

IN THE STATE COURT OF DEKALB COUNTY
STATE OF GEORGIA

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.

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ORIGINAL

Civil Action File No: 10A28641-2

**DEFENDANT NARCONON OF GEORGIA, INC.'S RESPONSES
AND OBJECTIONS TO PLAINTIFFS' THIRD INTERROGATORIES**

COMES NOW Narconon of Georgia, Inc. ("NN Ga.") and, pursuant to O.C.G.A. §§9-11-26 and 9-11-33, responds to Plaintiffs' Third Interrogatories as follows:

This Defendant objects to Plaintiffs' prefatory definitions and instructions insofar as they seek to impose upon this Defendant a greater duty than that imposed by the Georgia Civil Practice Act. This Defendant will respond to Plaintiffs' discovery as required by Georgia law.

1.

Identify all individuals who provided transportation on behalf of Narconon, Delgado Development, Maria Delgado and/or Don Delgado to students enrolled in Narconon in 2007-2008.

RESPONSE:

This Defendant does not know all persons who provided transportation on behalf of Delgado Development, Maria Delgado and/or Don Delgado, but shows that the following persons drove students from Narconon to appointments and lunch while they were at Narconon during the day and/or drove Narconon vans between Narconon and housing in the years 2007-2008: Mary Rieser, Domaso Delgado, Debra Toth, Kimberly Stinson, Martin Cohen, Dexter Smith, Anothony Arnold, Brenda Evans, Glen Robinson, Raul Salas, Jimmy Cox, Michael Pickett, Robert Lynch, Adam Turen, Johnnie Carter, Michael Layton, Charles Lovelady, Mark Webb, Maria Delgado, Darrell Hall, Hubert Bullard, Gene Floyd.

2.

Identify all corporate entities who provided transportation services on behalf of Narconon, Delgado Development, Maria Delgado and/or Don Delgado to students enrolled in Narconon in 2007-2008.

RESPONSE:

This Defendant does not know all corporate entities who provided transportation on behalf of Delgado Development, Maria Delgado and/or Don Delgado, but shows that Delgado Development and Narconon of Georgia provided transportation to students in the years 2007-2008.

3.

Identify all individuals affiliated with Narconon International who conducted an investigation and/or inspection of the Narconon of Georgia facility as a result of Patrick Desmond's death and/or within sixty (60) days after Patrick Desmond's death, and identify the date(s) of those investigations and/or inspections.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information protected by the attorney-client and/or work product privileges. Subject to and without waiving the foregoing objections, Barbara Dunn and Jette McGregor, both in 2008.

4.

Identify all individuals who served as housing supervisor, housing interns and/or housing monitors who were compensated in any way by Narconon, Delgado Development, Maria Delgado and/or Delgado Development in 2007-2008.

RESPONSE:

NN Ga. did not employ anyone to be a housing supervisors, housing intern and/or housing monitor in 2007 and 2008. Further, this Defendant did not compensate anyone for fulfilling those jobs. .

5.

Please state whether Patrick Desmond was being compensated by any individual and/or entity for any services (including but not limited to services associated with housing or the sauna program), in 2007-2008; and if so, please identify the person and/or entity who provided said compensation and the services for which Patrick Desmond was being compensated.

RESPONSE:

This Defendant does not have this information for any entity other than itself. This Defendant states that it did pay Patrick Desmond a trainee stipend per week when he helped monitor sauna, assisting the nurse that was in charge after he had completed the Narconon program.

6.

Identify by name and location all apartment complexes and/or housing facilities where female students enrolled in Narconon resided in 2007-2008.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states that students, both male and female, lived where they chose to. Some lived at their usual homes, some lived in Delgado Development Apartments and some lived elsewhere. NN Ga. had no control or authority over this. It did recommend Delgado Development, as well as other housing programs such as Westco, and R and A, to its students, and it is aware that many of its students lived there in 2007 and 2008. It is also believed that some female students lived at One Sovereign Place, Versailles, Hunter's Glen, Berkely Landing, Bristol Point, Valencia, Extended Stay, Howard Johnson and private homes.

7.

Identify by name and location all apartment complexes and/or housing facilities where students enrolled in Narconon resided in 2007-2008.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states that students, both male and female, lived where they chose to. Some lived at their usual homes, some lived in Delgado Development Apartments and some lived elsewhere. NN Ga. had no

control or authority over this. It did recommend Delgado Development, as well as other housing programs such as Westco and R and A, to its students, and it is aware that many of its students lived there in 2007 and 2008. It is also believed that some students lived at One Sovereign Place, Versailles, Hunter's Glen, Berkely Landing, Bristol Point, Valencia, Extended Stay, Howard Johnson and private homes.

8.

Identify all individuals who were authorized to access any locking cabinet devoted to vitamin and mineral storage and/or other medicine storage in 2007-2008.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad, unduly burdensome and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states that the persons who had access to storage of vitamins and minerals and medicines were Veronica Medlock, LPN, Linda Hall, RN, Mary Lou Schmidt RN, Tracy Stepler, Mary Rieser, Larry Chorvas, Allison Reippe, Johnnie Carter, Don Delgado, and agency nurses supplied by a nursing agency at the sauna. The monitors at sauna had access to the room where the vitamins were, but only got student folders out of the cabinet. They did not handle the vitamins.

9.

Identify the location of all locking cabinets devoted to vitamin and mineral storage and/or any other medicine storage in 2007-2008.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad, unduly burdensome and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states that it had safes at the NN Ga treatment center at 5688 Peachtree Parkway, Norcross, Ga. 30092 and at the Narconon New Life Detoxification Program 6487 Peachtree Industrial Blvd, Doraville, GA 30067.

10.

Identify all physicians to which Narconon has ever referred students for initial physical assessments and/or follow-up medical visits.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states that, at times, NN Ga refers a student to a walk-in clinic for a minor emergency such as a few stitches or to the emergency room of Northside or Gwinnett Hospitals, but it does not know the names of specific doctors at these facilities. In 2007 and 2008, it referred students to Dr. Robert Shanks, Dr. Lisa Robbins, and Dr. Darwin Hege.

11.

Identify every Medical Director of Narconon of Georgia and specify the dates by which those individuals served as Medical Director.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states Dr. Lisa Robbins was the Medical Director in 2007 and 2008.

12.

Identify each of Patrick Desmond's Case Supervisors and Course Supervisors while enrolled in the Narconon program.

RESPONSE:

Case Supervisors: Tracy Stepler and Mary Reiser; Course Supervisors: Abby Bailey, Gene Adams and Joe Sessions

13.

Identify all individuals known to you who were interviewed by any person or entity as part of The DeKalb County Medical Examiner's Investigation relating to the death of Patrick Desmond, and please identify the date and location of such interviews.

RESPONSE:

Other than those persons identified in the Medical Examiner's Report, this Defendant is aware of no such persons.

14.

Identify all "Health Practice Lawyers" associated with Narconon from 2006-current day, and describe in detail their role in the Narconon program.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad, unduly burdensome and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This Defendant further objects to this Interrogatory inasmuch as it is vague and ambiguous.

15.

Identify each accreditation agency that has approved Narconon of Georgia and the dates of such accreditation .

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states it is licensed by the State of Georgia and it is not required to be accredited by any group or agency. Thus, it has never applied for accreditation.

16.

Please state whether Narconon of Georgia has ever lost its accreditation with any accreditation agency, and if so, please identify the agency and the dates of accreditation.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states it is licensed by the State of Georgia and it is not required to be accredited by any group or agency. Thus, it has never applied for, been denied or lost accreditation

17.

Identify Narconon's governing body in place in 2007-2008.

RESPONSE:

Board of Directors

18.

Identify all current members of the Board of Directors of Narconon of Georgia and all members of the Board of Directors of Narconon of Georgia in 2007-2008.

RESPONSE:

This Defendant objects to this Interrogatory inasmuch as it is overbroad and seeks information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving the foregoing objections, this Defendant states 2007-2008: Mary Reiser, Robert Schmidt, and Debra McIntyre.

19.

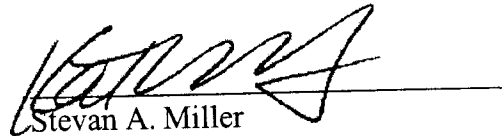
Identify the date which you, and/or any of your agents and/or representatives, anticipated litigation arising out of the death of Patrick Desmond.

RESPONSE:

Considering the litigiousness of our society, NN Ga anticipated the possibility for litigation arising out of the death of Patrick Desmond at the time it learned that he had died.

This the 15th day of December, 2010.

DREW ECKL & FARNHAM, LLP



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STATE COURT OF
DEKALB COUNTY, GA.
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Clerk