



any issue in this matter? Please state "yes" or "no." If you answer is in any way in the affirmative, identify the name of the person who gave the statement and the name, address, and telephone number of anyone who has possession, custody, or control of such statement, transcript or summary of such statement.

**RESPONSE:**

No.

2.

Identify any photographs, motion pictures, videotapes, or any other type of demonstrative or graphic evidence concerning Patrick W. Desmond's actions or whereabouts on June 10, 2008, and June 11, 2008. As to each item, please state the nature of such item; how many of such items exist (for example, 15 photographs); the name, address and employer of the person making/supplying such item; and the identity of the person who presently possesses each such item.

**RESPONSE:**

The only records identified in this Interrogatory would be the office records. A complete copy has been provided in response to Request to Produce.

3.

Please describe the specific date you first learned of the subject incident in any way, how you first came to be aware the subject incident had occurred, who first provided you with any information about the subject incident, and what information you were provided at that time.

**RESPONSE:**

Defendant first learned of the incident when served with papers.

4.

State the following information concerning any and all liability insurance, including excess or umbrella coverage or coverage by any other description, which does or may afford insurance coverage to these defendants for the claims made in this lawsuit;

- a. name of each insurance company issuing policy;
- b. applicable liability limits concerning each policy;
- c. names of all persons and/or companies insured under each policy;
- d. names of the person(s) paying premiums with respect to each policy;
- e. policy number of each policy;
- f. types of insurance coverage carried;
- g. whether or not the defense of this action has been tendered to any such insurer;
- h. whether defense has been accepted by each such insurer to whom defense has been tendered;
- i. whether these defendants have made any claims under said policy or policies as a result of the occurrence herein;
- j. the nature, extent, and amount of any such claim or claims with said insurer(s);
- k. whether those claims have been paid by said insurer(s) and the amount of said payment(s); and
- l. your insurer's response or reaction with respect to the request that it defend this lawsuit and pay any damages assessed, pursuant to the policy provisions.

**RESPONSE:**

Defendant states that it does not have its own insurance coverage. Lisa Robbins, MD is covered under the policy attached to responses to Requests for Production.

5.

Please identify any person that these defendants expect to call as a testifying expert witness, whether live, by affidavit, or by deposition, in connection with any trial, hearing, or motion, as well as any other evidentiary hearing in this action. For each such expert, please identify the subject matter of which the person is expected to testify, a summary of the grounds for such opinions, and the identity of all documents and professional references upon which such person may base his or her testimony and opinions.

**RESPONSE:**

Unknown at this time.

Respectfully submitted this 6<sup>th</sup> day of July, 2010.

WEINBERG, WHEELER, HUDGINS, GUNN  
& DIAL, LLC



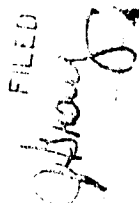
---

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.

2010 JUL 12 AM 10:38

FILED




**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<sup>th</sup> 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 Lisa Carolina Robbins, MD  
and The Robbins Group, Inc.

3344 Peachtree Street  
Suite 2400  
Atlanta, Georgia 30326  
(404) 876-2700