

EXHIBIT 2

WM DEFENDANTS' RESPONSES TO PLAINTIFF'S REQUESTS FOR PRODUCTION OF DOCUMENTS

WM DEFENDANTS' RESPONSES TO PLAINTIFF'S
REQUESTS FOR PRODUCTION OF DOCUMENTS¹

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

RESPONSE NO. 1:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 3:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

¹ Boilerplate general objections with identical wording that were copied and pasted into each response have been filtered out from the original document by using a simple text search-and-replace function in Microsoft Word.

All objections specific to a particular response have been preserved.

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

RESPONSE NO. 4:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 8:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: vague and ambiguous as to the language "standards in the industry"

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

RESPONSE NO. 10:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 11:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 12:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 13:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 16:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: "settlement privilege"

The documents requested are not being produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 25:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 34:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 35:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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

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

RESPONSE NO. 37:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 43:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 45:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 46:

SPECIFIC GROUNDS FOR REFUSAL: seeks personal information.

The documents requested are not being produced.

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

RESPONSE NO. 47:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 48:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information

The documents requested are not being produced.

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

RESPONSE NO. 49:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 50:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 51:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 52:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 53:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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

RESPONSE NO. 54:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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

RESPONSE NO. 55:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

REQUEST NO. 56: WITHDRAWN

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

RESPONSE NO. 57:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 58:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

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:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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

RESPONSE NO. 60:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 61:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 62:

SPECIFIC GROUNDS FOR REFUSAL: too broad and ambiguous to enable a response

The documents requested are not being produced.

Regarding Roy Palmer:

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

RESPONSE NO. 63:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 64:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: vague and ambiguous, particularly as to the terms "qualification file" and "investigation," which are not defined and susceptible to multiple interpretations seeks personal information.

The documents requested are not being produced.

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

RESPONSE NO. 66:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 67:

SPECIFIC GROUNDS FOR REFUSAL: seeks personal information.

The documents requested are not being produced.

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

RESPONSE NO. 68:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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

RESPONSE NO. 70:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 71:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 72:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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

RESPONSE NO. 74:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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

RESPONSE NO. 75:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

REQUEST NO. 77: WITHDRAWN

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

RESPONSE NO. 78:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

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

RESPONSE NO. 79:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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

RESPONSE NO. 82:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 83:

SPECIFIC GROUNDS FOR REFUSAL: too broad and ambiguous to enable a response

The documents requested are not being produced.

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

RESPONSE NO. 84:

SPECIFIC GROUNDS FOR REFUSAL: seeks personal information.

The documents requested are not being produced.

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

RESPONSE NO. 85:

SPECIFIC GROUNDS FOR REFUSAL: seeks private and personal information.

The documents requested are not being produced.

Documents Relative to the Vehicle Involved

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

RESPONSE NO. 86:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

REQUEST NO. 87: Produce copies of any and all satellite communications and e-mail for the day of the occurrence and seven (7) days prior, as well as all recorded ECM data with reference to all data available, including: a. trip distance; b. total vehicle driving time; c. load factor; d. vehicle speed limit; e. maximum vehicle speed recorded; f. number of hard brake incidents; g. current engine speed (rpm); h. maximum and minimum cruise speed limits; i. total vehicle driving distance; j. fuel consumption (gal./hr.); k. idle time; l. engine governed speed; m. maximum engine speed recorded; n. current throttle position; o. brake switch status (on/off); p. odometer; q. trip driving time; r. overall fuel economy (MPG); s. average driving speed; t. number of engine overspeeds; u. number of vehicle overspeeds; v. current vehicle speed (MPH); w. clutch switch status (on/off); and x. clock.

RESPONSE NO. 87:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

REQUEST NO. 88: All documents relating to information recorded by any type of Global Positioning System, such as Qualcomm, Highway Master, XATA or other such systems, regarding all vehicles driven by Palmer for the period January 1, 2016 to the present.

RESPONSE NO. 88:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

REQUEST NO. 89: All documents relating to information recorded by any type of video recording system, such as DriveCam, Safety Vision, or other such systems, regarding all vehicles driven by Palmer for the period January 1, 2016 to the present.

RESPONSE NO. 89:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: 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.

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:

SPECIFIC GROUNDS FOR REFUSAL: vague and ambiguous, particularly as to the term "vehicles"; and seeks the personal information of third parties.

The documents requested are not being produced.

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

RESPONSE NO. 95:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

The documents requested are not being produced.

Expert Witness Documentation

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

RESPONSE NO. 96:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 98:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 100:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 101:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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

RESPONSE NO. 103:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

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

RESPONSE NO. 105:

SPECIFIC GROUNDS FOR REFUSAL: seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

REQUEST NO. 106: Any and all tax returns for any expert that demonstrates the source(s) of payment(s) to the doctor from any insurance company or defense law firm that compensated the doctor for any forensic work performed in the last three years at the request of any defense law firm or insurance company. All other personal information is NOT requested and may be redacted.

RESPONSE NO. 106:

SPECIFIC GROUNDS FOR REFUSAL: seeks the private financial and/or personal information of third parties.

The documents requested are not being produced.

Contracts and Leases

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

RESPONSE NO. 107:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: None, but not produced.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.

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:

SPECIFIC GROUNDS FOR REFUSAL: Responsive documents do not exist.