

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,)

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.)

Civil Action No. 10A 28641-2

**PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT SOVEREIGN PLACE APARTMENT MANAGEMENT, INC.**

Plaintiffs request that Defendant SOVEREIGN PLACE APARTMENT
MANAGEMENT, INC., pursuant to O.C.G.A. § 9-11-34(c), produce for inspection and copying
the following documents on the forty-fifth (45th) 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 Sovereign Place Apartment Management, 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 between you and any of the listed parties in this action that were in effect from 2005 to present.

2.

Please produce the declaration page of any insurance policies that may provide coverage to this action.

3.

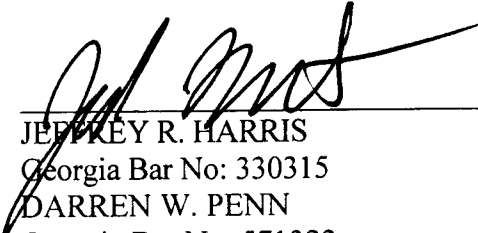
Please produce full and complete copies of all security procedures and policies that address providing security at One Sovereign Place Apartments.

4.

Please produce all photographs or video of the property at One Sovereign Place Apartments on June 10, 2008, and June 11, 2008.

This the 15 day of May, 2010.

HARRIS PENN & LOWRY, LLP



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Attorneys for Plaintiff

CERTIFICATE OF SERVICE


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

This the 18th day of May, 2010.

HARRIS PENN & LOWRY, LLP



JEFFREY R. HARRIS
Ga. Bar No. 868587
JEFFREY R. HARRIS
Ga. Bar No: 330315

FILED IN THIS OFFICE
THIS 19 DAY OF May 2010


Clerk, State Court, DeKalb County