

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. 10A28641-2

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 REQUEST FOR PRODUCTION OF DOCUMENTS TO  
DEFENDANT NARCONON OF GEORGIA, INC.**

Plaintiffs request that Defendant NARCONON OF GEORGIA, INC., pursuant to O.C.G.A. § 9-11-34(c), produce for inspection and copying the following documents on the forty-fifth (45<sup>th</sup>) day following service of these Requests for Production of Documents at 5:00 p.m. in the offices of Harris Penn & Lowry, LLP, 817 West Peachtree Street, Suite 1105, Atlanta, Georgia, 30308. In lieu of production, the documents may be mailed to the above-referenced address forty-five (45) days from receipt.

**DEFINITIONS**

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

(a) "You," "your," and "Defendant" mean Narconon of Georgia, Inc., and 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.

**REQUESTS**

1.

Please produce all contracts or agreements of any kind between you and any of the other defendants in this case.

2.

Please produce all documents sent by you to the drug court in Florida that describe in any way your qualifications to engage in drug or alcohol rehabilitation activities.

3.

Please produce all documents or other materials provided to drug courts and/or potential patients who required out-patient treatment.

4.

All documents sent by you to any court, in any jurisdiction, that describe in any way your qualifications to engage in drug or alcohol rehabilitations activities.

5.

Please produce all insurance policies that may provide coverage for the events described in the Complaint.

6.

Please produce full and complete copies of all security procedures and policies that address providing security for your patients.

7.

Please produce all bed checks or other records that reflect the location of Patrick W. Desmond for each day that he was a patient of Narconon of Georgia, including June 10, 2008, and June 11, 2008.

8.

Please produce true and correct copies of all licenses issued to you by the State of Georgia or any other government entity from 2004 to present certifying you as a medical or drug rehabilitation facility.

9.

All documents which reflect any investigation into the circumstances of the death of Patrick Desmond.

10.

All witness statements or interviews conducted with any person who has knowledge of the circumstances of the death of Patrick Desmond.

11.

All records regarding the care and treatment received by Patrick Desmond provided by you and/or any Defendant in this case.

12.

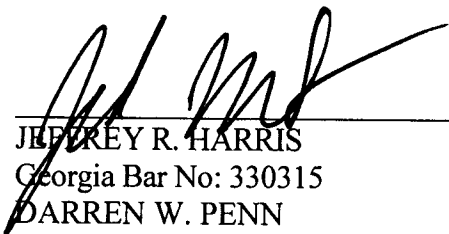
All marketing materials provided to patients that reflect the performance of drug rehabilitation services by any Defendant in this case.

13.

All documents sent by you, or on your behalf, to the Georgia Department of Human Resources or any other entity regulating your business which purports to reflect the type of drug rehabilitation services performed by you or any Defendant in this case.

This the 10<sup>th</sup> day of May, 2010.

HARRIS PENN & LOWRY, LLP



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*Attorneys for Plaintiff*


FILED IN THIS OFFICE  
THIS 19 DAY OF May 20 10  
*12/20/10*

**CERTIFICATE OF SERVICE**

This is to certify that I have this day submitted **PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT NARCONON OF GEORGIA, INC.** to a representative of Dial Services, to serve them along with a Summons and Complaint.

This the 4<sup>th</sup> day of May, 2010.

HARRIS PENN & LOWRY, LLP

  
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JEFF D. MANTON  
Ga. Bar No. 868587  
JEFFREY R. HARRIS  
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