

# EXHIBIT L

## **REQUEST FOR PRODUCTION OF DOCUMENTS**

### **GENERAL DOCUMENT REQUESTS**

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

**RESPONSE NO. 1:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that they will produce non-privileged documents and communications that relate to the incident that occurred on October 16, 2017 at 3200 St. Paul Street, Baltimore, Maryland 21218, involving Plaintiff (the “Incident”), the Application for Statement of Charges filed on or about October 17, 2017 (“Charging Document”), and the criminal proceedings that followed (the “Criminal Proceedings”) in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 3:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "vehicles," "the scene," "occurrence," and "any other matter," which are not defined and susceptible to multiple interpretations; and because is not clear as to the subject of the Request; is

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 4:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "video surveillance" and "imaging," which are not defined and susceptible to multiple interpretations; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, the WM Defendants state that there is no insurance policy that might cover any claim in the above-captioned action.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 6:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 7:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and

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

Subject to and without waiving these objections, the WM Defendants state that they will produce non-privileged documents (including photographs or video recordings) and communications that relate to the Incident, the Charging Document, and the Criminal Proceedings in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 8:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that no such documents currently exist, but that they will supplement their response to this Request as appropriate.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 9:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous as to the language “standards in the industry”; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants refer Plaintiff to its motion to dismiss briefing in this action, but that it otherwise will not produce the documents requested.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery



obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 10:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “recordings,” “vehicles,” “the scene,” and “any other matter,” which are not defined and susceptible to multiple interpretations and because it is not clear as to the subject of the Request; is unduly burdensome; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that they will produce any non-privileged video recordings that relate to the Incident in their possession, custody, or control that the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

Subject to and without waiving these objections, the WM Defendants state that there are no documents responsive to this Request in their possession, custody, or control.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 12:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “safety manuals” and “driver or operator manuals,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks trade secret and/or personal information. The WM Defendants further object to this Request on the ground

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 13:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous as to the term "occurrence"; is unduly burdensome; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 5.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 14:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 6.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 15:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 7.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 16:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous as to the subject of the Request; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 8.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 6.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 18:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous, particularly as to the term “occurrence,” which is undefined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 19:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous as to the subject of the Request; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; information; is premature; and seeks information that is protected by the attorney-client privilege and/or work product doctrine;. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that that they will identify any witnesses they intend to call at trial, including expert witnesses, and will produce a copy of documents provided to any expert witness in accordance with the deadlines set forth in the Scheduling Order issued in the above-captioned action dated July 15, 2024, and the Maryland Rules.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 20:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until



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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 21:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege, work product doctrine, and/or settlement privilege. The WM

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

Subject to and without waiving these objections, the WM Defendants state that there are no documents responsive to this Request in their possession, custody, or control.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, the documents requested are not being produced.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 23:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 5.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 24:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous as to the subject of the request; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 8.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 25:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 26:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "human resources data," "background information," "performance data," "metrics, etc.," and "affiliation," which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks personal information; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs,

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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

**REQUEST NO. 27:** All documents and/or contents (including private messages or hidden or restricted content) of any social media accounts under the ownership or control of Tsottles or Palmer between January 2017 and the present.

**RESPONSE NO. 27:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “social media accounts,” “contents,” “private messages,” “hidden or restricted content,” and “under the ownership or control,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 28:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 30:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is



inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “inter-and intra-party communications,” “incidents,” “locations,” “messages” and “conference room reservations,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 31:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “inter-and intra-party communications,” “messages” and “conference room reservations,” which are not defined and susceptible to multiple interpretations; is unduly

burdensome; is not clear as to the subject of the Request; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 32:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks the private and personal information of third parties; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 33:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 35:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “procedures standards,” “formal or informal practices,” “employee and/or contractor relations,” and “WMM,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 36:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “WMI,” “involvement,” “operations, management, and/or running” and “WMM,” which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants refer Plaintiff to the Affidavit of Courtney A. Tippy submitted in support of the WM Defendant's Motion to Dismiss Second Amended Verified Complaint.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 37:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "data retention," "access control," "identity management," and "event logging," which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and

their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 39:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “supervisory oversight,” and “investigatory, legal, or other functional superiority,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; seeks private and personal information; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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



the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

**RESPONSE NO. 41:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “records,” “Driver call-in records,” “Gate record receipts,” “Over/short and damage reports,” “Commercial Vehicle Safety Alliance reports,” “Driver and operator reports,” “On-board computer reports,” and “operations,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is compound; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

**Regarding Adam Tsottles:**

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

**RESPONSE NO. 42:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 40.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 43:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “notes,” which is not defined and susceptible to multiple interpretations;

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 44:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "qualification file" and "investigation," which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 47:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and is duplicative. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 48:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 49:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 50:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence.



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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 53:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 54:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 55:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 58:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term "occurrence reports," which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 60:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal

jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “inspection” and “incident reports,” which are not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 61:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the “insurance coverage” information being sought; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.



Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 5.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 62:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

**Regarding Adam Tsottles:**

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

**RESPONSE NO. 63:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms “organizational structure,” “Waste Management,” “formal and informal supervisory, reporting or oversight practices,” “WMM,” WMI,” “affiliated entities,” and “functions,” which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 40.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 64:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “notes,” which is not defined and susceptible to multiple interpretations; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 43.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 65:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous,

particularly as to the terms “qualification file” and “investigation,” which are not defined and susceptible to multiple interpretations; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 44.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 66:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term “record,” which is not defined and susceptible to multiple interpretations; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is duplicative; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 45.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 67:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 46.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 68:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and is duplicative. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 47.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 69:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is duplicative; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 48.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 49.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 71:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 50.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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



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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 51.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 73:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "drug and alcohol file" and "return to duty," which are not defined and susceptible to multiple interpretations; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 52.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 53.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 75:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 54.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 76:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 55.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 56.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 57.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 79:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous,

particularly as to the term “occurrence reports,” which is not defined and susceptible to multiple interpretations; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 58.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 80:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 59.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 81:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the term "inspection" and "incident reports," which are not defined and susceptible to multiple interpretations; is duplicative; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 60.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 82:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the “insurance coverage” information being sought; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants’ Response to Request for Production No. 5.

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 83:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is



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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 62.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 84:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the ground that it is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 85:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks private and personal information. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

**RESPONSE NO. 86:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

- a. trip distance;
- b. total vehicle driving time;
- c. load factor;
- d. vehicle speed limit;
- e. maximum vehicle speed recorded;
- f. number of hard brake incidents;
- g. current engine speed (rpm);
- h. maximum and minimum cruise speed limits;
- i. total vehicle driving distance;
- j. fuel consumption (gal./hr.);
- k. idle time;
- l. engine governed speed;
- m. maximum engine speed recorded;
- n. current throttle position;
- o. brake switch status (on/off);

- p. odometer;
- q. trip driving time;
- r. overall fuel economy (MPG);
- s. average driving speed;
- t. number of engine overspeeds;
- u. number of vehicle overspeeds;
- v. current vehicle speed (MPH);
- w. clutch switch status (on/off); and
- x. clock.

**RESPONSE NO. 87:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous; is unduly burdensome; is compound; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 88:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 89:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "Video Recording System" and "vehicles," which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks the personal information of third parties. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 90:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "Radar Collision Warning System" and "vehicles," which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks the personal information of third parties. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery

obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 91:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous, particularly as to the terms "Accelerometer Recording System" and "vehicles," which are not defined and susceptible to multiple interpretations; is unduly burdensome; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; and seeks the personal information of third parties. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 92:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

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

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

**PLAINTIFF’S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS’ REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff’s Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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



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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 95:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is unduly burdensome; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

## **Expert Witness Documentation**

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

**RESPONSE NO. 96:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; is vague and ambiguous; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that 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.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 97:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is premature and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 98:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which

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

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 99:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 100:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; and seeks information that is protected by the attorney-client privilege and/or work product doctrine. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 101:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and is premature. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 103:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence and is premature. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, *see* the WM Defendants' response to Request No. 96.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery



obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 104:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; is duplicative; and seeks the private financial and/or personal information of third parties. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 105:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 106:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad; seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence; is premature; is duplicative; and seeks the private financial and/or personal information of third parties. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which

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

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

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

#### **Contracts and Leases**

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

**RESPONSE NO. 107:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that they will produce a copy of any contract for waste disposal services at or around the Incident, which was in effect on October 16, 2017, which the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 108:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on the ground that the Court lacks personal jurisdiction over WMI. The WM Defendants further object to this Request on the grounds that it is overbroad as to time; is vague and ambiguous; is duplicative; and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. The WM Defendants further object to this Request on the ground that the total volume of discovery served by Plaintiffs, which includes 110 document requests and 134 requests for admission, is unduly burdensome and oppressive.

Subject to and without waiving these objections, the WM Defendants state that they will produce a copy of any contract for waste disposal services at or around the Incident, which was in effect on October 16, 2017, which the WM Defendants are able to locate after a diligent search and reasonable inquiry.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE**

**COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

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

Subject to and without waiving these objections, the WM Defendants state that they do not have any documents responsive to this Request in their possession, custody, or control.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.

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

**RESPONSE NO. 110:** The WM Defendants incorporate their General Objections. The WM Defendants further object to this Request on the ground that the Request is improperly directed to WMI because the Court lacks personal jurisdiction over WMI. WMI has filed a motion to dismiss on the basis of, among other things, lack of personal jurisdiction over WMI and, until the Court rules on this issue and other dispositive challenges, discovery directed to WMI is inappropriate. By serving these objections and responses, WMI does not consent to personal jurisdiction and expressly reserves all rights to seek dismissal or otherwise defend this action on

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

Subject to and without waiving these objections, *see* the WM Defendants' Response to Request for Production No. 5.

**PLAINTIFF'S REASONS WHY DISCOVERY SHOULD BE COMPELLED:** None identified specific to this Request.

**WM DEFENDANTS' REASONS WHY DISCOVERY SHOULD NOT BE COMPELLED:** WM Defendants incorporate by reference their Response to this Request and their Opposition to Plaintiff's Motion to Compel. WM Defendants have met their discovery obligations in responding to this Request, and there is no reason to compel them to modify or withdraw their objections or otherwise alter their Response.