

EXHIBIT 1a

doors” is vague, ambiguous, undefined, and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party’s claims or defenses and is not proportional to the needs of discovery as information regarding Sergeant Baker’s arrival on scene is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection, denied. Upon arrival at plaintiff’s residence, I walked in front of the residence before walking around the back of the house after attempting to confirm the location of the responding officer.

3. On 5-5-2018, upon arrival at Plaintiff’s home in Wilton, you did not ring the front doors of the home.

OBJECTION: Defendant objects to this request as it is not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party’s claims or defenses and is not proportional to the needs of discovery as information regarding whether Sergeant Baker rang plaintiff’s doorbell is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection, admitted. Upon arrival at plaintiff’s residence, I walked in front of the residence before walking around the back of the house after attempting to confirm the location of the responding officer.

4. On 5-5-2018, upon arrival at Plaintiff’s home in Wilton, you did not knock at the front doors of the home.

OBJECTION: Defendant objects to this request as it is not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to

ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding whether Sergeant Baker knocked on plaintiff's door is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection, admitted. Upon arrival at plaintiff's residence, I walked in front of the residence before walking around the back of the house after attempting to confirm the location of the responding officer.

5. On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you did not make your presence immediately known to the occupants or residents in the home.

RESPONSE: Denied. Upon arrival at plaintiff's residence, I walked in front of the residence before walking around the back of the house after attempting to confirm the location of the responding officer. Once I arrived at the back of the residence I made contact with the responding officer and the residence's occupants.

6. On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you stealthily walked around the side of the home and ascended the steps to a deck at the rear of the home.

RESPONSE: As to the allegations of Paragraph 6, it is only admitted that I walked around the side of the home. It is denied that I proceed around the home "stealthily." Upon arrival at plaintiff's residence, I walked in front of the residence before walking around the back of the house after attempting to confirm the location of the responding officer. Once I arrived at the back of the residence I made contact with the responding officer and the residence's occupants on the rear deck.

8(sic). On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you were armed with a firearm.

EXHIBIT 1b

are denied.

35. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you knelt upon Plaintiff's outstretched, handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 35, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 35 are denied.

36. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you leaned upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 36, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 36 are denied.

37. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you stepped upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 37, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 37 are denied.

38. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you placed your body weight upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 38, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 38 are denied.

39. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you were in close proximity to Plaintiff.

OBJECTION: Defendant objects to this request as the term “you were in close proximity to Plaintiff” is vague, ambiguous, undefined, not limited to a specific time or scope and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party’s claims or defenses and is not proportional to the needs of discovery as information regarding whether plaintiff exited her home has no tendency to make any material fact more or less probable.

RESPONSE: As to the allegations of Paragraph 39, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 39 are denied as the door of the police cruiser was closed as soon as plaintiff was secured inside.

40. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you stated to Plaintiff “we all know about your lawsuit bitch, this is what happens when you sue us”.

RESPONSE: Denied.

41. On 5-5-2018 you created a police form 17-503 about Plaintiff, which you gave to the ambulance personnel.

RESPONSE: Admitted.

42. On 5-5-2018 you entered information in the police form 17-503 which stated that Plaintiff “repeatedly stated to officer that she would “fucking kill you””.

OBJECTION: This request is objectionable insofar as it seeks information already known to plaintiff and because the information sought can be ascertained through a review of the document cited by plaintiff.

RESPONSE: Objection pending. The form is a document to which reference is made for its full terms and conditions.

43. On 5-5-2018 you knew that this information you entered in the police form 17-503

which stated that Plaintiff “repeatedly stated to officer that she would “fucking kill you”” was false, because Plaintiff had made no such statements.

RESPONSE: Denied.

44. On 5-5-2018, while you were at Plaintiff’s home, you were equipped with a body-worn camera.

RESPONSE: Admitted.

45. On 5-5-2018, while you were still at Plaintiff’s home, you turned off your body-worn camera.

RESPONSE: As to the allegations of Paragraph 45, it is only admitted that, at the completion of our investigation, once I was back in my Police Cruiser, I deactivated my body worn camera.

46. On 5-5-2018, after turning off your body-worn camera you continued to interact with various people at the scene.

RESPONSE: Denied.

47. On 5-5-2018, you went to Norwalk Hospital, where Plaintiff had been transported.

RESPONSE: As to the allegations of Paragraph 47, it is only admitted that I went to Norwalk Hospital to provide Sergeant Tornello, who had ridden in the ambulance at plaintiff’s request, a ride.

48. On 5-5-2018, when you went to Norwalk Hospital you did not turn your body-worn camera on to record.

RESPONSE: As to the allegations of paragraph 48, it is only admitted that I did not turn on my body-worn camera at Norwalk Hospital as I did not have any direct interaction with the plaintiff.

49. On 5-5-2018, you interacted with and spoke to various people present at Norwalk

RESPONSE: Objection pending. The report is a document to which reference is made for its full terms and conditions.

57. When you wrote the information in the paragraph above, you knew it be false since Plaintiff did not at any time state or yell “I will kill you” to the police officers or to anyone else.

RESPONSE: Denied.

58. You entered material false information into this police report regarding Plaintiff.

RESPONSE: Denied.

59. After 5- 5-2018 you visited the area in the immediate vicinity of Plaintiff’s home multiple times.

OBJECTION: Defendant objects to this request as the term “you visited the area in the immediate vicinity of Plaintiff’s home multiple times” is vague, ambiguous, undefined, and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party’s claims or defenses and is not proportional to the needs of discovery as information regarding Officer Canepari’s subsequent visits to plaintiff’s neighborhood as part of his police duties is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection but for instances where I was in the area as part of my official duties as a police officer for the Town of Wilton, denied.

60. After 5-5-2018 you threw objects into the curtilage of Plaintiff home on multiple separate occasions.

OBJECTION: Defendant objects to this request as the term “you visited the area in the immediate vicinity of Plaintiff’s home multiple times” is vague, ambiguous, undefined, and

not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding Officer Canepari's subsequent visits to plaintiff's neighborhood as part of his police duties is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection, denied.

61. You are a member of a police union.

RESPONSE: Admitted.

62. You discussed the 3-20-2017 incident involving Plaintiff with various members of your police union.

OBJECTION: Defendant objects to this request as it is not reasonably limited in time or scope or tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

63. You discussed the 5-5-2018 incident involving Plaintiff with various members of your police union.

OBJECTION: Defendant objects to this request as it is not reasonably limited in time or scope or tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in

EXHIBIT 1c

RESPONSE: Denied.

3. On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you did not approach the front doors of the home.

OBJECTION: Defendant objects to this request as the term "approach the front doors" is vague, ambiguous, undefined, and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding Officer Harris' arrival on scene is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection it is admitted that, upon arrival at plaintiff's residence, I approached the deck at the rear of the residence where Officer Canepari had already made contact with the residents.

4. On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you did not ring or knock at the front doors of the home.

OBJECTION: Defendant objects to this request as the term "approach the front doors" is vague, ambiguous, undefined, and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding Officer Harris' arrival on scene is of no consequence in this case and has no tendency to make any material fact more or less probable.

RESPONSE: Subject to and without waiving the foregoing objection, admitted. Upon arrival at plaintiff's residence, I approached the deck at the rear of the residence where Officer Canepari had already made contact with the residents.

5. On 5-5-2018, upon arrival at Plaintiff's home in Wilton, you did not make your

her arm and hand.

RESPONSE: As to the allegations of Paragraph 19, it is admitted that plaintiff complained of injuries, but that the handcuffs that were applied were properly checked for tightness and double locked to ensure that they were applied properly.

20. On 5-5-2018, after handcuffing Plaintiff you grasped her arm and brought her to a police cruiser parked upon Plaintiff's property without authorization.

RESPONSE: As to the allegations of Paragraph 20, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 20 are denied as the conduct of the defendants was entirely reasonable under the circumstances and necessary to deescalate the situation and complete their investigation.

21. On 5-5-2018, you forcibly placed Plaintiff inside this parked police cruiser.

RESPONSE: As to the allegations of Paragraph 21, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 21 are denied as the conduct of the defendants was entirely reasonable under the circumstances and necessary to deescalate the situation and complete their investigation.

22. On 5-5-2018, while placing Plaintiff inside this parked police cruiser you leaned into the police cruiser with your body and your extremities.

RESPONSE: As to the allegations of Paragraph 22, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 22 are denied as the conduct of the defendants was entirely reasonable under the circumstances and necessary to deescalate the situation and complete their investigation.

23. On 5-5-2018, while placing Plaintiff inside the parked police cruiser you adjusted or otherwise altered the placement of the handcuffs on Plaintiff's wrists.

RESPONSE: As to the allegations of Paragraph 23, it is only admitted that plaintiff was

ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 23 are denied.

24. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you knelt upon Plaintiff's outstretched, handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 24, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 24 are denied.

25. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you leaned upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 25, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 25 are denied.

26. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you stepped upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 26, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 26 are denied.

27. On 5-5-2018, while, or immediately after, placing Plaintiff inside the parked police cruiser you placed your body weight upon Plaintiff's outstretched handcuffed wrists, hands and arms.

RESPONSE: As to the allegations of Paragraph 27, it is only admitted that plaintiff was ultimately placed in the back of a police cruiser. The remaining allegations of Paragraph 27 are denied.

28. On 5-5-2018, while you were at Plaintiff's home, you were equipped with a body-

worn camera.

RESPONSE: Admitted.

29. On 5-5-2018, while you were still at Plaintiff's home, you turned off your body-worn camera.

RESPONSE: As to the allegations of Paragraph 29, it is only admitted that, at the completion of our investigation, I deactivated my body worn camera.

30. On 5-5-2018, after turning off your body-worn camera you continued to interact with various people at the scene.

RESPONSE: Denied.

31. On 5-5-2018, you went to Norwalk Hospital, where Plaintiff had been transported.

RESPONSE: Denied.

32. On 5-5-2018, when you went to Norwalk Hospital you did not turn your body-worn camera on to record.

RESPONSE: Denied as I did not go to Norwalk Hospital.

33. On 5-5-2018, you interacted with and spoke to various people present at Norwalk Hospital.

RESPONSE: Denied as I did not go to Norwalk Hospital.

34. After the incident at Plaintiff's home and in the Norwalk Hospital, you wrote a police report.

RESPONSE: As to the allegations of Paragraph 34, it is denied that I wrote a report regarding plaintiff's time at Norwalk Hospital as I did not go to the Hospital. Admitted as to remainder.

35. In the police report you wrote that during the incident of 5-5-2018, Plaintiff "pushed officer Baker".

OBJECTION: This request is objectionable insofar as it seeks information already known to plaintiff and because the information sought can be ascertained through a review of the document cited by plaintiff.

RESPONSE: Objection pending. The report is a document to which reference is made for its full terms and conditions.

36. When you wrote the information in the paragraph above, you knew it be false since Plaintiff did not at any time push officer Baker.

RESPONSE: Denied.

37. In the police report you wrote that during the incident of 5-5-2018, Plaintiff was “shoving her body against mine”.

OBJECTION: This request is objectionable insofar as it seeks information already known to plaintiff and because the information sought can be ascertained through a review of the document cited by plaintiff.

RESPONSE: Objection pending. The report is a document to which reference is made for its full terms and conditions.

38. When you wrote the information in the paragraph above, you knew it be false since Plaintiff did not at any time shove her body against anyone.

RESPONSE: Denied.

39. You entered material false information into this police report regarding Plaintiff.

RESPONSE: Denied.

40. You are a member of a police union.

RESPONSE: Admitted.

41. You discussed the 5-5-2018 incident involving Plaintiff with various members of your police union.

OBJECTION: Defendant objects to this request as it is not reasonably limited in time or scope or tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

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EXHIBIT 1d

20. After you departed Norwalk Hospital you contacted Robert Cipolla, and informed him of, and discussed with him, Plaintiff's allegations and statements.

RESPONSE: Denied.

21. After you departed Norwalk Hospital you contacted Arnault Baker, and informed him of and discussed with him, Plaintiff's allegations and statements.

RESPONSE: Denied.

22. You are a member of a police union.

RESPONSE: Admitted.

23. You discussed the 5-5-2018 incident involving Plaintiff with various members of your police union.

OBJECTION: Defendant objects to this request as it is vague, not reasonably limited in time or scope and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

24. You were present when various members of your police union discussed "how to deal" with Plaintiff.

OBJECTION: Defendant objects to this request as it is vague, not reasonably limited in time or scope and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no

tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

25. You were present when various members of your police union or department discussed that they planned to harm or injure Plaintiff or her family members.

OBJECTION: Defendant objects to this request as it is vague, not reasonably limited in time or scope and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

26. You were present when various people affiliated with the Town of Wilton as elected or appointed officials discussed that they planned to harm or injure Plaintiff or her family members.

OBJECTION: Defendant objects to this request as it is vague, not reasonably limited in time or scope and not reasonably tied to any actions or inactions of the defendants related to this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding any conversations I may have had with unnamed officials has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

27. You discussed "how to deal" with Plaintiff with various members of your police union.

OBJECTION: Defendant objects to this request as it is vague, not reasonably limited in time or scope and not reasonably tied to any actions or inactions of the defendants related to

this matter such that plaintiff seeks to ascertain information which is irrelevant to any party's claims or defenses and is not proportional to the needs of discovery as information regarding my membership in a Police Union and any private conversations I may have had has no tendency to make any material fact more or less probable.

RESPONSE: Objection pending.

DEFENDANT, SERGEANT ANNA
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EXHIBIT 2a

ANSWER: **Objection pending.**

11. Give a detailed description of the any conversations or interactions that you engaged in or any instructions or information that you received from any member of Wilton Police Department, Town of Wilton or Wilton emergency/911 dispatchers, on 5-5-2018 regarding Plaintiff or any of her family members, and for each such conversation or interactions state the contents of such conversation or instruction, including the name, rank and address of such person(s) involved.

OBJECTION: **See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Additionally, the terms "conversations or interactions that you engaged in or any instructions or information that you received" and "regarding Plaintiff or any of her family members" and "such conversation or instruction" are vague and ambiguous such that they preclude a meaningful response.**

ANSWER: **Objection pending.**

12. Give a detailed description of the events and circumstances of your interactions with Plaintiff on 5-5-5018, describing in detail your physical location at each time of such interactions to including but not limited to:

- A. a detailed description of your physical contact with the Plaintiff;
- B. a detailed description of all verbal statements that you made to Plaintiff and what she stated to you; and,
- C. a detailed description of what you heard her state to any other police officer, ambulance personnel, or any other person; and what you heard them state to her.

OBJECTION: **See General Objections. Defendant further objects to this Interrogatory insofar as it seeks to ascertain information about "physical contact with the Plaintiff" and "all verbal statements that you made to plaintiff and what she stated to you" and "what you heard her state to any other ... person; and what you heard them state to her" as any such physical contact and statements should be known to the plaintiff. This Interrogatory is overly broad and unduly burdensome and duplicative for the additional reason that it seeks**

to ascertain information responsive to other Interrogatories. In addition, this Interrogatory is not reasonably limited in subject matter or time period.

ANSWER: Subject to and without waiving the foregoing objection see body worn camera and incident report. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with the plaintiff on May 5, 2018.

13. Give a detailed description of the events and circumstances of your interactions and conversations with any of the ambulance personnel and Norwalk Hospital personnel, including a detailed description of your physical location at each time of such interactions and what you stated, heard, overheard or witnessed during these interactions.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding "interactions and conversations" as any such interactions and conversations should be known to the plaintiff. This Interrogatory is further objectionable to the extent that this defendant did not go to Norwalk Hospital.

ANSWER: Subject to and without waiving the foregoing see body worn camera and incident report for limited interactions with Wilton Ambulance on scene. As to interactions with Norwalk Hospital, not applicable as I did not go to the hospital on May 5, 2018. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with medical personnel on May 5, 2018.

14. Give a detailed description of the events, circumstances and a description of your actions and interactions with Plaintiff on 5-5-5018, which you claim show that you did not assault, threaten, batter or use unreasonable and excessive force against the Plaintiff, specifying, for each occurrence the following information:

A. when you were handcuffing, detaining, threatening, assaulting, battering or otherwise making any physical contact with Plaintiff on 5-5-2018, your exact location, posture, and all statements that you made to anyone;

B. the name and physical description of every police officer and ambulance personnel, who assisted, aided or abetted you in any manner in handcuffing, detaining, threatening, assaulting,

Plaintiff, or any of her family members on 5-5-2018, or on any other day, and describe in detail the source and format of the recordings which you viewed, whether dash-cameras, in-car cameras, body cameras, or any other audio recordings.

OBJECTION: See General Objections. The Defendant further objects this Interrogatory as overly broad, unduly burdensome as it is not reasonably limited in time or scope and has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks information regarding attorney-client meetings and communications.

ANSWER: Objection pending.

18. State in detail the names and addresses of all people you engaged in conversations of any kind, including the times, locations, and details of all such conversations regarding the incident involving Plaintiff or her family members on 5-5-2018, providing in details all statements, verbal or written, made by you, the details of the statements and what responses received.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, see police reports.

19. Identify all written or recorded statements that you made to any person, committee, commission, investigator, or entity regarding Plaintiff, and state in detail the contents of these statements or records; for each written or recorded statement made, state the times and locations where such statements were made, and your knowledge of where these written or recorded statements are stored or preserved.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and duplicative to the extent that it seeks information already known to the plaintiff and which is responsive to other Interrogatories, i.e. Interrogatory 19. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

EXHIBIT 2b

reviewed by Sgt. Tornello, who determined that the complaint was unfounded.

5. On July 25, 2019, Mr. Pal Melancon submitted a complaint regarding my driving in responding to a burglary in progress call. It was determined that my emergency driving in responding to the call violated procedures and I was counseled and issued a written warning.

3. State whether you have been a party to any lawsuit, legal or administrative action, and for each provide the following details:

4. the name of the parties
5. the date, time, location of the incident(s) or activities(s) which are/were the subject of the lawsuit, legal or administrative action
6. the allegations in the lawsuit, legal or administrative action
7. whether the allegations in the lawsuit, legal or administrative action were investigated and if so the name, ranks and address of the investigator(s), and the date when the investigation(s) began and concluded
8. any statements, written or recorded, that you provided in response to the lawsuit, legal or administrative action(s)
9. the outcome(s) of the lawsuit, legal or administrative action and any written report(s)

OBJECTION: See General Objections. Defendant further objects to Interrogatories 3-9 as overly broad insofar as they are not limited whatsoever with respect to timeframe or investigation subject matter/outcome and in that they seek to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated history is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, other than this matter, I have not been a defendant in any lawsuit.

10. State in detail all activities you engaged in during the twenty four (48) hours immediately preceding AND immediately following 5-5-2018, including, but not limited to, any places to which you traveled and names, and addresses of all individuals with whom you interacted, and if you ingested or utilized any alcoholic beverage, pharmaceutical, narcotic, or

drugs, identify the type and amount of each substance, the time it was ingested, and who else was present at the time it was ingested.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not limited whatsoever with respect to activities and conduct of the defendant and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Specifically, information regarding defendant's unrelated activities and use of any alcoholic beverages, pharmaceuticals, narcotics, or drugs in the time prior to or after his interaction with the defendant is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Objection pending.

11. Give a detailed description of the any conversations or interactions that you engaged in or any instructions or information that you received from any member of Wilton Police Department, Town of Wilton or Wilton emergency/911 dispatchers, on 5-5-2018 regarding Plaintiff or any of her family members, and for each such conversation or interactions state the contents of such conversation or instruction, including the name, rank and address of such person(s) involved.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Additionally, the terms "conversations or interactions that you engaged in or any instructions or information that you received" and "regarding Plaintiff or any of her family members" and "such conversation or instruction" are vague and ambiguous such that they preclude a meaningful response.

ANSWER: Objection pending.

12. Give a detailed description of the events and circumstances of your interactions with Plaintiff on 5-5-5018, describing in detail your physical location at each time of such interactions to including but not limited to:

- A. a detailed description of your physical contact with the Plaintiff;
- B. a detailed description of all verbal statements that you made to Plaintiff and what she stated to you; and,

C. a detailed description of what you heard her state to any other police officer, ambulance personnel, or any other person; and what you heard them state to her.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory insofar as it seeks to ascertain information about “physical contact with the Plaintiff” and “all verbal statements that you made to plaintiff and what she stated to you” and “what you heard her state to any other ... person; and what you heard them state to her” as any such physical contact and statements should be known to the plaintiff. This Interrogatory is overly broad and unduly burdensome and duplicative for the additional reason that it seeks to ascertain information responsive to other Interrogatories. In addition, this Interrogatory is not reasonably limited in subject matter or time period.

ANSWER: Subject to and without waiving the foregoing objection see body worn camera and incident report. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with the plaintiff on May 5, 2018.

13. Give a detailed description of the events and circumstances of your interactions and conversations with any of the ambulance personnel and Norwalk Hospital personnel, including a detailed description of your physical location at each time of such interactions and what you stated, heard, overheard or witnessed during these interactions.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party’s claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding “interactions and conversations” as any such interactions and conversations should be known to the plaintiff. This Interrogatory is further objectionable to the extent that this defendant did not go to Norwalk Hospital.

ANSWER: Subject to and without waiving the foregoing see body worn camera and incident report for limited interactions with Wilton Ambulance on scene. As to interactions with Norwalk Hospital, not applicable as I did not go to the hospital on May 5, 2018. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with medical personnel on May 5, 2018.

14. Give a detailed description of the events, circumstances and a description of your actions and interactions with Plaintiff on 5-5-5018, which you claim show that you did not assault, threaten, batter or use unreasonable and excessive force against the Plaintiff, specifying, for each occurrence the following information:

A. when you were handcuffing, detaining, threatening, assaulting, battering or otherwise making any physical contact with Plaintiff on 5-5-2018, your exact location, posture, and all statements that you made to anyone;

B. the name and physical description of every police officer and ambulance personnel, who assisted, aided or abetted you in any manner in handcuffing, detaining, threatening, assaulting, battering or otherwise making any form of physical contact with Plaintiff, and their exact location, posture and statements made by these police officers and ambulance personnel;

C. if you claim that you did not handcuff, detain , threaten, assault, engage in battery or otherwise make any physical contact with Plaintiff on 5-5-2018, state the exact actions and statements that made to other police officers, or ambulance personnel, to prevent them from engaging in these actions upon Plaintiff;

D. everything you heard each police officer or ambulance Personnel say during the incident of 5-5-208 , and the identity of each officer or ambulance personnel making the statement, and everything you said to each police officer and ambulance personnel;

E. and a detailed description of any physical force or resistance that you claim that Plaintiff used against you, or any other police officer or ambulance personnel on 5-5-2018, the exact locations and times that the claimed physical force or resistance, and any injuries, trauma or other harm that you sustained, or witnessed, as a result of this claimed physical force or resistance by Plaintiff.

OBJECTION: See General Objections. The Defendant further objects to the mischaracterization of his acts at issue. Additionally, this Interrogatory seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatories 11 and 12. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy. This Interrogatory is also objectionable as it is framed argumentatively and requires the adoption of certain assumptions, which are improper.

proportional to the needs of discovery, as information regarding defendant's unrelated union membership is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, AFSCME Council 4, Local 1429.

17. State the dates and times that you viewed or reviewed any audio or video recordings, or photographs, whether made by you or by anyone else, of your interaction with the Plaintiff, or any of her family members on 5-5-2018, or on any other day, and describe in detail the source and format of the recordings which you viewed, whether dash-cameras, in-car cameras, body cameras, or any other audio recordings.

OBJECTION: See General Objections. The Defendant further objects this Interrogatory as overly broad, unduly burdensome as it is not reasonably limited in time or scope and has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks information regarding attorney-client meetings and communications.

ANSWER: Objection pending.

18. State in detail the names and addresses of all people you engaged in conversations of any kind, including the times, locations, and details of all such conversations regarding the incident involving Plaintiff or her family members on 5-5-2018, providing in details all statements, verbal or written, made by you, the details of the statements and what responses received.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, see police reports.

19. Identify all written or recorded statements that you made to any person, committee, commission, investigator, or entity regarding Plaintiff, and state in detail the contents of these statements or records; for each written or recorded statement made, state the times and locations

where such statements were made, and your knowledge of where these written or recorded statements are stored or preserved.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and duplicative to the extent that it seeks information already known to the plaintiff and which is responsive to other Interrogatories, i.e. Interrogatory 19. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, see police reports and Internal Affairs investigation.

20. Set forth the names and address of each person, other than those who are parties to this litigation, who you know or believe to currently have, or had in the past, factual information regarding any incident where you interacted with Plaintiff in any manner; and, as to each individual named, a brief summary of the information and each individual's residential and/or business address.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, any witnesses, including medical providers, listed in plaintiff's damages analysis dated January 28, 2021. Plaintiff's two minor children. Investigators from the Connecticut Department of Children and Families ("DCF") and the New York Office of Children and Family Services ("OCFS"). Urmila Pal. The defendants reserve the right to add additional individuals as they become known and may depose or call individuals at trial who are not listed here.

21. Set forth the names and addresses of each person you intend to call as a witness, other than an expert, in this case and, as to each individual, state the substance of his/her anticipated testimony.

OBJECTION: See General Objections. The Defendant further objects to this Interrogatory as it seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatory 20 and is premature at this early stage

EXHIBIT 2c

10. State in detail all activities you engaged in during the twenty four (48) hours immediately preceding AND immediately following 5-5-2018, including, but not limited to, any places to which you traveled and names, and addresses of all individuals with whom you interacted, and if you ingested or utilized any alcoholic beverage, pharmaceutical, narcotic, or drugs, identify the type and amount of each substance, the time it was ingested, and who else was present at the time it was ingested.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not limited whatsoever with respect to activities and conduct of the defendant and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Specifically, information regarding defendant's unrelated activities and use of any alcoholic beverages, pharmaceuticals, narcotics, or drugs in the time prior to or after his interaction with the defendant is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Objection pending.

11. Give a detailed description of the any conversations or interactions that you engaged in or any instructions or information that you received from any member of Wilton Police Department, Town of Wilton or Wilton emergency/911 dispatchers, on 5-5-2018 regarding Plaintiff or any of her family members, and for each such conversation or interactions state the contents of such conversation or instruction, including the name, rank and address of such person(s) involved.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Additionally, the terms "conversations or interactions that you engaged in or any instructions or information that you received" and "regarding Plaintiff or any of her family members" and "such conversation or instruction" are vague and ambiguous such that they preclude a meaningful response.

ANSWER: Objection pending.

12. Give a detailed description of the events and circumstances of your interactions with Plaintiff on 5-5-5018, describing in detail your physical location at each time of such interactions to including but not limited to:

A. a detailed description of your physical contact with the Plaintiff;

B. a detailed description of all verbal statements that you made to Plaintiff and what she stated to you; and,

C. a detailed description of what you heard her state to any other police officer, ambulance personnel, or any other person; and what you heard them state to her.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory insofar as it seeks to ascertain information about “physical contact with the Plaintiff” and “all verbal statements that you made to plaintiff and what she stated to you” and “what you heard her state to any other ... person; and what you heard them state to her” as any such physical contact and statements should be known to the plaintiff. This Interrogatory is overly broad and unduly burdensome and duplicative for the additional reason that it seeks to ascertain information responsive to other Interrogatories. In addition, this Interrogatory is not reasonably limited in subject matter or time period.

ANSWER: Subject to and without waiving the foregoing objection to be provided. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with the plaintiff on May 5, 2018.

13. Give a detailed description of the events and circumstances of your interactions and conversations with any of the ambulance personnel and Norwalk Hospital personnel, including a detailed description of your physical location at each time of such interactions and what you stated, heard, overheard or witnessed during these interactions.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party’s claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding “interactions and conversations” as any such interactions and conversations should be known to the plaintiff.

ANSWER: Subject to and without waiving the foregoing objection to be provided. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with medical personnel on May 5, 2018.

14. Give a detailed description of the events, circumstances and a description of your actions and interactions with Plaintiff on 5-5-5018, which you claim show that you did not assault, threaten, batter or use unreasonable and excessive force against the Plaintiff, specifying, for each occurrence the following information:

A. when you were handcuffing, detaining, threatening, assaulting, battering or otherwise making any physical contact with Plaintiff on 5-5-2018, your exact location, posture, and all statements that you made to anyone;

B. the name and physical description of every police officer and ambulance personnel, who assisted, aided or abetted you in any manner in handcuffing, detaining, threatening, assaulting, battering or otherwise making any form of physical contact with Plaintiff, and their exact location, posture and statements made by these police officers and ambulance personnel;

C. if you claim that you did not handcuff, detain , threaten, assault, engage in battery or otherwise make any physical contact with Plaintiff on 5-5-2018, state the exact actions and statements that made to other police officers, or ambulance personnel, to prevent them from engaging in these actions upon Plaintiff;

D. everything you heard each police officer or ambulance Personnel say during the incident of 5-5-2018 , and the identity of each officer or ambulance personnel making the statement, and everything you said to each police officer and ambulance personnel;

E. and a detailed description of any physical force or resistance that you claim that Plaintiff used against you, or any other police officer or ambulance personnel on 5-5-2018, the exact locations and times that the claimed physical force or resistance, and any injuries, trauma or other harm that you sustained, or witnessed, as a result of this claimed physical force or resistance by Plaintiff.

OBJECTION: See General Objections. The Defendant further objects to the mischaracterization of his acts at issue. Additionally, this Interrogatory seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatories 11 and 12. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy. This Interrogatory is also objectionable as it is framed argumentatively and requires the adoption of certain assumptions, which are improper.

ANSWER: Objection pending.

15. State whether any audio or video recordings were made by you, or to your knowledge by anyone else, of your interaction with the Plaintiff on 5-5-2018, or on any other day, and describe in detail:

A. the date(s), times and locations where such audio or video recording(s) were made or photo(s) and/or video(s) were taken;

B. by whom the recording of photographs were made or taken;

C. whether you preserved, in the unaltered and original form, these audio or video recording(s), and photo(s) and/or video(s) and the location where these are preserved;

D. whether you made copies of these audio or video recording(s), and photo(s) and/or video(s) and the dates, times and locations when such copies were created, and the current location of these copies; and

E. Identify the names, and addresses of all other persons who currently have or have had in the past had access to these original or copies of the audio or video recording(s), and photo(s) and/or video(s).

ANSWER: To be provided.

16. State the names and addresses of all Unions that you have been a dues paying member of for the past 15 years.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad insofar as it is not reasonably limited in time or scope and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated union membership is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, to be provided for five (5) years preceding incident alleged in plaintiff's complaint.

17. State the dates and times that you viewed or reviewed any audio or video recordings, or photographs, whether made by you or by anyone else, of your interaction with the Plaintiff, or any of her family members on 5-5-2018, or on any other day, and describe in detail the source and format of the recordings which you viewed, whether dash-cameras, in-car cameras, body cameras, or any other audio recordings.

OBJECTION: See General Objections. The Defendant further objects this Interrogatory as overly broad, unduly burdensome as it is not reasonably limited in time or scope and has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks information regarding attorney-client meetings and communications.

ANSWER: Objection pending.

18. State in detail the names and addresses of all people you engaged in conversations of any kind, including the times, locations, and details of all such conversations regarding the incident involving Plaintiff or her family members on 5-5-2018, providing in details all statements, verbal or written, made by you, the details of the statements and what responses received.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, any formal written statements made or received to be provided.

19. Identify all written or recorded statements that you made to any person, committee, commission, investigator, or entity regarding Plaintiff, and state in detail the contents of these statements or records; for each written or recorded statement made, state the times and locations where such statements were made, and your knowledge of where these written or recorded statements are stored or preserved.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and duplicative to the extent that it seeks information already known to the plaintiff and which is responsive to other Interrogatories, i.e. Interrogatory 19. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, any formal written statements made or received to be provided.

20. Set forth the names and address of each person, other than those who are parties to this litigation, who you know or believe to currently have, or had in the past, factual information regarding any incident where you interacted with Plaintiff in any manner; and, as to each individual named, a brief summary of the information and each individual's residential and/or business address.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, to be provided.

21. Set forth the names and addresses of each person you intend to call as a witness, other than an expert, in this case and, as to each individual, state the substance of his/her anticipated testimony.

OBJECTION: See General Objections. The Defendant further objects to this Interrogatory as it seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatory 20 and is premature at this early stage in litigation. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy.

ANSWER: Objection pending.

22. Set forth the names and address of each person you intend to call as an expert witness in this case, and for each expert set forth

- A. the substance of all opinion(s) held;
- B. the grounds for each opinion held; and
- C. the basis for each opinion held.

OBJECTION: See General Objections. The Defendant further objects to this Interrogatory as it seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatory 20 and is premature at this early stage in litigation. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy.

ANSWER: Objection pending.

23. If you now claim or intend to claim in the future to have sustained any injury or damage, as a result of the incident involving Plaintiff on 5-5-2018, including, but not limited to, all physical, mental, psychological, emotional or economic losses, specifying for each:

- A. the injury or damage sustained, and the degree, extent or amount,
- B. the names and addresses of all medical providers with whom you have consulted, including, but not limited to any such injuries;
- C. the date(s) of each such treatment and/or consultation; and
- D. whether you are presently under the care of any doctor and/or medical professional for any condition, and
- E. If you claim you are not fully recovered, state precisely from what injuries or conditions you are presently suffering.

ANSWER: To be provided.

EXHIBIT 2d

- F. the outcome(s) of the investigations and any written report(s) of the investigations

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad insofar as it is not limited whatsoever with respect to timeframe or investigation subject matter/outcome and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated history is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, to be provided for five (5) years preceding incident alleged in plaintiff's complaint.

3. State whether you have been a party to any lawsuit, legal or administrative action, and for each provide the following details:

4. the name of the parties

5. the date, time, location of the incident(s) or activities(s) which are/were the subject of the lawsuit, legal or administrative action

6. the allegations in the lawsuit, legal or administrative action

7. whether the allegations in the lawsuit, legal or administrative action were investigated and if so the name, ranks and address of the investigator(s), and the date when the investigation(s) began and concluded

8. any statements, written or recorded, that you provided in response to the lawsuit, legal or administrative action(s)

9. the outcome(s) of the lawsuit, legal or administrative action and any written report(s)

OBJECTION: See General Objections. Defendant further objects to Interrogatories 3-9 as overly broad insofar as they are not limited whatsoever with respect to timeframe or investigation subject matter/outcome and in that they seek to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated history is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, to be provided for five (5) years preceding incident alleged in plaintiff's complaint.

10. State in detail all activities you engaged in during the twenty four (48) hours immediately preceding AND immediately following 5-5-2018, including, but not limited to, any places to which you traveled and names, and addresses of all individuals with whom you interacted, and if you ingested or utilized any alcoholic beverage, pharmaceutical, narcotic, or drugs, identify the type and amount of each substance, the time it was ingested, and who else was present at the time it was ingested.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not limited whatsoever with respect to activities and conduct of the defendant and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Specifically, information regarding defendant's unrelated activities and use of any alcoholic beverages, pharmaceuticals, narcotics, or drugs in the time prior to or after his interaction with the defendant is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Objection pending.

11. Give a detailed description of the any conversations or interactions that you engaged in or any instructions or information that you received from any member of Wilton Police Department, Town of Wilton or Wilton emergency/911 dispatchers, on 5-5-2018 regarding Plaintiff or any of her family members, and for each such conversation or interactions state the contents of such conversation or instruction, including the name, rank and address of such person(s) involved.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Additionally, the terms "conversations or interactions that you engaged in or any instructions or information that you received" and "regarding Plaintiff or any of her family members" and "such conversation or instruction" are vague and ambiguous such that they preclude a meaningful response.

ANSWER: Objection pending.

12. Give a detailed description of the events and circumstances of your interactions with Plaintiff on 5-5-5018, describing in detail your physical location at each time of such interactions to including but not limited to:

- A. a detailed description of your physical contact with the Plaintiff;
- B. a detailed description of all verbal statements that you made to Plaintiff and what she stated to you; and,
- C. a detailed description of what you heard her state to any other police officer, ambulance personnel, or any other person; and what you heard them state to her.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory insofar as it seeks to ascertain information about “physical contact with the Plaintiff” and “all verbal statements that you made to plaintiff and what she stated to you” and “what you heard her state to any other ... person; and what you heard them state to her” as any such physical contact and statements should be known to the plaintiff. This Interrogatory is overly broad and unduly burdensome and duplicative for the additional reason that it seeks to ascertain information responsive to other Interrogatories. In addition, this Interrogatory is not reasonably limited in subject matter or time period.

ANSWER: Subject to and without waiving the foregoing objection to be provided. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with the plaintiff on May 5, 2018.

13. Give a detailed description of the events and circumstances of your interactions and conversations with any of the ambulance personnel and Norwalk Hospital personnel, including a detailed description of your physical location at each time of such interactions and what you stated, heard, overheard or witnessed during these interactions.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party’s claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding “interactions and conversations” as any such interactions and conversations should be known to the plaintiff.

ANSWER: Subject to and without waiving the foregoing objection to be provided. However, the defendant does not warrant that he recalls all statements that were made and interactions he had with medical personnel on May 5, 2018.

14. Give a detailed description of the events, circumstances and a description of your actions and interactions with Plaintiff on 5-5-5018, which you claim show that you did not assault, threaten, batter or use unreasonable and excessive force against the Plaintiff, specifying, for each

occurrence the following information:

A. when you were handcuffing, detaining, threatening, assaulting, battering or otherwise making any physical contact with Plaintiff on 5-5-2018, your exact location, posture, and all statements that you made to anyone;

B. the name and physical description of every police officer and ambulance personnel, who assisted, aided or abetted you in any manner in handcuffing, detaining, threatening, assaulting, battering or otherwise making any form of physical contact with Plaintiff, and their exact location, posture and statements made by these police officers and ambulance personnel;

C. if you claim that you did not handcuff, detain , threaten, assault, engage in battery or otherwise make any physical contact with Plaintiff on 5-5-2018, state the exact actions and statements that made to other police officers, or ambulance personnel, to prevent them from engaging in these actions upon Plaintiff;

D. everything you heard each police officer or ambulance Personnel say during the incident of 5-5-208 , and the identity of each officer or ambulance personnel making the statement, and everything you said to each police officer and ambulance personnel;

E. and a detailed description of any physical force or resistance that you claim that Plaintiff used against you, or any other police officer or ambulance personnel on 5-5-2018, the exact locations and times that the claimed physical force or resistance, and any injuries, trauma or other harm that you sustained, or witnessed, as a result of this claimed physical force or resistance by Plaintiff.

OBJECTION: See General Objections. The Defendant further objects to the mischaracterization of his acts at issue. Additionally, this Interrogatory seeks a legal opinion from an unqualified person and is overly broad, unduly burdensome and duplicative to the extent that it seeks information which is responsive to other Interrogatories, i.e. Interrogatories 11 and 12. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy. This Interrogatory is

also objectionable as it is framed argumentatively and requires the adoption of certain assumptions, which are improper.

ANSWER: Objection pending.

15. State the name, telephone number and address of the person you called on 5-5-2018 from Norwalk Hospital, and state in detail the contents of your conversation with this person.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding "contents of your conversation" as any such interactions and conversations should be known to the plaintiff.

ANSWER: Subject to and without waiving the foregoing objection to be provided. However, the defendant does not warrant that she recalls all statements that were made during her May 5, 2018 telephone call.

16. State whether any audio or video recordings were made by you, or to your knowledge by anyone else, of your interaction with the Plaintiff on 5-5-2018, or on any other day, and describe in detail:

A. the date(s), times and locations where such audio or video recording(s) were made or photo(s) and/or video(s) were taken;

B. by whom the recording of photographs were made or taken;

C. whether you preserved, in the unaltered and original form, these audio or video recording(s), and photo(s) and/or video(s) and the location where these are preserved;

D. whether you made copies of these audio or video recording(s), and photo(s) and/or video(s) and the dates, times and locations when such copies were created, and the current location of these copies; and

E. Identify the names, and addresses of all other persons who currently have or have had in the past had access to these original or copies of the audio or video recording(s), and photo(s) and/or video(s).

ANSWER: To be provided.

17. State the names and addresses of all Unions that you have been a dues paying member of for the past 15 years.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad insofar as it is not reasonably limited in time or scope and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated union membership is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, to be provided for five (5) years preceding incident alleged in plaintiff's complaint.

18. State the dates and times that you viewed or reviewed any audio or video recordings, or photographs, whether made by you or by anyone else, of your interaction with the Plaintiff, or any of her family members on 5-5-2018, or on any other day, and describe in detail the source and format of the recordings which you viewed, whether dash-cameras, in-car cameras, body cameras, or any other audio recordings.

OBJECTION: See General Objections. The Defendant further objects this Interrogatory as overly broad, unduly burdensome as it is not reasonably limited in time or scope and has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks information regarding attorney-client meetings and communications.

ANSWER: Objection pending.

19. State in detail the names and addresses of all people you engaged in conversations of any kind, including the times, locations, and details of all such conversations regarding the incident involving Plaintiff or her family members on 5-5-2018, providing in details all statements, verbal or written, made by you, the details of the statements and what responses received.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or

scope.

ANSWER: Subject to and without waiving the foregoing objection, any formal written statements made or received to be provided.

20. Identify all written or recorded statements that you made to any person, committee, commission, investigator, or entity regarding Plaintiff, and state in detail the contents of these statements or records; for each written or recorded statement made, state the times and locations where such statements were made, and your knowledge of where these written or recorded statements are stored or preserved.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and duplicative to the extent that it seeks information already known to the plaintiff and which is responsive to other Interrogatories, i.e. Interrogatory 19. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, any formal written statements made or received to be provided.

21. Set forth the names and address of each person, other than those who are parties to this litigation, who you know or believe to currently have, or had in the past, factual information regarding any incident where you interacted with Plaintiff in any manner; and, as to each individual named, a brief summary of the information and each individual's residential and/or business address.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, to be provided.

22. Set forth the names and addresses of each person you intend to call as a witness, other than an expert, in this case and, as to each individual, state the substance of his/her

EXHIBIT 2e

drugs, identify the type and amount of each substance, the time it was ingested, and who else was present at the time it was ingested.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not limited whatsoever with respect to activities and conduct of the defendant and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Specifically, information regarding defendant's unrelated activities and use of any alcoholic beverages, pharmaceuticals, narcotics, or drugs in the time prior to or after his interaction with the defendant is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Objection pending.

11. Give a detailed description of the any conversations or interactions that you engaged in or any instructions or information that you received from any member of Wilton Police Department, Town of Wilton or Wilton emergency/911 dispatchers, on 5-5-2018 regarding Plaintiff or any of her family members, and for each such conversation or interactions state the contents of such conversation or instruction, including the name, rank and address of such person(s) involved.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. Additionally, the terms "conversations or interactions that you engaged in or any instructions or information that you received" and "regarding Plaintiff or any of her family members" and "such conversation or instruction" are vague and ambiguous such that they preclude a meaningful response.

ANSWER: Objection pending.

12. Give a detailed description of the events and circumstances of your interactions and conversations with any of the ambulance personnel and Norwalk Hospital personnel, including a detailed description of your physical location at each time of such interactions and what you stated, heard, overheard or witnessed during these interactions.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not reasonably limited in time or scope and it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery. The defendant further objects to this interrogatory to the extent it seeks to ascertain information regarding "interactions and conversations" as any such interactions and conversations should be known to the plaintiff. This Interrogatory is further objectionable to the extent that this defendant did not go to Norwalk Hospital.

ANSWER: Subject to and without waiving the foregoing objection not applicable as I was not present in the ambulance with plaintiff or at Norwalk Hospital on May 5, 2018 and did not have any interaction or conversations with ambulance personnel or Norwalk Hospital personnel on that day.

13. State whether any audio or video recordings were made by you, or to your knowledge by anyone else, of your interaction with the Plaintiff on 5-5-2018, or on any other day, and describe in detail:

A. the date(s), times and locations where such audio or video recording(s) were made or photo(s) and/or video(s) were taken;

B. by whom the recording of photographs were made or taken;

C. whether you preserved, in the unaltered and original form, these audio or video recording(s), and photo(s) and/or video(s) and the location where these are preserved;

D. whether you made copies of these audio or video recording(s), and photo(s) and/or video(s) and the dates, times and locations when such copies were created, and the current location of these copies; and

E. Identify the names, and addresses of all other persons who currently have or have had in the past had access to these original or copies of the audio or video recording(s), and photo(s) and/or video(s).

ANSWER: I did not make any audio or video recordings of the incidents alleged in plaintiff's complaint. The responding officers have body worn camera and dashboard camera footage of the incidents alleged in the complaint. The body worn and dashboard camera footage has been preserved in an unaltered state by the Wilton Police Department. I

did not make any copies of the relevant body worn and dashboard camera footage. Based on my personal knowledge and belief, the Wilton Police Department and our attorneys are the only persons with access to the relevant body worn and dashboard camera footage.

14. State the names and addresses of all Unions that you have been a dues paying member of for the past 15 years.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad insofar as it is not reasonably limited in time or scope and in that it seeks to ascertain information which is irrelevant to any party's claim or defense and is not proportional to the needs of discovery, as information regarding defendant's unrelated union membership is of no consequence in this case, and has no tendency to make any material fact more or less probable.

ANSWER: Subject to and without waiving the foregoing objection, not applicable as I have not been a member of a union within the last five (5) years.

15. State the dates and times that you viewed or reviewed any audio or video recordings, or photographs, whether made by you or by anyone else, of Wilton police and Wilton ambulance personnel interaction with the Plaintiff, or any of her family members on 5-5-2018, or on any other day including but not limited to the date of 4-28-2015, 6-7-2015 and 3-20-2017; describe in detail the source and format of the recording which you viewed whether dash-camera, in-car cameras, body cameras, or any other audio recordings.

OBJECTION: See General Objections. The Defendant further objects this Interrogatory as overly broad, unduly burdensome as it is not reasonably limited in time or scope and has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Interrogatory necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks information regarding attorney-client meetings and communications.

ANSWER: Objection pending.

16. State in detail the names and addresses of all people you engaged in conversations of any kind, including the times, locations, and details of all such conversations regarding the incident involving Plaintiff or her family members on 5-5-2018, providing in details all statements, verbal or written, made by you, the details of the statements and what responses received.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, not applicable as I do not recall making any formal written statements or receiving responses to any such statements related to this matter.

17. Identify all written or recorded statements that you made to any person, committee, commission, investigator, or entity regarding Plaintiff, and state in detail the contents of these statements or records; for each written or recorded statement made, state the times and locations where such statements were made, and your knowledge of where these written or recorded statements are stored or preserved.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome and duplicative to the extent that it seeks information already known to the plaintiff and which is responsive to other Interrogatories, i.e. Interrogatory 19. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

ANSWER: Subject to and without waiving the foregoing objection, not applicable as I do not recall making any formal written or recorded statements related to this matter.

18. Set forth the names and address of each person, other than those who are parties to this litigation, who you know or believe to currently have, or had in the past, factual information regarding any incident where you interacted with Plaintiff in any manner; and, as to each individual named, a brief summary of the information and each individual's residential and/or business address.

OBJECTION: See General Objection. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it seeks information already known to plaintiff. This Interrogatory is objectionable for the additional reason that the information sought can be ascertained through a review of a document itself and is not limited in time or scope.

EXHIBIT 2e

response made by defendants to plaintiff's Discovery Requests, and any assertion of the same, similar or additional objections or the provision of partial responses to these Discovery Requests does not waive any of the general objections set forth herein.

Subject to and without waiving the foregoing general objections, these defendants respond, as follows:

INTERROGATORIES

1. State dates, times and locations of all meetings, hearings or discussion, whether scheduled, unscheduled, public or private, where any of the complaints made by Plaintiff against members of Wilton police and Wilton ambulance personnel were discussed.

A. For each such meeting, discussion or hearing, identify the persons present and provide their names, addresses and official title or appointment.

B. For each such meeting, discussion or hearing produce transcripts, minutes, memoranda, audio and/or video recordings, or any other documents maintained or created as administrative or business records.

OBJECTION: See General Objections. Defendant further objects to this Interrogatory as overly broad and unduly burdensome insofar as it is not limited whatsoever with respect to timeframe or meeting type and in that it seeks to ascertain information which is already known to the plaintiff and is otherwise irrelevant to any party's claim or defense and is not proportional to the needs of discovery.

ANSWER: Objection pending.

2. Identify all insurance carriers, for each providing name, address, telephone numbers, and electronic mail addresses, which provide liability insurance of any kind for the employees, agents, and representatives of Town of Wilton. For each insurance carrier/liability policy, provide the policy documents which include the policy number, limits and scope of policy.

OBJECTION: See General Objections. Defendant further objects to this interrogatory as overly broad, unreasonably vague, unduly burdensome, and seeks information that is private, privileged from disclosure and/or wholly irrelevant, and not reasonably tailored to the needs of discovery in this matter; this breadth of background, professional and personal information regarding the Town's insurer is simply not material to any claim or defense, nor is its disclosure warranted under applicable Rules of Practice.

ANSWER: Subject to and without waiving the foregoing objection, name, address, declaration page, and policy limits to be provided.

FIRST REQUEST FOR PRODUCTION – TO TOWN OF WILTON

1. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's Complaint.

OBJECTION: See General Objections. The Defendant further objects to this Request for Production as it seeks a legal opinion from an unqualified person and is overly broad and unduly burdensome to the extent that it seeks information that has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Request for Production necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy.

ANSWER: Objection pending.

2. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's above interrogatories.

ANSWER: To be provided.

3. All written and recorded statements by any witnesses or parties identified in responses to the above interrogatories.

ANSWER: To be provided.

4. Any and all photographs, audio or video recordings identified in any of the above interrogatories.

ANSWER: To be provided.

5. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any investigator(s) contracted, retained or otherwise engaged in investigation for the purposes of this litigation.

OBJECTION: See General Objections. The Defendant further objects to this Request for Production as it seeks a legal opinion from an unqualified person and is overly broad and unduly burdensome to the extent that it seeks information that has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Request for Production necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy.

ANSWER: Objection pending.

6. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any expert(s), contracted or retained for the purpose of this litigation.

OBJECTION: See General Objections. The Defendant further objects to this Request for Production as it seeks a legal opinion from an unqualified person and is overly broad and unduly burdensome to the extent that it seeks information that has no tendency to make any material fact more or less probable. The Defendant objects for the additional reason that this Request for Production necessarily invades the attorney-client privilege and/or work product doctrine as it improperly seeks counsel's mental impressions and trial strategy.

ANSWER: Objection pending.

DEFENDANT, TOWN OF WILTON

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EXHIBIT 2e

UNITED STATES DISTRICT COURT
DISTRICT OF CONNECTICUT

NEELU PAL,

Plaintiff,

vs.

Mark Canepari, et. al.,

Defendants

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NO.:3:20-cv-00013(MPS)

December 11, 2020

**PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR
PRODUCTION FROM JOSEPH BRYSON**

Pursuant to the provisions of F.R.C.P 26, 33 and 34, Plaintiff Neelu Pal hereby requests and demands that you, Joseph Bryson, respond to the following interrogatories within thirty (30) days of the date noted above produce copies of all requested documents, materials and information as are hereinafter requested, to the plaintiff.

These interrogatories and requests for production shall be deemed continuing, so as to require prompt supplemental answers and production of all requested documents, materials and information if such are further obtained between the time answers are served and the time of trial.

As used herein, the term "document" means the original as well as any non-identical copy regardless of origin or location of any typewritten, handwritten, printed or recorded material including, but not limited to, any book, pamphlet, periodical, letter, memorandum, telegram, report, record, study, handwritten note, working paper, chart, paper, graph, index, tape, disc, data sheet, data processing card, diary, calendar, business records, address and telephone records, or any other written, recorded, transcribed, punched, taped, filmed or graphic matter, however produced or reproduced, to which you have or have had access or control.

As used herein, the term "identify" or "identification" with reference to a document means to state the date, author (and if different the signer or signers), the addressee, document (e.g., letter, memorandum, etc.) and its present or last known location and the name and address of the person having custody or control of such document. If any such document was, but is no longer in your possession or subject to your control, state the disposition made of it, the reason for such disposition and the date thereof, its present location and the name and

22. If you now claim or intend to claim in the future to have sustained any injury or damage, as a result of the incident involving Plaintiff on 5-5-2018, including, but not limited to, all physical, mental, psychological, emotional or economic losses, specifying for each:
- A. the injury or damage sustained, and the degree, extent or amount,
 - B. the names and addresses of all medical providers with whom you have consulted, including, but not limited to any such injuries;
 - C. the date(s) of each such treatment and/or consultation; and
 - D. whether you are presently under the care of any doctor and/or medical professional for any condition, and
 - E. If you claim you are not fully recovered, state precisely from what injuries or conditions you are presently suffering.

ANSWER:

FIRST REQUEST FOR PRODUCTION – TO JOSEPH BRYSON

- 1. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's Complaint.
- 2. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's above interrogatories.
- 3. All written and recorded statements made by you, and as identified in any of the above interrogatories.

4. All written and recorded statements by any witnesses or parties identified in responses to the above interrogatories.
5. Any and all photographs, audio or video recordings identified in any of the above interrogatories.
6. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any investigator(s) contracted, retained or otherwise engaged in investigation for the purposes of this litigation.
7. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any expert(s), contracted or retained for the purpose of this litigation.

CERTIFICATION

I, Joseph Bryson, certify, swear and affirm that the answers to the above interrogatories were prepared by me or at my direction with my express knowledge and authorization. I certify and swear that the answers are true, complete, accurate and correct. I certify and swear that the requested materials produced are true, complete, accurate, and unaltered copies of the original documents.

DATE: _____

Signature: _____

Name: _____

EXHIBIT 4

D. whether you are presently under the care of any doctor and/or medical professional for any condition, and

E. If you claim you are not fully recovered, state precisely from what injuries or conditions you are presently suffering.

ANSWER:

FIRST REQUEST FOR PRODUCTION – TO JOSEPH BRYSON

1. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's Complaint.
2. All documents you reviewed, referenced, consulted and/or relied on in preparing answers to the Plaintiff's above interrogatories.
3. All written and recorded statements made by you, and as identified in any of the above interrogatories.
4. All written and recorded statements by any witnesses or parties identified in responses to the above interrogatories.
5. Any and all photographs, audio or video recordings identified in any of the above interrogatories.
6. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any investigator(s) contracted, retained or otherwise engaged in investigation for the purposes of this litigation.

7. All reports, photographs, audio or video recordings provided to you, or anyone acting on your behalf, by any expert(s), contracted or retained for the purpose of this litigation.

CERTIFICATION

I, Joseph Downs, certify, swear and affirm that the answers to the above interrogatories were prepared by me or at my direction with my express knowledge and authorization. I certify and swear that the answers are true, complete, accurate and correct. I certify and swear that the requested materials produced are true, complete, accurate, and unaltered copies of the original documents.

DATE: _____

Signature: _____

Name: _____

By /s/
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David G. Hill
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