

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
PATRIC, W. DESMOND,

CIVIL ACTION

FILE NO. 10 A 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.

**RESPONSES OF LISA CAROLINA ROBBINS, M.D.
TO PLAINTIFFS' FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW Defendant LISA CAROLINA ROBBINS, M.D. and responds to Plaintiffs' First Request for Production of Documents as follows:

INITIAL OBJECTION

Defendant initially objects to Plaintiffs' purported instructions and definitions in the within matter and refuses to be bound by same. Defendant will respond to Plaintiff's discovery as required under the Civil Practice Act of Georgia and according to his interpretation thereof and not be bound by any other purported instructions or definitions.

1.

Please produce all copies of policies of liability insurance, including excess liability policies which were in effect for you and/or your practice in May, 2010.

RESPONSE:

See attached certification of Medical Professional Liability Coverage.

2.

Please produce all medical records, including daily progress notes, relating to the care and treatment of Patrick Desmond at Narconon of Georgia.

RESPONSE:

See attached.

3.

Please produce all policies and procedures relating to Narconon of Georgia in your possession, custody or control.

RESPONSE:

None.

4.

Any and all statements made by any other party or witness.

RESPONSE:

None.

5.

Any and all claims or investigation files or reports prepared by or for defendant or by or for defendant's representative excluding information protected from discovery under O.C.G.A. §9-11-33.

RESPONSE:

None.

6.

All original documents responsive to plaintiffs' Interrogatories.

RESPONSE:

See office records produced.

7.

All reports, notes or memoranda prepared and/or signed by any expert, medical or otherwise, which defendant intends to call at trial.

RESPONSE:

None.

8.

A copy of your most recent curriculum vitae.

RESPONSE:

See attached.

9.

All documents or other items defendant intends to introduce or otherwise utilize at the time of trial.

RESPONSE:

Objected to as violative of Defendant's attorney work product.

10.

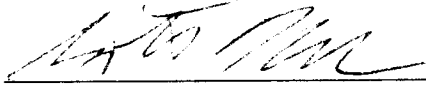
Any and all documents identifying or relating to your relationship to the other defendants in this action, including but not limited to, any Contract(s) you had with Narconon of Georgia.

RESPONSE:

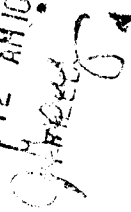
See attached.

Respectfully submitted this 6th day of July, 2010.

WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC



Robert G. Tanner
State Bar No. 697650
Scott P. Kerew
State Bar No. 416629
Attorney for Defendants Lisa Carolina Robbins, M.D.
and The Robbins Group, Inc.

STATE COURT OF
DEKALB COUNTY, GA
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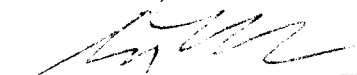
CERTIFICATE OF SERVICE

This is to certify that I have this day served a copy of the within and foregoing pleading on opposing counsel by mailing a copy of same in the U.S. Mail properly stamped and addressed to:

Darren W. Penn, Esq.
Harris Penn & Lowry, LLP
817 W. Peachtree Street, Suite 1105
Atlanta, Georgia 30308

This 6 day of July, 2010

WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC



Robert G. Tanner
State Bar No. 697650
Scott P. Kerew
State Bar No. 416629
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