

# EXHIBIT 7

REPLY TO WM DEFENDANTS' DOCUMENT RESPONSES

SERVED AUGUST 31<sup>ST</sup>, 2024

## WM DEFENDANTS' DOCUMENT RESPONSES - GENERIC OBJECTIONS

[1] = "The WM Defendants incorporate their General Objections." [110 items]

[2] = "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." [110 items]

[3] = "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. " [110 items]

[4]= "The WM Defendants further object to this Request on the grounds that it is overbroad" [104 items]

[4.1] = "as to time" [77 items]

[4.2] = "vague and ambiguous" [94 items] (94)

[4.3] = "is unduly burdensome" [160 items] (110 + 50 duplicates as part of 4.7)

[4.4] = "seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence" [109 items]<sup>1</sup>

[4.5] = "seeks information that is protected by the attorney-client privilege" [32 items]

[4.6] = "work product doctrine" [32 items]

[4.7] = "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" [110 items]

[4.8] = "seeks information that is equally available to Plaintiff" [items 7, 25]

[4.9] = "is duplicative" [45 items]

[4.10] = "seeks trade secret and/or personal information" [1 item]

[4.11] = "[not clear/ambiguous] as to the subject [matter] of the Request" [10 items]

[4.12] = "seeks personal information" [13 items]

[4.13] = "premature" [12 items]

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<sup>1</sup> Evidently the only request the WM Defendants think *will* lead to discoverable evidence is No. 97: "All written reports of each person whom you expect to call as an expert witness at trial, including any drafts."

## GENERIC RESPONSES

[R1] = "Subject to and without waiving these objections" [65 items] (65)

[R2] = "Based on these objections" [45 items] (45)

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## PLAINTIFF'S REPLY - DEFINITIONS

All terms used refer to their meanings in ordinary vernacular or dictionary use; business or trade use; and/or as defined or analogous to terms defined or referred to in the complaint.

For quick reference:

WM, WMI = Waste Management, Inc. and/or its subsidiaries, assigns, affiliates, controlled entities, held entities, subordinates, employees, agents, contractors, minions, or any other person or organization the "WM" corporate umbrella extends.

WMM, WMMD = Waste Management of Maryland, Inc., and/or its subsidiaries, assigns, affiliates, controlled entities, held entities, subordinates, employees, agents, contractors, minions, or any other person or organization its corporate umbrella extends.

"9E33rd" is used as defined in the complaint.

The terms "inter-and intra-party communications", "incidents", "locations", "messages", and "conference room reservations" are used in their ordinary meaning, and refer to any communications regarding the matters referred to in the complaint within or between parties in this action.

The terms "data retention", "access control", "identity management", and "event logging" are meant in their ordinary meaning, including (but not limited to) their conventional meanings in IT and eDiscovery.

The term "event" refers to the matter(s) in the complaint.

The term "occurrence report" refers to any incident or unusual event for which he wrote a report, including for the matter contained in the complaint.

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" are used in their ordinary and/or most common industry meanings.

The terms "video recording system", "Radar Collision Warning System", "data", "Airbag Control Module", "Powertrain Control Module", "Roll Over Sensor", "Electronic Control Module", and "Accelerometer Recording System" are used in their ordinary meaning.

The terms "supervisory oversight" and "investigatory, legal, or other functional superiority" are used in their ordinary meaning.

The terms "vehicle(s)", "scene", "occurrence", "any other matter", "video surveillance", "imaging", "standards in the industry", "safety manuals", "driver or operator manuals", "parties", "precursor[y] to the events", "payments", "gifts", "other tangible or non-tangible consideration", "human resources data", "background information", "performance data", "metrics", "affiliation", "social media accounts", "contents", "private messages", "hidden or restricted content", "under the ownership or control", "criminal and civil court histories", "event", "inter-and intra-party communications", "incidents", "locations", "messages", "conference room reservations", "procedures standards", "formal or informal practices", "employee and/or contractor relations", "involvement", "operations, management, and/or running", "notes", and "record" are used in their ordinary meaning.

The terms "recording systems" is used in its ordinary meaning.

The terms "supervisory oversight" and "investigatory, legal, or other functional superiority" are used in their ordinary meaning.

The terms "organizational structure", "formal and informal supervisory, reporting or oversight practices", "affiliated entities", and "functions" are used in their ordinary meaning.

The terms "qualification file" and "investigation" are used in their ordinary meaning.

The terms "drug and alcohol file" and "return to duty" are used in their ordinary meaning.

The terms "inspection" and "incident report" are used in their ordinary meaning.

The term "insurance coverage" refers to its ordinary meaning.

## 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 in the complaint.

RESPONSE NO. 1:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

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.

REPLY NO. 1:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

#### Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

#### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records directly related to that event and is bounded in time by the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.9] [4.4] [4.7].

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.

REPLY NO. 2:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This is the second question in the first set of responses. It cannot be duplicative. Further, Request 1 relates to business records of the event, while Request 2 relates to business records (statements, etc.) that resulted from the event. Further, this objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 3:

OBJECTIONS: [1] [2] [4] [4.1] [4.11] [4.3] [4.4] [4.7].

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

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.

REPLY NO. 3:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The "scene" and "vehicle(s)" referred to in the complaint refer to the matters referred to in the complaint, and/or to their ordinary meanings.
- "Any photographs taken regarding [...] any other matter relevant to the occurrence" refers to any photographs taken in connection or as a result of the subject matter of the complaint.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.



[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 4:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "video surveillance" and "imaging," which are not defined and susceptible to multiple interpretations

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.

REPLY NO. 4:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “video surveillance” and “imaging” refer to their ordinary meanings.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.7].

is vague and ambiguous as to the terms “vehicle” and “occurrence”

The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 5:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

Specific Replies:

- The term “vehicle” as defined in the complaint.
- The term “occurrence” means the incident(s) referred to in the complaint.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.5] [4.6] [4.7].

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.

REPLY NO. 6:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.3] [4.4] and [4.8] [4.7].

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.

REPLY NO. 7:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.8] All information sought is intended to lead to discoverable evidence, invalidating this objection.

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

RESPONSE NO. 8:

OBJECTIONS: [1] [2] [4] [4.1] [4.11] [4.4] [4.7].

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

REPLY NO. 8:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.11] Please clarify what is meant by the "subject of the Request".

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:

OBJECTIONS: [1] [2] [4] [4.3] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous as to the language "standards in the industry"

The WM Defendants refer Plaintiff to its motion to dismiss briefing in this action, but that it otherwise will not produce the documents requested.

REPLY NO. 9:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- The term “standards in the industry” refers to the industry or industries the defendants are engaged in, in their ordinary use.
- Failure to produce because of the wording “standards in the industry” is evasive and un-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not “describe the nature of the documents, electronically stored information, communications, or things not produced” as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.8] All information sought is intended to lead to discoverable evidence, invalidating this objection.

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



RESPONSE NO. 10:

OBJECTIONS: [1] [2] [4] [4.1] [4.11] [4.3] [4.9] [4.4] [4.7].

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

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.

REPLY NO. 10:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The "scene" and "vehicle(s)" mean those referred to in the complaint.
- "Any recordings taken regarding [...] any other matter relevant to the occurrence" refers to its ordinary meaning with regard to the matter contained in the complaint.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.11] Please clarify what is meant by the "subject of the Request".

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

RESPONSE NO. 11:

OBJECTIONS: [1] [2] [4] [4.1] [4.11] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "9E33rd," "video surveillance," and "imaging," which are not defined and susceptible to multiple interpretations and seeks personal information of third parties.

The WM Defendants state that there are no documents responsive to this Request in their possession, custody, or control.

REPLY NO. 11:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- "9E33rd" is used as defined in the complaint.
- The terms "video surveillance" and "imaging" are used in their ordinary meaning.
- WM Defendants have admitted that the vehicles that service 9E33rd have DriveCam systems that image the areas around and in the vehicles, including while servicing 9E33rd.

- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- Personal information is not privileged under the Maryland Rules.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.11] Please clarify what is meant by the "subject of the Request".

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

RESPONSE NO. 12:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7]

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 and seeks trade secret and/or personal information..

The documents requested are not being produced.

REPLY NO. 12:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "safety manuals" and "driver or operator manuals" refer to any and all safety training used by or available to Tsottles, Palmer, and/or other employees of Waste Management, Inc.; Waste Management of Maryland, Inc.; or any affiliates, subsidiaries, or partners in Maryland, and associated documents, manuals, presentations, or other physical or digital media used to assist in those trainings.
- The objection that the Request is so vague and ambiguous that the defendants cannot reasonably be expected to produce the documents requested is incompatible with the objection that the documents requested are subject to trade secrets and/or contain privileged information, which by definition apply only to specific information or documents.
- The requirements of Rule 2-402(e) are not met for a claim of privilege.
- The WM Defendants have not applied for a protective order for any sensitive documents, and may not refuse to produce documents as a result of their failure to do so.

- Failure to produce is evasive and un-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 13:

OBJECTIONS: [1] [2] [4] [4.3] [4.9] [4.4] [4.7].

is vague and ambiguous as to the term "occurrence"

see the WM Defendants' Response to Request for Production No. 5. The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 13:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

### Specific Replies:

- The term “occurrence” refers to the matter contained in the complaint.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

see the WM Defendants' Response to Request for Production No. 6. 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.

REPLY NO. 14:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.3] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 7. 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.

REPLY NO. 15:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.



Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 16:

OBJECTIONS: [1] [2] [4] [4.1] [4.11] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 8. The WM Defendants state that no such documents currently exist, but that they will supplement their response to this Request as appropriate.

REPLY NO. 16:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

Specific Replies:

- N/A

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.11] Please clarify what is meant by the "subject of the Request".

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.11] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

see the WM Defendants' Response to Request for Production No. 6. 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.

REPLY NO. 17:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.11] Please clarify what is meant by the "subject of the Request".

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:

OBJECTIONS: [1] [2] [4] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous, particularly as to the term "occurrence," which is undefined and susceptible to multiple interpretations

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.

REPLY NO. 18:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term "occurrence" refers to the matter contained in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.11] [4.3] [4.4] [4.13] [4.5] [4.6] [4.7].

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.

REPLY NO. 19:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.11] Please clarify what is meant by the "subject of the Request".

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4] [4.1] and [4.11] generally [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the term "parties" and the language "precursory to the events,"

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.

REPLY NO. 20:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “parties” refers to any entity entering into a contract or agreement that affected or concerned the events in the complaint.
- The language “precursor to the events” means any contract or agreement that could, did, or tended to precipitate the events referred to in the complaint.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.11] Please clarify what is meant by the “subject of the Request”.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.5], [4.6], [4.7]

settlement privilege

The WM Defendants state that there are no documents responsive to this Request in their possession, custody, or control.

REPLY NO. 21:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- There is no privilege where there are no documents. As you are claiming privilege, it must be presumed that there are, in fact, such documents in the WM Defendants' possession, custody, or control, and this answer is evasive and un-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.3] [4.4] [4.7].

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

The documents requested are not being produced.

REPLY NO. 22:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term "parties" refers to any entity entering into a contract or agreement that affected or concerned the events in the complaint.
- The terms "gifts", "payments", and "other tangible or non-tangible consideration" refers to the ordinary dictionary definitions of the words.
- This answer provides no information and only boilerplate and non-specific objections.

- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 5.

The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 23:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

Specific Replies:

- N/A

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.11] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 8.

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

REPLY NO. 24:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

Specific Replies:

- N/A

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.11] Please clarify what is meant by the "subject of the Request".

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

RESPONSE NO. 25:

OBJECTIONS: [1] [2] [4] [4.9], [4.4] [4.5] [4.6] [4.8] [4.7].

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.

REPLY NO. 25:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.8] All information sought is intended to lead to discoverable evidence, invalidating this objection.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

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; and seeks personal information;

The documents requested are not being produced.

REPLY NO. 26:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "human resources data", "background information", "performance data", "metrics, etc.", and "affiliation" are used in their meanings under ordinary business practices.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.



[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

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; and seeks personal information.

The documents requested are not being produced.

REPLY NO. 27:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- The terms “social media accounts,” “contents,” “private messages,” “hidden or restricted content,” and “under the ownership or control,” are used in their ordinary meanings.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

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.

REPLY NO. 28:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.7].

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; and seeks personal information.

The documents requested are not being produced.

REPLY NO. 29:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "criminal and civil court histories" means any interactions Tsottles and Palmer have had with the criminal or civil courts.
- The term "event" is used in its ordinary meaning.

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

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. 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.

REPLY NO. 30:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “inter-and intra-party communications”, “incidents”, “locations”, “messages”, and “conference room reservations” are used in their ordinary meaning, and refer to any communications regarding the matters referred to in the complaint within or between parties in this action.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.11] [4.9] [4.4] [4.5] [4.6] [4.7].

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

The documents requested are not being produced.

REPLY NO. 31:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “inter-and intra-party communications”, “incidents”, “locations”, “messages”, and “conference room reservations” are used in their ordinary meaning, and refer to any communications regarding the matters referred to in the complaint within or between parties in this action.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

#### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not “describe the nature of the documents, electronically stored information, communications, or things not produced” as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.



[4.11] Please clarify what is meant by the "subject of the Request".

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

seeks the private and personal information of third parties

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.

REPLY NO. 32:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules.
- The Request is considered limited to any and all information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- The objection does not provide any information that is not private or in the possession or control of third parties, and is evasive and un-responsive.
- This answer provides no information and only boilerplate and non-specific objections.

- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

The documents requested are not being produced.

REPLY NO. 33:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting.

And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 34:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

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

The documents requested are not being produced.

REPLY NO. 35:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "procedures standards", "formal or informal practices", "employee and/or contractor relations" are used in their ordinary meaning.
- "WMM" refers to Waste Management of Maryland, Inc., as defined above and in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.5] [4.6] [4.7].

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

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.

REPLY NO. 36:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "involvement" and "operations, management, and/or running" are employed in their ordinary meanings.
- "WMI" and "WMM" refer to Waste Management, Inc. and Waste Management of Maryland, Inc., as defined above and in the complaint.
- Referring to a single document produced earlier is not "all documents", nor does it satisfy the requirements of production.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 37:

OBJECTIONS: [1] [2] [4] [4.1], [4.3] [4.4] [4.5] [4.6] [4.7].

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

The documents requested are not being produced.

REPLY NO. 37:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "data retention", "access control", "identity management", and "event logging" are meant in their ordinary meaning, including (but not limited to) their conventional meanings in IT and eDiscovery.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.



[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous, particularly as to the terms "recording systems" and "event," which are not defined and susceptible to multiple interpretations

The documents requested are not being produced.

REPLY NO. 38:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- The terms "recording systems" is used in its ordinary meaning.
- The term "event" refers to the matter(s) in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.5] [4.6] [4.7].

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; and seeks private and personal information;

The documents requested are not being produced.

REPLY NO. 39:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “supervisory oversight” and “investigatory, legal, or other functional superiority” are used in their ordinary meaning.
- This answer provides no information and only boilerplate and non-specific objections.
- Personal information is not privileged under the Maryland Rules.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

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

The documents requested are not being produced.

REPLY NO. 40:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “organizational structure”, “formal and informal supervisory, reporting or oversight practices”, “affiliated entities”, and “functions” are used in their ordinary meaning.
- “Waste Management”, “WMI”, and “WMM” refer to Waste Management, Waste Management, Inc. and Waste Management of Maryland, Inc., as defined above and in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not “describe the nature of the documents, electronically stored information, communications, or things not produced” as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is compound, 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

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.

REPLY NO. 41:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This Request is not for admission; most document requests are compound, and this objection is spurious.
- 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" are used in their ordinary and/or most common industry meanings.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[3] This is not an objection.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.9] [4.4] [4.7].

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

see the WM Defendants' Response to Request for Production No. 40.

The documents requested are not being produced.

REPLY NO. 42:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "organizational structure", "formal and informal supervisory, reporting or oversight practices", "affiliated entities", and "functions" are used in their ordinary meaning.



- “Waste Management”, “WMI”, and “WMM” refer to Waste Management, Waste Management, Inc. and Waste Management of Maryland, Inc., as defined above and in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 43:

OBJECTIONS: [1] [2] [4] [4.1] ; and [4.4] [4.7].

is vague and ambiguous, particularly as to the term "notes," which is not defined and susceptible to multiple interpretations; and seeks personal information.

The documents requested are not being produced.

REPLY NO. 43:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term "notes" is used in its ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "qualification file" and "investigation," which are not defined and susceptible to multiple interpretations; and seeks personal information.

The documents requested are not being produced.

REPLY NO. 44:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "qualification file" and "investigation" are used in their ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.

- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 45:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.9] [4.7].

is vague and ambiguous, particularly as to the term "record," which is not defined and susceptible to multiple interpretations; and seeks personal information.

The documents requested are not being produced.

REPLY NO. 45:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- The term “notes” is used in its ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 46:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.7].

seeks personal information.

The documents requested are not being produced.

REPLY NO. 46:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 47:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.9] [4.7].

The documents requested are not being produced.

REPLY NO. 47:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

seeks private and personal information

The documents requested are not being produced.

REPLY NO. 48:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.



### Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 49:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] and [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 49:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 50:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] and [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 50:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 51:

OBJECTIONS: [1] [2] [4] [4.2] and [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 51:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

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; and seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 52:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "drug and alcohol file" and "return to duty" are used in their ordinary meaning.

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 53:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 53:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 54:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 54:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.



[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4]; and [4.7].

seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 55:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 56:

OBJECTIONS: [1] [2] [4] [4.1] and [4.4] [4.7].

is vague and ambiguous, particularly as to the term "logs"

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.

REPLY NO. 56:

Withdrawn.

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

RESPONSE NO. 57:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] and [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 57:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 58:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous, particularly as to the term “occurrence reports,” which is not defined and susceptible to multiple interpretations;

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.

REPLY NO. 58:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “occurrence report” refers to any incident or unusual event for which he wrote a report, including for the matter contained in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.7].

seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 59:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.

- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous, particularly as to the term "inspection" and "incident reports," which are not defined and susceptible to multiple interpretations;

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.

REPLY NO. 60:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "inspection" and "incident report" are used in their ordinary meaning.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 61:

OBJECTIONS: [1] [2] [4] [4.1] ; and [4.4] [4.7].

is vague and ambiguous, particularly as to the “insurance coverage” information being sought

see the WM Defendants’ Response to Request for Production No. 5.

The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 61:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “insurance coverage” refers to its ordinary meaning.
- The objection that the Request is so vague and ambiguous that the defendants cannot reasonably be expected to produce the documents requested is incompatible with the objection that the documents do not exist.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.



[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 62:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.5] [4.6] [4.7].

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.

REPLY NO. 62:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

#### Regarding Roy Palmer<sup>2</sup>:

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.

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<sup>2</sup> Due to a clerical error, this was originally "Adam Tsottles". While this was clearly duplicative and obviously referred to Roy Palmer, Plaintiff sent an email correcting the error to WM Defendants' counsel on Thu, 1 Aug 2024 at 14:04.

RESPONSE NO. 63:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.9] [4.4] [4.5] [4.6] [4.7].

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

see the WM Defendants' Response to Request for Production No. 40. The documents requested are not being produced.

REPLY NO. 63:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "organizational structure", "formal and informal supervisory, reporting or oversight practices", "affiliated entities", and "functions" are used in their ordinary meaning.
- "Waste Management", "WMI", and "WMM" refer to Waste Management, Waste Management, Inc. and Waste Management of Maryland, Inc., as defined above and in the complaint.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 64:

OBJECTIONS: [1] [2] [4] [4.1] [4.9] [4.4] [4.7].

is vague and ambiguous, particularly as to the term "notes," which is not defined and susceptible to multiple interpretations; and seeks personal information.

see the WM Defendants' Response to Request for Production No. 43.

The documents requested are not being produced.

REPLY NO. 64:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “notes” is used in its ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1]

is vague and ambiguous, particularly as to the terms “qualification file” and “investigation,” which are not defined and susceptible to multiple interpretations [4.9] [4.4]; and seeks personal information. [4.7].

see the WM Defendants’ Response to Request for Production No. 44. The documents requested are not being produced.

REPLY NO. 65:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “qualification file” and “investigation” are used in their ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 66:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.9] [4.7].

is vague and ambiguous, particularly as to the term "record," which is not defined and susceptible to multiple interpretations; and seeks personal information.

see the WM Defendants' Response to Request for Production No. 45.

The documents requested are not being produced.

REPLY NO. 66:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term "notes" is used in its ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.

- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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

RESPONSE NO. 67:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].  
seeks personal information.



see the WM Defendants' Response to Request for Production No. 46.

The documents requested are not being produced.

REPLY NO. 67:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 68:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.4] [4.9] [4.7].

see the WM Defendants' Response to Request for Production No. 47.

The documents requested are not being produced.

REPLY NO. 68:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.9] [4.7].

and seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 48. The documents requested are not being produced.

REPLY NO. 69:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 70:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 49. The documents requested are not being produced.

REPLY NO. 70:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 71:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 50. The documents requested are not being produced.

REPLY NO. 71:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 72:

OBJECTIONS: [1] [2] [4] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 51.

The documents requested are not being produced.

REPLY NO. 72:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

REQUEST NO. 73: 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. 73:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.9] [4.4] [4.7].

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; and seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 52. The documents requested are not being produced.

REPLY NO. 73:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.



### Specific Replies:

- The terms “drug and alcohol file” and “return to duty” are used in their ordinary meaning.
- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 74:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.9] [4.4] [4.7].

seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 53. The documents requested are not being produced.

REPLY NO. 74:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 75:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.9] [4.4] [4.7].

seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 54. The documents requested are not being produced.

REPLY NO. 75:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].  
seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 55. The documents requested are not being produced.

REPLY NO. 76:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

### Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 77:

OBJECTIONS: [1] [2] [4] [4.1] [4.9] [4.4] [4.7]

is vague and ambiguous, particularly as to the term "logs"

see the WM Defendants' Response to Request for Production No. 56.

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.

REPLY NO. 77:

Withdrawn.

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

RESPONSE NO. 78:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 57.

The documents requested are not being produced.

REPLY NO. 78:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 79:

OBJECTIONS: [1] [2] [4] [4.1] [4.9] [4.4] [4.5] [4.6] [4.7].

is vague and ambiguous, particularly as to the term "occurrence reports," which is not defined and susceptible to multiple interpretations;

see the WM Defendants' Response to Request for Production No. 58. 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.

REPLY NO. 79:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term "occurrence report" refers to any incident or unusual event for which he wrote a report, including for the matter contained in the complaint.

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

seeks private and personal information.

see the WM Defendants' Response to Request for Production No. 59. The documents requested are not being produced.



REPLY NO. 80:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.9] [4.4] [4.5] [4.6] [4.7].

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

REPLY NO. 81:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "inspection" and "incident report" are used in their ordinary meaning.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 82:

OBJECTIONS: [1] [2] [4] [4.1] [4.9] [4.4] [4.7].

is vague and ambiguous, particularly as to the "insurance coverage" information being sought;

see the WM Defendants' Response to Request for Production No. 5.

The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 82:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “insurance coverage” refers to its ordinary meaning.
- The objection that the Request is so vague and ambiguous that the defendants cannot reasonably be expected to produce the documents requested is incompatible with the objection that the documents do not exist.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 83:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.5] [4.6] [4.7].

see the WM Defendants' Response to Request for Production No. 62. 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.

REPLY NO. 83:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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

RESPONSE NO. 84:

OBJECTIONS: [1] [2] [4.4] [4.7]

seeks personal information.

The documents requested are not being produced.

REPLY NO. 84:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.4] [4.7].

seeks private and personal information.

The documents requested are not being produced.

REPLY NO. 85:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules; applies to named parties in the suit; and is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.

- Further, if the personal information were to be considered privileged, the objection does not conform to Rule 2-402(e).
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] and [4.4] [4.7].

The documents requested are not being produced.



REPLY NO. 86:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.3] [4.4] [4.7] and compound  
The documents requested are not being produced.

REPLY NO. 87:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

#### Specific Replies:

- This Request is not for admission; most document requests are compound, and this objection is spurious.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

#### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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 1, 2016 to the present.

RESPONSE NO. 88:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 88:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.

- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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 1, 2016 to the present.

RESPONSE NO. 89:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "Video Recording System" and "vehicles," which are not defined and susceptible to multiple interpretations; and seeks the personal information of third parties.

The documents requested are not being produced.

REPLY NO. 89:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “video recording system” and “vehicle” are used in their ordinary meaning and/or as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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 1, 2016 to the present.

RESPONSE NO. 90:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "Radar Collision Warning System" and "vehicles," which are not defined and susceptible to multiple interpretations and seeks the personal information of third parties.

The documents requested are not being produced.

REPLY NO. 90:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "Radar Collision Warning System" and "vehicle" are used in their ordinary meaning and/or as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.

- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.8] All information sought is intended to lead to discoverable evidence, invalidating this objection.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.10] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.11] Please clarify what is meant by the "subject of the Request".

[4.12] The information sought relates directly to the claims or defenses, or is calculated to lead to discoverable evidence, and personal information about the parties is not excluded from discovery.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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 1, 2016 to the present.

RESPONSE NO. 91:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "Accelerometer Recording System" and "vehicles," which are not defined and susceptible to multiple interpretations; and seeks the personal information of third parties.

The documents requested are not being produced.



REPLY NO. 91:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms “Accelerometer Recording System” and “vehicle” are used in their ordinary meaning and/or as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the terms "data," "Electronic Control Module," and "vehicle," which are not defined and susceptible to multiple interpretations; and seeks the personal information of third parties.

The documents requested are not being produced.

REPLY NO. 92:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "Electronic Control Module" and "vehicle" are used in their ordinary meaning and/or as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.

- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

#### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4];

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; and seeks the personal information of third parties.

The documents requested are not being produced.

REPLY NO. 93:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The terms "data", "Airbag Control Module", "Powertrain Control Module", "Roll Over Sensor", and "vehicle" are used in their ordinary meaning and/or as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.

- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.3] [4.4] [4.7].

is vague and ambiguous, particularly as to the term "vehicles"; and seeks the personal information of third parties.

The documents requested are not being produced.

REPLY NO. 94:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- The term “vehicle” is used in its ordinary meaning and as defined in the complaint.
- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The documents sought describe public spaces where no reasonable expectation of privacy exists.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. (“WMI”) is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not

been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.3] [4.4] [4.7].

The documents requested are not being produced.

REPLY NO. 95:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

#### 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:

OBJECTIONS: [1] [2] [4] [4.2] [4.4] [4.13] [4.5] [4.6] [4.7].

The WM Defendants state that 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.

REPLY NO. 96:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.



Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4.13] [4.5] [4.6] [4.7].

see the WM Defendants' response to Request No. 96.

The WM Defendants state that 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.

REPLY NO. 97:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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

RESPONSE NO. 98:

OBJECTIONS: [1] [2] [4.4] [4.13] [4.5] [4.6] [4.7].

see the WM Defendants' response to Request No. 96.

The WM Defendants state that 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.

REPLY NO. 98:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.13] [4.5] [4.6] [4.7].

see the WM Defendants' response to Request No. 96.

The WM Defendants state that 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.

REPLY NO. 99:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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

RESPONSE NO. 100:

OBJECTIONS: [1] [2] [4] [4.4] [4.13] [4.5] [4.6] [4.7].  
see the WM Defendants' response to Request No. 96.

The WM Defendants state that 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.

REPLY NO. 100:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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

RESPONSE NO. 101:

OBJECTIONS: [1] [2] [4.4] and [4.13] [4.7].

see the WM Defendants' response to Request No. 96.

The WM Defendants state that 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.

REPLY NO. 101:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- The objection does not conform to Rule 2-402(e) for any information considered privileged.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.3] This objection does not specify why it is burdensome nor what makes it unduly so.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.5, 4.6] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.8] All information sought is intended to lead to discoverable evidence, invalidating this objection.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.10] The objection does not "describe the nature of the documents, electronically stored information, communications, or things not produced" as required by Rule 2-402(e) for a claim of privilege and is therefore invalid.

[4.11] Please clarify what is meant by the "subject of the Request".

[4.12] The information sought relates directly to the claims or defenses, or is calculated to lead to discoverable evidence, and personal information about the parties is not excluded from discovery.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4.4] and [4.13] [4.7].

see the WM Defendants' response to Request No. 96. The WM Defendants state that 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.

REPLY NO. 102:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- N/A

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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

RESPONSE NO. 103:

OBJECTIONS: [1] [2] [4.4] and [4.13] [4.7].

see the WM Defendants' response to Request No. 96. The WM Defendants state that 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.

REPLY NO. 103:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production as soon as they are available.

Specific Replies:

- N/A

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the

defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.13] [4.9] [4.7]

seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

REPLY NO. 104:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants or their contractors, sub-contractors, employees, or other paid workers, including expert witnesses.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.

- These documents are expected to be produced as part of rolling production as soon as they are available.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.13] [4.9] [4.7].

seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

REPLY NO. 105:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants or their contractors, sub-contractors, employees, or other paid workers, including expert witnesses.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- These documents are expected to be produced as part of rolling production as soon as they are available.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

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:

OBJECTIONS: [1] [2] [4] [4.4] [4.13] [4.9] [4.7].

seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

REPLY NO. 106:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- Personal information is not privileged under the Maryland Rules.
- Failure to produce any relevant documents the WM Defendants do possess or control is evasive and un-responsive.
- The Request is considered limited to any and all relevant information in the possession of the WM Defendants or their contractors, sub-contractors, employees, or other paid workers, including expert witnesses.
- The Request is directly relevant to the claims and defenses of the parties in this action and reasonably calculated to lead to discoverable evidence.
- The objection does not conform to Rule 2-402(e) for any information considered privileged.
- These documents are expected to be produced as part of rolling production as soon as they are available.
- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

[4.13] It is presumed Defendants will supplement these records on the date of maturity.

#### 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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

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.

REPLY NO. 107:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.



### Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.1] [4.2] [4.9] [4.4] [4.7].

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.

REPLY NO. 108:

The deadline for producing these documents was August 26<sup>th</sup>, 2024 and no documents have been produced.

The response attempts to limit the scope of production to less than what is requested.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

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:

OBJECTIONS: [1] [2] [4] [4.2] and [4.4] [4.7].

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

REPLY NO. 109:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

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:

OBJECTIONS: [1] [2] [4] [4.2] [4.9] [4.4] [4.7].

see the WM Defendants' Response to Request for Production No. 5.

The WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

REPLY NO. 110:

The deadline for producing these documents was August 26th, 2024 and are expected to be produced as part of rolling production if any are found.

### Specific Replies:

- This answer provides no information and only boilerplate and non-specific objections.
- The answer is evasive and non-responsive.

### Replies to General Objections:

[1] General objections are not valid.

[2] This request includes documents that will or are reasonably calculated to lead to discoverable evidence that will provide prima facie evidence that Waste Management, Inc. ("WMI") is subject to either general or specific jurisdiction in Maryland.

[4, 4.1] The request is specific to an event and the records derived from that event, is bounded in time by being after the event. It is not overly broad in scope or time.

[4.2] This objection is vague and ambiguous and provides no detail about what is vague or ambiguous about the request.

[4.4] The information sought relates directly to the events in the complaint and/or defenses raised in the motion to dismiss. Also, because a responsive pleading has not been filed, the scope of discovery has not yet been narrowed due to facts admitted and defenses claimed.

[4.7] The volume of discovery requested is appropriate for the number, type, and severity of the causes of action; the enormity of the damage done to Plaintiff by the defendants; the resources of the defendants; and the disparity in the representation between the Plaintiff and WM Defendants.

[4.9] This objection does not describe what is duplicative, nor why simply pointing to the same document already produced elsewhere would not suffice, rather than objecting. And because NO documents have yet been produced, it CANNOT be duplicative, because there is nothing to duplicate.

# Case # C-02-CV-24-000546 - Matthew O Reilly, et al. vs. Waste Mana

## Envelope Information

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**Envelope Id**

17850700

**Submitted Date**

31/08/2024 11:24 EST

**Submitted User Name**

maryland.tylerhost.net@moreilly.com

## Case Information

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**Location**

Anne Arundel Circuit Court

**Category**

Civil

**Case Type**

Tort - Defamation

**Case Initiation Date**

04/03/2024

**Case #**

C-02-CV-24-000546

## Filings

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**Filing Type**

Serve

**Filing Code**

Service Only

**Filing Description**

Reply to WM Defendants' Response to Request for Documents - includes clarifications and refined definitions as requested.

**Filing Status**

Submitting

## Service Document

File Name	Description	Security	Download
Replies to WM Document Objections.pdf	Service Only		Original File

## eService Details

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Status	Name	Firm	Served	Date Opened
Not Sent	Nicole E. Chammas	Saul Ewing LLP	No	Not Opened
Not Sent	Nicole E. Chammas	Saul Ewing LLP	No	Not Opened
Not Sent	Nicole E. Chammas	Saul Ewing LLP	No	Not Opened
Not Sent	Geoffrey M Gamble	Saul Ewing LLP	No	Not Opened

Subject: Notification of Service for Case: C-02-CV-24-000546, Matthew O Reilly, et al. vs. Waste Management Inc, et al. for filing Service Only, Envelope Number: 17850700  
From: no-reply@efilingmail.tylertech.cloud  
Date: 31/08/2024 11:25  
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Case Number: C-02-CV-24-000546  
Case Style: Matthew O Reilly, et al. vs. Waste Management Inc, et al.  
Envelope Number: 17850700

This is a notification of service for the filing listed. Please click the link below to retrieve the submitted document.

### Filing Details

Case Number C-02-CV-24-000546  
Case Style Matthew O Reilly, et al. vs. Waste Management Inc, et al.  
Date/Time Submitted 8/31/2024 11:24 AM EST  
Filing Type Service Only  
Filing Description Reply to WM Defendants' Response to Request for Documents - includes clarifications and refined definitions as requested.  
Filed By Matthew O'Reilly  
Waste Management Inc:

Nicole Chammas (nicole.chammas@saul.com)

Geoffrey Gamble (geoff.gamble@saul.com)

Adam Tsottles:

Service Contacts

Nicole Chammas (nicole.chammas@saul.com)

Geoffrey Gamble (geoff.gamble@saul.com)

Roy Palmer:

Nicole Chammas (nicole.chammas@saul.com)

Geoffrey Gamble (geoff.gamble@saul.com)

Other Service Contacts not associated with a party on the case:

Linda Ruffner (lruffner@fandpnet.com)

Audrea Coad (acoad@fandpnet.com)

Matthew O'Reilly (maryland.tylerhost.net@moreilly.com)

Tracy Stanforth (tracy.stanforth@saul.com)

Sarah Maier (maier@acklaw.com)

Briana Maine (maine@acklaw.com)

Ellorie Davis (edavis@fandpnet.com)

Judy Peters (jpeters@fandpnet.com)

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