

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

DOUG HANDSHOE

CIVIL ACTION 13-251

Versus

AARON F. BROUSSARD ET AL

JUDGE: LOUIS GURIOLA

MAG: JOHN ROPER

**PLAINTIFF'S INTERROGATORIES TO BE
ANSWERED BY DEFENDANTS UNDER OATH**

TO: Daniel G. Abel

General Instructions

If any claim or privilege is asserted, the defendant shall recite the precise nature of the privilege and the particular statute upon which defendant relies in its effort to thwart or resist discovery; the reason for claiming the privilege; if the claim of privilege relates to information obtained from a client, informant, or witness, identify the client, informant or witness by full name, home address and business address.

If any of your witnesses cannot provide responsive answers to any of the discovery, please affirm your witnesses can provide no such information as the case may be. If defendant in any event cannot provide responsive answers to any of the discovery, affirm there are no such facts and/or documents as the case may be. If defendant did not undertake and/or document an action as set out in these interrogatories, as the case may be, affirm there are no such undertakings and/or documentation of the action as the case may be.

Answers to the propounded Discovery shall be served on the undersigned counsel within the delays allowed by law and to be answered and responded to personally or through an officer of the defendant, in writing, signed and under oath. In accordance with the decision of the United States Supreme Court in *Hickman vs. Taylor*, 329 U.S. 495 (1947), the answers and responses require all pertinent information gathered by you or on your behalf through interviews with witnesses and through other investigations, in addition to information available to you, or directly within your knowledge, or the knowledge of your employees, agents, servants, insurers and attorneys agents, attorneys, servants, employees, officials, contractors and other such persons and/or entities associated with defendant.

Timely supplementation of your answers and responses is specifically demanded.

“Defendant”, “You”, “your” “on your behalf” refers to and includes the defendants --- and all agents, servants, employees, officials, contractors and other such persons and/or entities associated with Defendant relevant to the times complained of in this litigation, including the time of the accident and subsequent thereto.

Defendant is to identify by name and address the person or persons who made out these responses and/or participated or assisted in the preparation of these responses.

1.

Set forth all facts with detail, and not in conclusory manner, upon which you rely which support your claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

Identify each expert the defendant may call in deposition and/or to testify at trial and state the substance of the facts and opinions which the person possesses or has communicated to defendant which are relevant to the answers you provide in response to interrogatory number one.

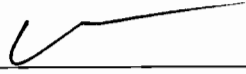
ANSWER:

3.

Identify any and all persons/entities who have conducted any investigation to support your claim that the monetary extent of injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction, the name of the person who on behalf of defendant contacted the person/entity carrying out the investigation, the name of the person who on behalf of defendant received any report resulting from the investigation, and whether or not the report submitted to defendant was oral or written.

ANSWER:

Respectfully submitted,



CERTIFICATE OF SERVICE

I hereby certify that I have on this 1st day of July, 2013 served a copy of the foregoing on counsel for defendant via the United States Postal Service, by certified mail, properly addressed and postage prepaid.



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

DOUG HANDSHOE

CIVIL ACTION 13-251

Versus

AARON F. BROUSSARD ET AL

JUDGE: LOUIS GUIROLA

MAG.: JOHN ROPER

PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS TO BE RESPONDED

TO BY DEFENDANT UNDER OATH

Pursuant to the Federal Rules of Civil Procedure, plaintiff requests the defendant to produce the listed documents and things at the offices of Doug Handshoe, 110 Hall Street, Post Office Box 788, Wiggins, MS 39577. These documents are to be provided for inspection and copying, where applicable, on or before the time periods permitted by law. The term "document" shall be interpreted to include writings of any description, graphs, charts, notes, photographs, sound recordings, or other data compilations from which information can be obtained or translated. The term "photographs" shall be interpreted to mean all pictorial depictions by whatever means and shall include negatives, positive prints, copies of prints, Polaroids, or any other pictorial information in the custody of defendant.

Where documents or photographs are requested herein, the request shall be interpreted to include all non-identical copies of the same item including, but without limitation, copies on which marginal notations have been made, routing stamps have been affixed, and the like.

If privilege or statutory protection from production is claimed with regard to any of the photographs or documents sought herein, please furnish the following information relative to the claim: The precise nature of the privilege the particular statute upon which defendant relies in its effort to resist discovery; the reason for claiming the privilege; identify each document or photograph by general title or description, date of creation or acquisition, and the author or creator and the person who has custody of the same; if the claim of privilege relates to information obtained from a client, informant, or witness, please identify the client, informant or witness by full name, home address and business address.

Defendant represents the documents provided are true and correct documents upon which

Plaintiff can reasonably rely.

Production is requested of the following documents the defendant now possesses or has available now and subsequent to this request and under the continuing duty of defendant to supplement responses:

1.

Any and all exhibits which you possess or may offer into evidence at hearing on the issue of removal of the Mississippi state court filing which you contend justify removal to federal court under diversity jurisdiction.

RESPONSE:

2.

Any and all surveillance conducted by defendant of plaintiff.

RESPONSE:

3.

Any and all demonstrative aids which you may use at trial.

RESPONSE:

4.

A current curriculum vitae for every witness whom you may call as a witness at trial.

RESPONSE:

5.

Any and all reports from each and every witness whom you may depose and/or call as a witness at the hearing. In the event any such witness has not produced his observations and/or opinions to writing, request and demand for such observations and/or opinions is hereby made.

RESPONSE:

6.

All documents upon which you relied and/or will use at the hearing on the motion to remove.

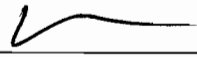
RESPONSE:

7.

All documents relied on or used by defendant in answering the interrogatories, requests for admission and admission of facts propounded by Plaintiff on defendant.

RESPONSE:

Respectfully submitted,



CERTIFICATE OF SERVICE

I hereby certify that I have on this 15th day of July, 2013 served a copy of the foregoing on counsel for defendant via the United States Postal Service, by certified mail, properly addressed and postage prepaid.



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

DOUG HANDSHOE

CIVIL ACTION 13-251

Versus

AARON F. BROUSSARD ET AL

JUDGE: LOUIS GUIROLA

MAG. JOHN ROPER

PLAINTIFF'S REQUEST FOR ADMISSION OF FACTS

Plaintiff, pursuant to the terms of the Federal Rules of Civil Procedure, propounds the following Request for Admission of Facts upon defendant and hereby advises the defendant that each of the matters and things of which admission is requested shall be deemed admitted by the defendant unless a sworn statement, delivered to the plaintiff on or before the 30th day after service hereof, either denying specifically the matters and things of which an admission is requested, or setting forth in detail the reasons why defendant cannot truthfully either admit or deny such a request.

The defendant is further advised that this Request for Admission of Facts is subject to use in the above entitled and numbered cause and if used, the original of this Request for Admission of Facts will be delivered to the clerk of the above court for filing in this action. "Defendant", as used in this Request for Admission of Facts, means defendant and all other representatives, agents, servants, employees and privities of the defendant.

1.

The Defendants did not conduct a good faith investigation in support of the claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

The Defendant's investigation presented no evidence supporting Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

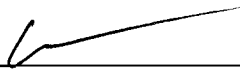
3.

That Defendants have no factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

4.

That in the event Defendants do possess factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction, the Defendants have not presented to Plaintiff all such factual and documentary basis in response to Plaintiff's Interrogatories and Requests for Production of Documents.

Respectfully submitted,



CERTIFICATE OF SERVICE

I hereby certify that I have on this 15th day of July, 2013 served a copy of the foregoing on counsel for defendant via the United States Postal Service, by certified mail, properly addressed and postage prepaid.



**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

DOUG HANDSHOE

CIVIL ACTION 13-251

Versus

AARON F. BROUSSARD ET AL

JUDGE: LOUIS GURIOLA

MAG: JOHN ROPER

**PLAINTIFF'S INTERROGATORIES TO BE
ANSWERED BY DEFENDANTS UNDER OATH**

TO: Chris Yount

General Instructions

If any claim or privilege is asserted, the defendant shall recite the precise nature of the privilege and the particular statute upon which defendant relies in its effort to thwart or resist discovery; the reason for claiming the privilege; if the claim of privilege relates to information obtained from a client, informant, or witness, identify the client, informant or witness by full name, home address and business address.

If any of your witnesses cannot provide responsive answers to any of the discovery, please affirm your witnesses can provide no such information as the case may be. If defendant in any event cannot provide responsive answers to any of the discovery, affirm there are no such facts and/or documents as the case may be. If defendant did not undertake and/or document an action as set out in these interrogatories, as the case may be, affirm there are no such undertakings and/or documentation of the action as the case may be.

Answers to the propounded Discovery shall be served on the undersigned counsel within the delays allowed by law and to be answered and responded to personally or through an officer of the defendant, in writing, signed and under oath. In accordance with the decision of the United States Supreme Court in *Hickman vs. Taylor*, 329 U.S. 495 (1947), the answers and responses require all pertinent information gathered by you or on your behalf through interviews with witnesses and through other investigations, in addition to information available to you, or directly within your knowledge, or the knowledge of your employees, agents, servants, insurers and attorneys agents, attorneys, servants, employees, officials, contractors and other such persons and/or entities associated with defendant.

Timely supplementation of your answers and responses is specifically demanded.

“Defendant”, “You”, “your” “on your behalf” refers to and includes the defendants --- and all agents, servants, employees, officials, contractors and other such persons and/or entities associated with Defendant relevant to the times complained of in this litigation, including the time of the accident and subsequent thereto.

Defendant is to identify by name and address the person or persons who made out these responses and/or participated or assisted in the preparation of these responses.

1.

Set forth all facts with detail, and not in conclusory manner, upon which you rely which support your claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

Identify each expert the defendant may call in deposition and/or to testify at trial and state the substance of the facts and opinions which the person possesses or has communicated to defendant which are relevant to the answers you provide in response to interrogatory number one.

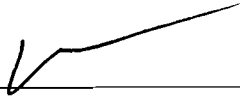
ANSWER:

3.

Identify any and all persons/entities who have conducted any investigation to support your claim that the monetary extent of injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction, the name of the person who on behalf of defendant contacted the person/entity carrying out the investigation, the name of the person who on behalf of defendant received any report resulting from the investigation, and whether or not the report submitted to defendant was oral or written.


ANSWER:

Respectfully submitted,



CERTIFICATE OF SERVICE

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF MISSISSIPPI**

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Defendant represents the documents provided are true and correct documents upon which

Plaintiff can reasonably rely.

Production is requested of the following documents the defendant now possesses or has available now and subsequent to this request and under the continuing duty of defendant to supplement responses:

1.

Any and all exhibits which you possess or may offer into evidence at hearing on the issue of removal of the Mississippi state court filing which you contend justify removal to federal court under diversity jurisdiction.

RESPONSE:

2.

Any and all surveillance conducted by defendant of plaintiff.

RESPONSE:

3.

Any and all demonstrative aids which you may use at trial.

RESPONSE:

4.

A current curriculum vitae for every witness whom you may call as a witness at trial.

RESPONSE:

5.

Any and all reports from each and every witness whom you may depose and/or call as a witness at the hearing. In the event any such witness has not produced his observations and/or opinions to writing, request and demand for such observations and/or opinions is hereby made.

RESPONSE:

6.

All documents upon which you relied and/or will use at the hearing on the motion to remove.

RESPONSE:

7.

All documents relied on or used by defendant in answering the interrogatories, requests for admission and admission of facts propounded by Plaintiff on defendant.

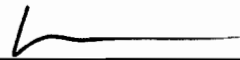
RESPONSE:

Respectfully submitted,



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The defendant is further advised that this Request for Admission of Facts is subject to use in the above entitled and numbered cause and if used, the original of this Request for Admission of Facts will be delivered to the clerk of the above court for filing in this action. "Defendant", as used in this Request for Admission of Facts, means defendant and all other representatives, agents, servants, employees and privities of the defendant.

1.

The Defendants did not conduct a good faith investigation in support of the claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

The Defendant's investigation presented no evidence supporting Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

3.

That Defendants have no factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

4.

That in the event Defendants do possess factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction, the Defendants have not presented to Plaintiff all such factual and documentary basis in response to Plaintiff's Interrogatories and Requests for Production of Documents.

Respectfully submitted,



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JUDGE: LOUIS GURIOLA

MAG: JOHN ROPER

**PLAINTIFF'S INTERROGATORIES TO BE
ANSWERED BY DEFENDANTS UNDER OATH**

TO: Henry Laird Counsel for Trout Point Lodge Ltd. Charles Leary and Vaughn Perret

General Instructions

If any claim or privilege is asserted, the defendant shall recite the precise nature of the privilege and the particular statute upon which defendant relies in its effort to thwart or resist discovery; the reason for claiming the privilege; if the claim of privilege relates to information obtained from a client, informant, or witness, identify the client, informant or witness by full name, home address and business address.

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Defendant is to identify by name and address the person or persons who made out these responses and/or participated or assisted in the preparation of these responses.

1.

Set forth all facts with detail, and not in conclusory manner, upon which you rely which support your claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

Identify each expert the defendant may call in deposition and/or to testify at trial and state the substance of the facts and opinions which the person possesses or has communicated to defendant which are relevant to the answers you provide in response to interrogatory number one.

ANSWER:

3.

Identify any and all persons/entities who have conducted any investigation to support your claim that the monetary extent of injuries of Doug Handshoe as set forth in state court filing which you contend justify removal to federal court under diversity jurisdiction, the name of the person who on behalf of defendant contacted the person/entity carrying out the investigation, the name of the person who on behalf of defendant received any report resulting from the investigation, and whether or not the report submitted to defendant was oral or written.

ANSWER:

Respectfully submitted,



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**UNITED STATES DISTRICT COURT
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TO BY DEFENDANT UNDER OATH

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Production is requested of the following documents the defendant now possesses or has available now and subsequent to this request and under the continuing duty of defendant to supplement responses:

1.

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RESPONSE:

2.

Any and all surveillance conducted by defendant of plaintiff.

RESPONSE:

3.

Any and all demonstrative aids which you may use at trial.

RESPONSE:

4.

A current curriculum vitae for every witness whom you may call as a witness at trial.

RESPONSE:

5.

Any and all reports from each and every witness whom you may depose and/or call as a witness at the hearing. In the event any such witness has not produced his observations and/or opinions to writing, request and demand for such observations and/or opinions is hereby made.

RESPONSE:

6.

All documents upon which you relied and/or will use at the hearing on the motion to remove.

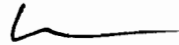
RESPONSE:

7.

All documents relied on or used by defendant in answering the interrogatories, requests for admission and admission of facts propounded by Plaintiff on defendant.

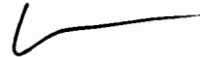
RESPONSE:

Respectfully submitted,



CERTIFICATE OF SERVICE

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**UNITED STATES DISTRICT COURT
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JUDGE: LOUIS GUIROLA

MAG. JOHN ROPER

PLAINTIFF'S REQUEST FOR ADMISSION OF FACTS

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1.

The Defendants did not conduct a good faith investigation in support of the claim that the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

ANSWER:

2.

The Defendant's investigation presented no evidence supporting Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

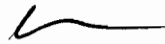
3.

That Defendants have no factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction.

4.

That in the event Defendants do possess factual and documentary basis for the Defendants' claim the monetary extent of the injuries of Doug Handshoe as set forth in state court filing which Defendants contend justify removal to federal court under diversity jurisdiction, the Defendants have not presented to Plaintiff all such factual and documentary basis in response to Plaintiff's Interrogatories and Requests for Production of Documents.

Respectfully submitted,



CERTIFICATE OF SERVICE

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