

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, NN GA states that it did not keep records of personnel in the form set out in Exhibit A. NN GA cannot remember all the personnel, but, pursuant to the terms and conditions of the protective orders entered in this case, to the best of its knowledge, information and belief, the personnel were as follows:

Counselor /Therapist/Social Worker (certified or licensed): Joan Daniel

Counselor (not licensed or certified): Scott Flickenger, Abby Bailey, Brenda Evans

Registered Nurse: Linda Hall

Administrative Personnel: Kurtis Money, Joscelyn Rieser, Jeni Hilton, Jordon Foley, Debra Toth, Maria Delgado

Program Director: Mary Rieser

Other: Dr. Lisa Robbins

2.

Identify the personnel who held every position listed on Page 2 of your September 13, 2006 Application For a License to Operate a Drug Abuse Treatment and Education Program, a copy of which is attached hereto as Exhibit B.

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, NN GA states that it did not keep records of personnel in the form set out in Exhibit B. NN GA

cannot remember all the personnel, but, pursuant to the terms and conditions of the protective orders entered in this case, to the best of its knowledge, information and belief, the personnel were as follows:

Counselor /Therapist/Social Worker (certified or licensed): Robin Muse, Joan Daniel, Lori Pieracerts

Counselor (not licensed or certified): Gene Adams, Abby Bailey, Brenda Evans, Tracy Lane, Huburt Bullard

Consultant: Health Practice Lawyer Sandy McNabb

Administrative Personnel: Kurtis Money, Debra Toth, Tracy Reynolds, Bernadette Money, Jeni Hilton, Chris Tucker, Jeni Hilton, Maria Delgado

Program Director: Mary Rieser

Medical Director: Medical approval to do program Dr. Lisa Robbins

Other: RN Linda Hall

3.

Identify the personnel who held every position listed on Page 2 of your January 24, 2007 Application For a License to Operate a Drug Abuse Treatment and Education Program, a copy of which is attached hereto as Exhibit C.

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, NN GA states that it did not keep records of personnel in the form set out in Exhibit C. NN GA cannot remember all the personnel, but, pursuant to the terms and conditions of the protective orders entered in this case, to the best of its knowledge, information and belief, the personnel were as follows:

Counselor /Therapist/Social Worker (certified or licensed): Robin Muse, Joan Daniel, Dana Kuebler

Counselor (not licensed or certified): Gene Adams, Abby Bailey, Brenda Evans, Tracy Lane, Joe Sessions

Consultant: Health Practice Lawyer Sandy McNabb

Registered Nurse: Linda Hall

Licensed Practical Nurse: Veronica Maddox, Daniel Maddox

Administrative Personnel: Kurtis Money, Debra Toth, Tracy Reynolds, Bernadette Money, Jeni Hilton, Chris Tucker, Jeni Hilton, Maria Delgado, Randy Gatlin

Program Director: Mary Rieser

Medical Director: Dr. Lisa Robbins

4.

Identify the personnel who held every position listed on Page 2 of your updated Application For a License to Operate a Drug Abuse Treatment and Education Program, a copy of which is attached hereto as Exhibit D.

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, NN GA states that it did not keep records of personnel in the form set out in Exhibit D. NN GA cannot remember all the personnel, but, pursuant to the terms and conditions of the protective orders entered in this case, to the best of its knowledge, information and belief, the personnel were as follows:

Counselor /Therapist/Social Worker (certified or licensed): Robin Muse, Joan Daniel, Dana Kuebler

Counselor (not licensed or certified): Gene Adams, Abby Bailey, Brenda Evans, Tracy Lane, Joe Sessions

Consultant: Health Practice Lawyer Sandy McNabb

Registered Nurse: Linda Hall

Licensed Practical Nurse: Veronica Maddox, Daniel Maddox

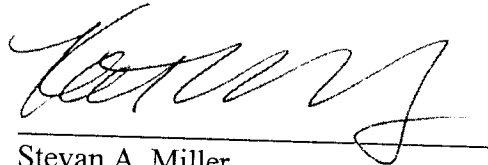
Administrative Personnel: Kurtis Money, Debra Toth, Tracy Reynolds, Bernadette Money, Jeni Hilton, Chris Tucker, Jeni Hilton, Maria Delgado, Randy Gatlin

Program Director: Mary Rieser

Medical Director: Dr. Lisa Robbins

This the 23rd day of November, 2011.

DREW ECKL & FARNHAM, LLP



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CLERK OF SUPERIOR COURT
GENERAL COUNTY, GA.
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