

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,

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.

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CIVIL ACTION
FILE NO. 10 A 28641 2

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

COMES NOW Defendant LISA CAROLINA ROBBINS, M.D. and responds to
Plaintiffs' First Interrogatories as follows:

INITIAL OBJECTION

Defendant initially objects to Plaintiff's 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 state your full name, address, date of birth, present employer, and occupation.

RESPONSE:

See CV.

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.

RESPONSE:

None, other than those individuals who may be shown in Defendant's office records.

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.

RESPONSE:

None.

4.

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

RESPONSE:

Defendant objects to Interrogatory Number 4 on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of the foregoing objections, Defendant states that she has been a party to two prior civil suits: Brooks v. Robbins and Darden v. Robbins.

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.

RESPONSE:

Defendant objects to Interrogatory Number 5 on the grounds that it is not reasonably calculated to lead to the discovery of admissible evidence.

Without waiver of the foregoing objections, Defendant states that in May 2008 she was covered by a policy with MAG Mutual Insurance Company. Her limits on liability under this policy were 1,000,000/3,000,000.

6.

Has your license to practice medicine ever been revoked, suspended or restricted?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

RESPONSE:

No.

7.

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

RESPONSE:

Defendant pays her own premiums.

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.

RESPONSE:

Defendant Robbins began working as an independent contractor with Narconon sometime in the early 2000's. The role was to perform physical examinations and take medical histories in order to determine whether individuals were suitable candidates for the program. During the course of the program, if the individual had medical (as opposed to emotional or psychiatric problems) Defendant was available to see them.

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.

RESPONSE:

See CV.

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.

RESPONSE:

See CV.

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.

RESPONSE:

See CV.

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.

RESPONSE:

See Defendant's office notes which are produced in their entirety.

12.

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.

RESPONSE:

None, other than to the extent that assistance may be considered to involved matters such as a lab performing test on blood. All such "assistance" is shown in the medical records of the deceased.

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.

RESPONSE:

No.

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.

RESPONSE:

Unknown at this time.

16.

Please list the names, addresses and telephone numbers of all persons having knowledge of relevant information, facts or circumstances in this case, known to this Defendant.

RESPONSE:

Defendant does not know of anyone who would have relevant knowledge.

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.

RESPONSE:

No such statement known to these Defendants.

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.

RESPONSE:

No such statement known to these Defendants.

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.

RESPONSE:

The basis for the Defendant's first affirmative defense is that there was no physician/patient relationship. Defendant never saw the deceased at his request. Rather, he was seen at the request and for the benefit of Narconon. Narconon paid for the visit. Defendant was to obtain information for them which they could use for their benefit. The only other time which Defendant had any contact with the deceased involved giving him some samples for a cold. As such, there was no physician/patient relationship.

The statute of limitation defense has to do with any claim for negligence in connection with services provided in 2007. Clearly, those would be barred by the applicable statute of limitation as more than 2 years intervened between that treatment and the death of the patient.

20.

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

RESPONSE:

To Defendant's knowledge, she was never named to be medical director of Narconon.

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.

RESPONSE:

No such contention made.

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.

RESPONSE:

See CV.

23.

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

RESPONSE:

Objected to as unduly burdensome, as harassing, and as forcing this Defendant to unnecessary expense.

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.

RESPONSE:

None.

25.

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

RESPONSE:

Objected to as unduly burdensome, as harassing, and as forcing this Defendant to unnecessary expense.

26.

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

RESPONSE:

Objected to as unduly burdensome, as harassing, and as forcing this Defendant to unnecessary expense.

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?

RESPONSE:

No.

28.

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

RESPONSE:

See Services Agreement provided in response to Request to Produce.

29.

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

RESPONSE:

Defendant has not conducted any investigation. Any investigation has been conducted by her attorney.

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 request to produce your investigation reports, except those portions which are protected from discovery by Georgia Rules of Civil Procedure.

RESPONSE:

Defendant objects to and refuses to disclose the nature of investigation conducted on her and its behalf by Defendant's attorney.

Respectfully submitted this 6th day of July, 2010.

WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC



Robert G. Tanner
State Bar No. 697650
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STATE COURT OF
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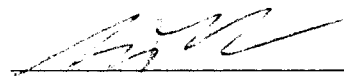
CERTIFICATE OF SERVICE

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 6th day of July, 2010

WEINBERG, WHEELER, HUDGINS, GUNN
& DIAL, LLC



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