

IN THE STATE COURT OF DEKALB COUNTY  
STATE OF GEORGIA

ORIGINAL

PATRICK C. DESMOND, MARY C.  
DESMOND, Individually, and MARY C.  
DESMOND, as Administratrix of the Estate  
of PATRICK W. DESMOND

Plaintiffs,

v.

NARCONON OF GEORGIA, INC.,  
NARCONON INTERNATIONAL,  
DELGADO DEVELOPMENT, INC.,  
SOVEREIGN PLACE, LLC, SOVEREIGN  
PLACE APARTMENT MANAGEMENT,  
INC., LISA CAROLINA ROBBINS, M.D.,  
and THE ROBBINS GROUP, INC.

Defendants.

Civil Action File No: 10A28641-2

**MOTION TO COMPEL**

COMES NOW Narconon of Georgia, Inc., named Defendant herein, and, pursuant to O.C.G.A. § 9-11-37, moves this Court to compel Plaintiffs to provide supplemental discovery responses, showing the court as follows:

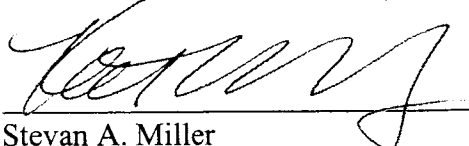
Narconon of Georgia, Inc. (“NNGA”) served interrogatories on Plaintiffs seeking discoverable information. Plaintiffs failed to provide it. Therefore, an order compelling them to do so is necessary and appropriate. NNGA asked Plaintiffs to specify the acts of negligence of the Defendants (Interrogatory No. 6); itemize contended damages (Interrogatories Nos. 7 and 24); identify contracts among the parties (Interrogatory No. 12); particularize the alleged misrepresentations made by the Defendants (Interrogatory No. 25); and execute releases so they could get education records of Plaintiff’s decedent (Interrogatory No. 27). (Plaintiffs’ Responses

to Defendant Narconon of Georgia, Inc.'s First Interrogatories are attached hereto as Exhibit "A".) When the information initially was not provided, NNGA followed up by letter. Uniform State Court Rule 6.4. (Letter of October 13, 2010 from Kathryn S. Whitlock to Jeffrey R. Harris and Rebecca Franklin, a true and accurate copy of which is attached hereto as Exhibit "B"; letter of May 4, 2011 from Kathryn S. Whitlock to Jeffrey R. Harris and Rebecca Franklin, a true and accurate copy of which is attached hereto as Exhibit "C"). Plaintiffs still failed and refused to provide the information, even though it is relevant, not privileged, and discoverable. Therefore, the Court should order it produced and should require Plaintiffs to bear the costs associated with this Motion.

WHEREFORE, for the above and foregoing reasons, Defendant Narconon of Georgia, Inc. prays that its Motion be sustained and that Plaintiffs be compelled to provide supplemental discovery responses as specified above and that Plaintiffs be required to reimburse Defendants for attorney's fees and expenses incurred in preparing and filing this Motion.

Respectfully submitted this 26<sup>th</sup> day of May, 2011.

DREW ECKL & FARNHAM, LLP



Stevan A. Miller

**Georgia Bar No. 508375**

Kathryn S. Whitlock

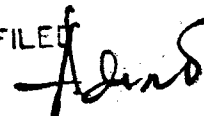
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*Attorneys for Defendant  
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STATE COURT OF  
DEKALB COUNTY, GA

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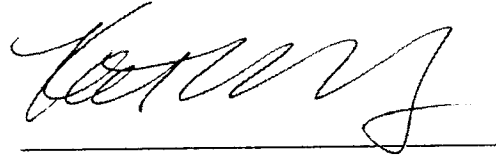




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This 26<sup>th</sup> day of May, 2011.

DREW ECKL & FARNHAM, LLP



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Kathryn S. Whitlock  
**Georgia Bar No. 756233**

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