and ambiguous; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 5.

**REQUEST NO. 24:** All documents received from or provided to any other party to this action or received from any third-party since the filing of the Complaint, whether provided informally or in response to a formal request.

**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 overbroad; is vague and ambiguous as to the subject of the request; is duplicative; 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, see the WM Defendants' Response to Request for Production No. 8.**

**REQUEST NO. 25:** All documents referred to in the Complaint and other pleadings, as the word "pleadings" is defined in Maryland.

**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 overbroad; is duplicative, 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.

Subject to and without waiving these objections, **the WM Defendants state that they will produce** non-privileged documents and communications referenced in the Complaint and other pleadings that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry.**

**REQUEST NO. 26:** All documents (including but not limited to personnel records, human resources data, background information, disciplinary actions, performance data, metrics, etc.) describing, involving, or prepared with the input of Adam Tsottles or Roy Palmer from the inception of their affiliation with Waste Management to the present.

**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 “human resources data,” “background information,” “performance data,” “metrics, etc.,” and “affiliation,” 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; seeks personal information; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 27:** All documents and/or contents (including private messages or hidden or restricted content) of any social media accounts under the ownership or control of Tsottles or Palmer between January 2017 and the 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, particularly as to the terms “social media accounts,” “contents,” “private messages,” “hidden or restricted content,” and “under the ownership or control,” 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 personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 28:** All documents regarding communications made by or to Tsottles, Palmer, or Prioleau regarding the events referred to in the complaint, and all subsequent communications by the individuals in contact with them.

**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 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, **the WM Defendants state that they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 29:** The criminal and civil court histories of Tsottles and Palmer, including any criminal complaints filed by them or on their behalf or in relation to any event in which they had any participation, witness, or other involvement (such as supervisory).

**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 as to time; is vague and ambiguous, particularly as to the terms “criminal and civil court histories” and “event,” 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 personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 30:** All inter- and intra-party communications related to the incidents, locations, or persons referred to in the complaint, including, but not limited to: emails, phone logs, recordings, messages, conference room reservations, meeting/calendar entries and invitations.

**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 terms “inter-and intra-party communications,” “incidents,” “locations,” “messages” and “conference room reservations,” 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 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, **the WM Defendants state that they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 31:** All inter- and intra-party communications by other parties concerning or relating to Tsottles, Palmer, or Prioleau from January 2017 to the present, including, but not limited to: emails, phone logs, recordings, messages, conference room reservations, meeting/calendar entries and invitations.

**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 terms “inter-and intra-party communications,” “messages” and “conference room reservations,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is not clear as to the subject of the Request; is duplicative; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 32:** All documents and communications regarding any third party, including the State’s Attorney and corporate or outside counsel, relating to this matter or to any matter disclosed in the response to this Request.

**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; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks the private and personal information of third parties; 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, **the WM Defendants state that they will produce** non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 33:** All documents and recordings (including invoices, contracts, agreements, emails, phone logs, video, audio, and metadata) involving waste collection or operations from 9E33rd from 2016 to the present.

**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; is unduly burdensome; is duplicative; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 34:** All documents regarding the corporate structure of Waste Management of Maryland (WMM), including (but not limited to) charters, articles of incorporation, organizational charts, corporate filings, management structure, and agreements between WMM and all other Waste Management, Inc. (WMI) subsidiaries, or other affiliated entities.

**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; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 35:** All documents concerning Human Resources policies, procedures, standards, guidelines, handbooks, training, or other formal or informal practices concerning employee and/or contractor relations used by WMM.

**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 terms “procedures standards,” “formal or informal practices,” “employee and/or contractor relations,” and “WMM,” 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 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 36:** All documents tending to show WMI’s level of involvement with the operations, management, and/or running of WMM.

**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, particularly as to the terms “WMI,” “involvement,” “operations, management, and/or running” and “WMM,” 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 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, the WM Defendants refer Plaintiff to the Affidavit of Courtney A. Tippy submitted in support of the WM Defendant’s Motion to Dismiss Second Amended Verified Complaint.

**REQUEST NO. 37:** All documents relating to data retention, access control, identity management, and event logging policies and procedures.

**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, particularly as to the terms “data retention,” “access control,” “identity management,” and “event logging,” 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 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 38:** All documents related to DriveCam and other recording systems used to record any event at 9E33rd from 2016 to the present.

**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, particularly as to the terms “recording systems” and “event,” 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 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 39:** All documents related to any and all persons with supervisory, oversight, investigatory, legal, or other functional superiority, whether formal or informal, over Tsottles, Palmer, or Prioleau, including any persons to which documents were or should have been delivered in relation to the events in the complaint.

**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, particularly as to the terms “supervisory oversight,” and “investigatory, legal, or other functional superiority,” 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; seeks private and personal information; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 40:** All documents related to the organizational structure of Waste Management, including formal and informal supervisory, reporting or oversight practices for WMM, WMI, and any affiliated entities, including the full chain of command for all functions (fiscal, risk, IT, HR, or other) from Tsottles, Palmer, and Prioleau to the CEO and President of WMI.

**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, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 41:** All records for the seven (7) days prior to the occurrence, the day of the occurrence, including “supporting documents” such as:

- a. Dispatch records;
- b. Driver call-in records;
- c. Gate record receipts;
- d. Weight/scale tickets;
- e. Fuel billing statements;
- f. Toll receipts;
- g. Delivery receipts;
- h. Over/short and damage reports;
- i. Commercial Vehicle Safety Alliance reports;
- j. Occurrence reports;
- k. Telephone billing statements and records;
- l. Credit card receipts;
- m. Driver and operator reports;
- n. On-board computer reports;
- o. Traffic citations;
- p. And/or other documents directly related to the operation which are retained in connection with business operations.

**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, particularly as to the terms “records,” “Driver call-in records,” “Gate record receipts,” “Over/short



and damage reports,” “Commercial Vehicle Safety Alliance reports,” “Driver and operator reports,” “On-board computer reports,” and “operations,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is compound; 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, the WM Defendants state that they will produce non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**Regarding Adam Tsottles:**

**REQUEST NO. 42:** All documents related to the organizational structure of Waste Management, including formal and informal supervisory, reporting or oversight practices for WMM, WMI, and any affiliated entities, including the full chain of command for all functions (fiscal, risk, IT, HR, or other) from Tsottles, Palmer, and Prioleau to the CEO and President of WMI.

**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, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; 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, see the WM Defendants’ Response to Request for Production No. 40.**

**REQUEST NO. 43:** The employment application and any notes or documentation regarding his interview for employment.

**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, particularly as to the term “notes,” 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; and seeks personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 44:** The entire qualification file or any file regarding any investigation into the qualifications before he was hired or retained.

**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 as to time; is vague and ambiguous, particularly as to the terms “qualification file” and “investigation,” 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 personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 45:** The record secured by this WM at any time after he was hired.

**RESPONSE NO. 45:** 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 “record,” 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 personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 46:** Any documents regarding his employment history.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 47:** Documentation regarding any contact with any prior employers before hiring him.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and is duplicative. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 48:** All medical documentation in your possession regarding his health, including but not limited to any physicals, drug testing, vision testing, etc. or physical condition at any time while affiliated with WM.

**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; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 49:** Any and all documents regarding any safety training or tests taken.

**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; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 50:** The results of any safety training or tests taken.

**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; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 51:** Any and all documents regarding any reprimands, criticisms, or complaints involving him at any time since 2016.

**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; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 52:** His entire drug and alcohol file including, but not limited to, pre-employment, post-occurrence, random, reasonable suspicion and return to duty drug and alcohol testing results.

**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 terms “drug and alcohol file” and “return to duty,” 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 private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 53:** Any and all payroll and benefit records.

**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; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 54:** His entire safety, performance, HR, personnel, or other files.

**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; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 55:** Any and all records of health insurance claims, disability claims, sickness or doctors' excuses or the entire medical records chart for three (3) years prior to the occurrence.

**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; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 56:** All logs - official or unofficial -for six (6) months prior and since.

**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, particularly as to the term “logs”; 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.

Based on these objections, the WM Defendants state that the Request is too broad and ambiguous to enable a response and, therefore, the documents responsive to this Request (if any) are not being produced.

**REQUEST NO. 57:** Any and all state safety audits concerning him.

**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; 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.

Based on these objections, the documents requested are not being produced.

**REQUEST NO. 58:** Any and all occurrence reports he filed from 2016 to the present.

**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, particularly as to the term “occurrence reports,” 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 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 they will produce non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 59:** Any and all cellular and telephone records, including personal bills, for the day of the occurrence and seven (7) days prior and seven (7) days after.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 60:** Any and all inspection or incident reports filed for the year of the occurrence and three (3) years prior.

**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, particularly as to the term “inspection” and “incident reports,” 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 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, the WM Defendants state that they will produce non-privileged documents and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**REQUEST NO. 61:** Any documents in your possession regarding any insurance coverage.

**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 “insurance coverage” information being sought; 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, *see* the WM Defendants' Response to Request for Production No. 5.

**REQUEST NO. 62:** Produce any other file or documents regarding the Defendant not previously requested above.

**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 as to time; is vague and ambiguous; 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.

Based on these objections, the WM Defendants state that the Request is too broad and ambiguous to enable a response and, therefore, the documents requested are not being produced.

**Regarding Adam Tsottles:**

**REQUEST NO. 63:** All documents related to the organizational structure of Waste Management, including formal and informal supervisory, reporting or oversight practices for WMM, WMI, and any affiliated entities, including the full chain of command for all functions (fiscal, risk, IT, HR, or other) from Tsottles, Palmer, and Prioleau to the CEO and President of



WML.

**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 as to time; is vague and ambiguous, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; 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, *see* the WM Defendants’ Response to Request for Production No. 40.

**REQUEST NO. 64:** The employment application and any notes or documentation regarding his interview for employment.

**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 overbroad as to time; is vague and ambiguous, particularly as to the term “notes,” which is not defined and susceptible to multiple interpretations; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. 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, *see* the WM Defendants’ Response to Request for Production No. 43.**

**REQUEST NO. 65:** The entire qualification file or any file regarding any investigation into the qualifications before he was hired or retained.

**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 is overbroad as to time; is vague and ambiguous, particularly as to the terms “qualification file” and “investigation,” which are not defined and susceptible to multiple interpretations; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. 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, *see* the WM Defendants’ Response to Request for Production No. 44.

**REQUEST NO. 66:** The record secured by this WM at any time after he was hired.

**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 is overbroad as to time; is vague and ambiguous, particularly as to the term “record,” 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 personal information. 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, *see* the WM Defendants' Response to Request for Production No. 45.

**REQUEST NO. 67:** Any documents regarding his employment history.

**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 is overbroad as to time; is vague and ambiguous; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. 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, *see* the WM Defendants' Response to Request for Production No. 46.

**REQUEST NO. 68:** Documentation regarding any contact with any prior employers before hiring him.

**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 overbroad as to time; is vague and ambiguous; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and is duplicative. 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, see the WM Defendants' Response to Request for Production No. 47.**

**REQUEST NO. 69:** All medical documentation in your possession regarding his health, including but not limited to any physicals, drug testing, vision testing, etc. or physical condition at any time while affiliated with WM.

**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 overbroad as to time; is vague and ambiguous; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is duplicative; and seeks private and personal information. 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, *see* the WM Defendants' Response to Request for Production No. 48.**

**REQUEST NO. 70:** Any and all documents regarding any safety training or tests taken.

**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 overbroad as to time; is vague and ambiguous; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 49.**

**REQUEST NO. 71:** The results of any safety training or tests taken.

**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 overbroad as to time; is vague and ambiguous; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 50.

**REQUEST NO. 72:** Any and all documents regarding any reprimands, criticisms, or complaints involving him at any time since 2016.

**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 overbroad; is vague and ambiguous; is duplicative; 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, see the WM Defendants' Response to Request for Production No. 51.**

**REQUEST NO. 73:** His entire drug and alcohol file including, but not limited to, preemployment, post-occurrence, random, reasonable suspicion and return to duty drug and alcohol testing results.

**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 overbroad as to time; is vague and ambiguous, particularly as to the terms “drug and alcohol file” and “return to duty,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; seeks information



that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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, see the WM Defendants' Response to Request for Production No. 52.**

**REQUEST NO. 74:** Any and all payroll and benefit records.

**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 is overbroad as to time; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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, see the WM Defendants' Response to Request for Production No. 53.**

**REQUEST NO. 75:** His entire safety, performance, HR, personnel, or other files.

**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 is overbroad as to time; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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, see the WM Defendants' Response to Request for Production No. 54.**

**REQUEST NO. 76:** Any and all records of health insurance claims, disability claims, sickness or doctors' excuses or the entire medical records chart for three (3) years prior to the occurrence.

**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 is overbroad as to time; is vague and ambiguous; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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, *see* the WM Defendants' Response to Request for Production No. 55.**

**REQUEST NO. 77:** All logs - official or unofficial -for six (6) months prior and since.

**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 overbroad as to time; is vague and ambiguous, particularly as to the term "logs"; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 56.

**REQUEST NO. 78:** Any and all state safety audits concerning him.

**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; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 57.

**REQUEST NO. 79:** Any and all occurrence reports he filed from 2016 to the present.

**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, particularly as to the term “occurrence reports,” which is not defined and susceptible to multiple interpretations; is duplicative; 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, *see* the WM Defendants’ Response to Request for Production No. 58.

**REQUEST NO. 80:** Any and all cellular and telephone records, including personal bills, for the day of the occurrence and seven (7) days prior and seven (7) days after.

**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; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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, see the WM Defendants' Response to Request for Production No. 59.**

**REQUEST NO. 81:** Any and all inspection or incident reports filed for the year of the occurrence and three (3) years prior.

**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, particularly as to the term “inspection” and “incident reports,” which are not defined and susceptible to multiple interpretations; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 60.

**REQUEST NO. 82:** Any documents in your possession regarding any insurance coverage.

**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, particularly as to the "insurance coverage" information being sought; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 5.

**REQUEST NO. 83:** Produce any other file or documents regarding the Defendant not previously requested above.

**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; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 62.

**REQUEST NO. 84:** A copy of his driver's license.

**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 ground that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 85:** Documents regarding the completion, attempts or non-completion of any driving programs he attended or was scheduled to attend.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. 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.

**Based on these objections, the documents requested are not being produced.**

### **Documents Relative to the Vehicle Involved**

**REQUEST NO. 86:** Any and all DOT and State inspections of the vehicle involved in the occurrence for the year of the occurrence and one (i) year prior.

**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; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 87:** Produce copies of any and all satellite communications and e-mail for the day of the occurrence and seven (7) days prior, as well as all recorded ECM data with reference to all data available, including:

- a. trip distance;
- b. total vehicle driving time;
- c. load factor;
- d. vehicle speed limit;
- e. maximum vehicle speed recorded;
- f. number of hard brake incidents;
- g. current engine speed (rpm);

- h. maximum and minimum cruise speed limits;
- i. total vehicle driving distance;
- j. fuel consumption (gal./hr.);
- k. idle time;
- l. engine governed speed;
- m. maximum engine speed recorded;
- n. current throttle position;
- o. brake switch status (on/off);
- p. odometer;
- q. trip driving time;
- r. overall fuel economy (MPG);
- s. average driving speed;
- t. number of engine overspeeds;
- u. number of vehicle overspeeds;
- v. current vehicle speed (MPH);
- w. clutch switch status (on/off); and
- x. clock.

**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; is vague and ambiguous; is unduly burdensome; is compound; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 88:** All documents relating to information recorded by any type of Global Positioning System, such as Qualcomm, Highway Master, XATA or other such systems, regarding all vehicles driven by Palmer for the period January 15, 2009 to September 15, 2009.

**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 as to time; is vague and ambiguous; is unduly burdensome; 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 89:** All documents relating to information recorded by any type of Video Recording System, such as DriveCam, Safety Vision, or other such systems, regarding all vehicles driven by Palmer for the period January 15, 2009 to September 15, 2009.

**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 terms “Video Recording System” and “vehicles,” 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 the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 90:** All documents relating to information recorded by any type of Radar Collision Warning System, such as VORAD or other such systems, regarding all vehicles driven by Palmer for the period January 15, 2009 to September 15, 2009.

**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 terms “Radar Collision Warning System” and “vehicles,” 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 the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 91:** All documents relating to information recorded by any type of Accelerometer Recording System, such as Independent Witness, Inc.’s Witness or other such systems, regarding all vehicles driven by Palmer for the period January 15, 2009 to September 15, 2009.

**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 as to time; is vague and ambiguous, particularly as to the terms “Accelerometer Recording System” and “vehicles,” 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 the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 92:** Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from the Electronic Control Module (ECM) for any vehicle involved in the occurrence.

**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 as to time; is vague and ambiguous, particularly as to the terms “data,” “Electronic Control Module,” and “vehicle,” 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 the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 93:** Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from the Airbag Control Module (ACM), Powertrain Control Module (PCM), and Roll Over Sensor (ROS) for any vehicle involved in the occurrence.

**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 as to time; is vague and ambiguous, particularly as to the terms “data,” “Airbag Control Module,” “Powertrain Control Module,” “Roll Over Sensor,” and “vehicle,” 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 the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 94:** Copies of any and all printouts and copies of any and all electronic files of data imaged (i.e., downloaded) from any and all Event Data Recorded (EDR) relating to any of the vehicles involved in the occurrence. An EDR means a device or function in a vehicle or remote of the vehicle that records any vehicle or occupant-based data just prior to or during a crash, such that the data can be retrieved after the crash.

**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 “vehicles”; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks the personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 95:** The Permanent Unit File or its equivalent including, but not limited to, records relating to the repairs, maintenance, and costs for the vehicle involved in the occurrence.

**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 as to time; is vague and ambiguous; is

unduly burdensome; 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.

**Based on these objections, the documents requested are not being produced.**

### **Expert Witness Documentation**

**REQUEST NO. 96:** All notes, correspondence, bills, invoices, diagrams, photographs, x-rays or other documents prepared or reviewed by each person whom you expect to call as an expert witness at trial.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; 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, the WM Defendants state that they will identify any expert witnesses they intend to call at trial and will produce a copy of any documents provided to any expert witness, any expert witness's CV, a list of prior cases in which the expert provided testimony, and any final report prepared by any expert in accordance with the deadlines set forth in the Scheduling Order issued in the above-captioned action dated July 15, 2024 and the Maryland Rules.

**REQUEST NO. 97:** All written reports of each person whom you expect to call as an expert witness at trial, including any drafts.

**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 premature 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, see the WM Defendants' response to Request No. 96.

**REQUEST NO. 98:** All documents upon which any expert witness you intend to call at trial relied to form an opinion.

**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 seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; 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, *see* the WM Defendants' response to Request No. 96.

**REQUEST NO. 99:** All invoices generated by expert witnesses for performing all expert witness services to Defendants, including but not limited to, the fees for the medical examination, the records review, the pretrial preparation, any telephone conference, any trial testimony anticipated and any other fee paid by the Defendants for expert fees.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; 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, see the WM Defendants' response to Request No. 96.**

**REQUEST NO. 100:** Any and all correspondence exchanged between counsel for this Defendant and any expert.

**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; seeks information that is neither relevant

nor likely to lead to the discovery of admissible evidence; is premature; 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, *see* the WM Defendants' response to Request No. 96.

**REQUEST NO. 101:** Any expert's current fee schedule.

**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 seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and is premature. 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, *see* the WM Defendants' response to Request No. 96.

**REQUEST NO. 102:** The most recent resume or curriculum vitae of each expert whom you expect to call as an expert witness at trial.

**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 seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and is premature. 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, *see* the WM Defendants' response to Request No. 96.

**REQUEST NO. 103:** Any list kept by any expert of that expert's testimony by way of deposition or trial testimony.

**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 seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and is premature. 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, see the WM Defendants' response to Request No. 96.**

**REQUEST NO. 104:** Any and all 1099 forms for any expert that demonstrates the source(s) of payment(s) to the expert, or the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; is duplicative; and seeks the private financial and/or personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 105:** Any and all Quickbooks or other similar accounting tools used to document sources of payments made to the experts, or the expert's practice, from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; is duplicative; and seeks the private financial and/or personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

**REQUEST NO. 106:** Any and all tax returns for any expert that demonstrates the source(s) of payment(s) to the doctor from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of

any defense law firm or insurance company. All other personal information is NOT requested and may be redacted.

**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; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; is duplicative; and seeks the private financial and/or personal information of third parties. 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.

**Based on these objections, the documents requested are not being produced.**

#### **Contracts and Leases**

**REQUEST NO. 107:** Any lease agreements and/or contracts that were in effect at the time of the occurrence between this Defendant and any other Defendant or entity regarding the scope and use of the vehicle involved in the occurrence.

**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; is duplicative; 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, **the WM Defendants state that they will produce** a copy of any contract for waste disposal services at or around the Incident, which was in effect on October 16, 2017, which the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 108:** Any contracts between this Defendant and any other Defendant or entity regarding indemnification or contribution for claims arising out of the occurrence.

**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; is

duplicative; 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, **the WM Defendants state that they will produce** a copy of any contract for waste disposal services at or around the Incident, which was in effect on October 16, 2017, which the WM Defendants are able to locate **after a diligent search and reasonable inquiry**.

**REQUEST NO. 109:** Any releases, Mary Carter agreements, or any other documents which serve to limit, reduce or modify your potential liability in this matter or your potential joint and several share of any judgment that may be entered in this matter.

**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; 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, the WM Defendants state that they do not have any documents responsive to this Request in their possession, custody, or control.

**REQUEST NO. 110:** Any documents regarding the existence of insurance coverage for the occurrence, any reservation of rights, or any other documents regarding any diminution or modification of any insurance coverage that may potentially cover any judgment entered as a result of the occurrence.

**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; is vague and ambiguous; is duplicative; 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, *see* the WM Defendants' Response to Request for Production No. 5.

Respectfully submitted,

/s/ Geoffrey M. Gamble  
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*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 Production of Documents was served, through the MDEC system, on the following persons entitled to such service:

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

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San Antonio, TX 78288

/s/ Geoffrey M. Gamble  
Geoffrey M. Gamble