

EXHIBIT 3

WM DEFENDANTS' RESPONSES TO PLAINTIFF'S REQUESTS FOR ADMISSION

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PLAINTIFF'S REQUESTS FOR ADMISSION¹

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

Admitted only that WMMD's business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

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

Denied.

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

Denied.

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

Denied.

The WM Defendants further object to this Request on the grounds that it is overbroad, particularly as it is unbounded in time, is vague and ambiguous, particularly as to the term "CNN interview," which is not defined and susceptible to multiple interpretations.

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

Denied.

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

Denied.

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. 7: Waste Management of Maryland, Inc. was not a party to the contract for services with 9E33rd.

Admitted only that WMMD was a party to a contract that involved the provision of waste removal services at 3200 St. Paul Street, Baltimore, Maryland, 21218.

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

Denied.

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

Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that WMMD's business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

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

Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted that Plaintiff approached certain of WMMD's customer service employees and Mr. Tsottles regarding WMMD's waste removal services at 3200 St. Paul Street, Baltimore, Maryland 21218 prior to October 16, 2017.

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

Denied.

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

Denied.

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

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

Admitted that Mr. Tsottles was not present for the incident that occurred on October 16, 2017 at 3200 St. Paul Street, Baltimore, Maryland 21218, involving Plaintiff ("Incident").

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

Admitted only that Mr. Tsottles was not present for the Incident.

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

Denied.

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

Admitted only that Mr. Tsottles was not present for the Incident.

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

Admitted that certain of WMMD's employees arrived at or around 3200 St. Paul Street, Baltimore, Maryland, 21218 before 10:00 AM to perform collections on October 16, 2017.

REQUEST NO. 27: Roy Palmer was present.

Admitted that Mr. Palmer was present for the Incident.

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

Admitted only that a WMMD vehicle was present at the Incident.

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

Admitted only that Mr. Palmer was acting within the scope of his employment for WMMD at or around the time of the Incident.

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

RESPONSE NO. 30:

Admitted only that Mr. Palmer drove a WMMD vehicle at or around the time of the Incident.

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

RESPONSE NO. 31:

Admitted only that Mr. Palmer was acting within the scope of his employment for WMMD at or around the time of the Incident.

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

Admitted only that Mr. Palmer was present at the Incident and could see Plaintiff from the driver's seat of the truck.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Admitted only that DriveCam technology included on the WMMD vehicle present at the Incident recorded certain aspects of the Incident.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that WMMD had access to certain recordings taken by WMMD of certain aspects of the Incident.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that certain of WMMD's employees were aware that, as of October 16, 2017 Plaintiff did not have access to certain of the recordings of certain aspects of the Incident taken by WMMD.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that WMMD had access to certain of the recordings of certain aspects of the Incident taken by WMMD.

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

Admitted only that certain of WMMD had access to certain of the recordings of certain aspects of the Incident taken by WMMD.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that certain of WMMD's employees discussed the Incident.

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

Denied.

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

The WM Defendants further object to this Request on the grounds that it[...] seeks information that is protected by the attorney-client privilege and/or work product doctrine.

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

REQUEST NO. 61: Tsottles' actions benefitted WM.

Denied.

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

Denied.

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

Denied.

The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required.

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

Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

The WM Defendants further object to this Request on the grounds that it is overbroad and is vague and ambiguous as to the language "in his own hand".

The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required.

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

Denied, except Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

The WM Defendants further object to this Request on the ground that the Application for Statement for Charges is a written document that speaks for itself and, therefore, no response is required.

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

Denied.

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

Denied.

seeks information that is protected by the attorney-client privilege and/or work product doctrine.

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

Denied, except Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

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

Denied, except Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

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

Denied, except Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017.

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

Admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

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

Admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

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

Admitted only that Mr. Tsottles had access to certain of the recordings of certain aspects of the Incident taken by WMMD on or around the date Mr. Tsottles filed the Application for Statement of Charges.

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

Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

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

Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

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

Admitted only that Mr. Tsottles filed the Application for Statement of Charges on October 17, 2017, which is a written document that speaks for itself.

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

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

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

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

Admitted only that WMMD's business operations included the removal of waste from 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

Admitted only that WMMD's trucks operated at or around 3200 St. Paul Street, Baltimore, Maryland 21218 on or around October 16, 2017.

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

Denied.

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

Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

The WM Defendants state that, after a reasonable inquiry, the information known or readily obtainable is insufficient to enable the WM Defendants to admit or deny this Request and, therefore, the Request is Denied.

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

the WM Defendants state that the Request is too broad and ambiguous to enable a response and, therefore, the Request is Denied.

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

REQUEST NO. 101: Tsottles was present.

Admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 102: Palmer was present.

Admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

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

Denied.

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

Denied.

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

Admitted only that a cell phone recording of certain aspects of the Incident was provided to the prosecutor in connection with the criminal proceedings.

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

Admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident and provided information to the prosecutor.

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

Admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

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

REQUEST NO. 108: Tsottles was present.

Admitted only that Mr. Tsottles participated in certain of the criminal proceedings relating to the Incident.

REQUEST NO. 109: Palmer was present.

Admitted only that Mr. Palmer participated in certain of the criminal proceedings relating to the Incident.

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

Denied.

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

Denied.

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

Denied.

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

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

The WM Defendants further object to this Request on the grounds that it [...] seeks information that is protected by the attorney-client privilege and/or work product doctrine.

Denied.

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

Denied.

The following apply generally.

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

Denied.

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

Denied.

REQUEST NO. 117: [BLANK]
RESPONSE NO. 117: No response is required.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.

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

Denied.