

**IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA**

PATRICK C. DESMOND AND MARY)
C. DESMOND, INDIVIDUALLY, AND)
MARY C. DESMOND, AS)
ADMINISTRATRIX OF THE ESTATE)
OF PATRICK W. DESMOND,)

Civil Action No. 10A 28641-2

Plaintiffs,)

v.)

NARCONON OF GEORGIA, INC.)
DELGADO DEVELOPMENT, INC.,)
SOVEREIGN PLACE, LLC, SOVEREIGN)
PLACE APARTMENT MANAGEMENT,)
INC., LISA CAROLINA ROBBINS, M.D.)
THE ROBBINS GROUP, INC., and)
NARCONON INTERNATIONAL,)

Defendants.)

**PLAINTIFFS' FIRST INTERROGATORIES TO
DEFENDANT LISA CAROLINA ROBBINS, M.D.**

Plaintiffs request, pursuant to O.C.G.A. § 9-11-33, that Defendant LISA CAROLINA ROBBINS, M.D., answer under oath the following interrogatories, the answers to be served upon Plaintiffs' attorney of record, Jeffrey R. Harris, Harris Penn & Lowry, LLP, 817 West Peachtree St., Suite 1105, Atlanta, Georgia, 30308, within forty-five (45) days from the date said interrogatories are served upon Defendant.

DEFINITIONS

Unless a contrary meaning appears in context, the following definitions apply:

(a) "You," "your," and "Defendant" mean Defendant Lisa Carolina Robbins, M.D., or any person or persons acting on its behalf, including, but not limited to, agents, attorneys, advisors, investigators, representatives and other persons acting on its behalf.

(b) "Document" shall mean each writing, thing, transcript, or record of any type or description that is or has been in your possession, control, or custody, or of which you have knowledge.

(c) "Communication" includes any statement or utterance, whether written or oral, made by one person to another, or in the presence of another, and any document (as defined above) delivered or sent from one person to another.

(d) "Identify" when used with respect to a document or documents, shall mean, with respect to each document, the date, a description sufficient for identification, the subject matter and content, the specific location of the document and the name and address of the person having custody of the document.

"Identify" when used with respect to a person or persons, shall mean the name, age, business and residence addresses and telephone numbers, the employer and place of employment of all such persons.

(e) Unless the context indicates otherwise, "person" shall mean the plural as well as the singular and shall include any natural person (alive or deceased), any firm, corporation, proprietorship, joint venture, trust or estate, business association, partnership, or other form of legal entity.

(f) The terms "relating to" and "relate to" mean directly or indirectly mentioning, describing, pertaining to, being connected with, or reflecting upon the subject matter of the specific request.

(g) When appropriate, the singular shall encompass the plural, and vice versa.

INSTRUCTIONS

The following Instructions apply to all Interrogatories:

- (a) Each interrogatory is to be answered separately and specifically.
- (b) Plaintiff hereby requests, pursuant to O.C.G.A. § 9-11-26, that after answering these interrogatories, you supplement or correct any responses later learned to be incomplete or incorrect immediately upon learning that a prior response was incomplete or incorrect.
- (c) All information requested herein is to be set forth if it is in the possession or control of, or is available or accessible to, you or any of your agents, consultants, counsel, investigators, representatives or any other person or persons acting for you or on your behalf.
- (d) If you cannot answer certain of the following interrogatories in full after exercising due diligence to secure the information to do so, answer to the extent possible and explain your inability to provide a complete answer. State whatever information or knowledge you have about the unanswered portion of any interrogatory.
- (e) If any information called for by an interrogatory is withheld on the basis of a claim of privilege, set forth the nature of the claimed privilege and the nature of the information with respect to which it is claimed.
- (f) Whenever an interrogatory requests the identification of a document, the answer shall state the name, address, position, and organization of the author and each recipient of the document, the custodian of the document, the date of the document, and a brief description of the subject matter of the document.
- (g) Whenever an interrogatory requests the identity of a person, state his or her full name, present or last known address, telephone number, and position of employment at the time in question.
- (h) Whenever an interrogatory requests the identity of an entity, state its name, address, telephone number, and the type of business in which the entity engages.

(i) Whenever an interrogatory seeks a description of an act, transaction, occurrence, dealing or instance, state the date when it occurred, the place where it occurred, the identity of each persons participating therein, the person on whose behalf each such person participated or purported to participate, the nature and substance of all conversation or oral communication occurring during, or in connection with the act, transaction, occurrence, dealing or instance, and identify all documents referring thereto or reflecting the act, transaction, occurrence, dealing or instance.

(j) Whenever an interrogatory asks for a date, state the exact day, month and year, if ascertainable, or, if not, the best approximation thereof.

INTERROGATORIES

1.

Please state your full name, address, date of birth, present employer, and occupation.

2.

State the name, address, home and work telephone numbers, and employers of any person who, to your knowledge, information or belief, has some knowledge of any fact or circumstance relating to Patrick Desmond's enrollment at Narconon of Georgia and/or person with knowledge of any fact or circumstances relating to this lawsuit.

3.

Please identify each statement (oral, written, recorded, court or deposition transcript, etc.) made by any person with knowledge relevant to this lawsuit. In doing so, please identify the date each statement was made, the name of the person making the statement, and the name and address of each person having possession, custody or control of each statement.

4.

Please identify every civil action to which you have been a party other than this civil action.

5.

At the time of the incident giving rise to this lawsuit, did a policy or policies of liability insurance, including any excess liability policies, cover you in May 2008? If your answer is in the affirmative, state for each policy:

- (a) The name and address of the insurer and insured;
- (b) Policy number and effective dates of coverage; and
- (c) Limits of liability.

6.

Has your license to practice medicine ever been revoked, suspended or restricted? If so, please describe in detail.

7.

Who or what entity pays your malpractice premiums and who or what entities paid your malpractice premiums in June 2008?

8.

State your role, including job title and duties, at Narconon of Georgia. Please identify the dates in which you began working for or with Narconon of Georgia.

9.

Please identify each institution of higher learning you attended, and specify:

- (a) The dates you attended each institution;
- (b) Your declared major area of study at each institution; and

(c) The type of degree and date you received said degree from each institution.

10.

Please state whether you are certified by any medical accreditation board in any medical discipline and for each certification, please state:

- (a) The medical discipline in which you are certified;
- (b) The course of study you undertook to obtain certification;
- (c) The date you obtained your certification; and
- (d) The accrediting entity that issued your certification.

11.

Please set forth each jurisdiction in which you are licensed to practice medicine and for each jurisdiction, please state:

- (a) The date you were admitted to practice in that jurisdiction;
- (b) Whether you were admitted upon examination or reciprocity; and
- (c) Whether there exists any restriction upon your right to practice medicine.

12.

As to each date that consultation, medical care, treatment or diagnosis was rendered to Patrick Desmond by you, state the date of its occurrence, the type of care provided, whether any records of any type exist relative to said treatment and the name, address, and telephone number of the present custodian of said records.

13.

Did any other medical doctor assist you, consult with you, or render a medical opinion relative to any treatment, care, or diagnosis rendered by you to Patrick Desmond? If so, state as to each such person, his name and address, the reason for your seeking that consultation

or assistance, and the dates each such consultation or assistance was rendered, and provide the details of such consultation.

14.

Please state whether there was any peer review conducted, or if you were charged with any violation of any policy and/or protocol arising out of the incident described in Plaintiff's Complaint. If so, what was the nature of the review and/or charge, your response, and whether or not there was a written report prepared by anyone regarding such review and/or charge, including in your response the name, title, and address of the person and/or entity who conducted such review and/or charge.

15.

State the name, address and telephone number of all persons, including experts, whom you expect to call or may call as witnesses at trial. With respect to each such person, please state:

- (a) The specific subject matter on which you expect such expert to testify;
- (b) The substance of the facts, opinions and conclusions to which you expect such expert to testify;
- (c) A summary of the factual grounds for each such opinion or conclusion; and
- (d) whether any such person has prepared or provided you with a written or recorded statement or report concerning their investigation, and if so, the name and address of all persons who have a copy of each such report or statement.

16.

Please list the names, addresses and telephone numbers of all persons having

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knowledge of relevant information, facts or circumstances in this case, known to this Defendant.

17.

Do you contend that the Plaintiff has made any admission against interest in this case? If so, and the purported admission was oral, please state the following:

- (a) The date and place where the admission was made;
- (b) The exact statement which purportedly constitutes the admission made by the Plaintiffs;
and
- (c) The name, address and telephone number of each such witness to said purported admissions.

18.

If the purported admission was made by the Plaintiff in writing, please state the following:

- (a) The date of the document;
- (b) A summary of the contents which constitute the purported admission; and
- (c) The name and address of the author of the document, and the name, address, and telephone number of the custodian of the document.

19.

Please state in detail the factual basis for each and every defense you raised in your Answer to the Complaint and identify any written materials, textbooks, papers or other instruments you intend to rely on at any trial of this matter.

20.

Please state what training and/or credentialing process was required for you to be named the medical director of Narconon of Georgia.

21.

If any defendant is improperly identified, give the proper identification and state whether or not you will accept service of an amended summons and complaint reflecting the information furnished by you in answer thereto.

22.

Identify all publications, including but not limited to papers, journal articles, letters to the editor, textbooks, symposiums, etc., which you authored or contributed to, including the title of the work, the name of the periodical or book in which it was printed, the pages you wrote and the date of its printing.

23.

Identify by author, title, and year of publication, every textbook in drug addiction and treatment, in your office from 2004 - present.

24.

Identify by author, title, and year of publication, every textbook in drug addiction and treatment which you regularly referred to and/or relied upon from 2004 – present.

25.

Set forth the name of each medical journal you subscribed to from 2004 - present.

26.

Set forth the name of each medical journal you read regularly during the period from 2004 – present.

27.

Were you associated, or in partnership with any other medical practitioner at the time of the occurrence which is the subject of this action?

28.

Identify each and every contract or other document establishing or otherwise referring to the relationship between you and Narconon of Georgia.

29.

Have you, or anyone on your behalf, conducted any investigations of the treatment or examination which is the subject matter of the Complaint?

30.

If your answer to Interrogatory No. 29 is in the affirmative, please state:

- (a) The name, address, and employer of all persons who conducted any investigations;
- (b) The dates of the investigations;
- (c) The dates of any reports of any investigations and the identity of the persons who have possession thereof;
- (d) Please consider this a request to produce your investigation reports, except those portions which are protected from discovery by Georgia Rules of Civil Procedure.

This the 17th day of May, 2010.

HARRIS PENN & LOWRY, LLP



JEFFREY R. HARRIS

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FILED IN THIS OFFICE
THIS 19 DAY OF May 2010
17 May

U.S. District Court, E.D. of Georgia

Georgia Bar No: 330315
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REBECCA FRANKLIN
Georgia Bar No. 141350

Attorneys for Plaintiff

CERTIFICATE OF SERVICE

This is to certify that I have this day submitted **PLAINTIFFS' FIRST INTERROGATORIES TO DEFENDANT LISA CAROLINA ROBBINS, M.D.** to a representative of Dial Services, to serve them along with a Summons and Complaint.

This the 14 day of May, 2010.

HARRIS PENN & LOWRY, LLP



JED B. MANTON

Ga. Bar No. 868587

JEFFREY R. HARRIS

Ga. Bar No: 330315