

IN THE SUPERIOR COURT OF RICHMOND COUNTY STATE OF GEORGIA

ANNIE LAURA OLIVER GRAY,
Individually and as Executrix of the Estate
of Robert Earl Gray, Deceased,

Plaintiff,

v.

GEMINI MOTOR TRANSPORT, L.P.;
HENRY C. FORTENBERRY; and
NATIONAL UNION FIRE INSURANCE
COMPANY OF PITTSBURGH, PA,

Defendants.

Civil Action File No. 2012RCCV240

**PLAINTIFF ANNIE LAURA OLIVER GRAY'S SECOND REQUEST FOR
PRODUCTION OF DOCUMENTS TO DEFENDANT GEMINI MOTOR
TRANSPORT, L.P.**

COMES NOW Plaintiff Annie Laura Oliver Gray, and submits the following
Second Request for Production of Documents to Defendant Gemini Motor Transport,
L.P., pursuant to the Georgia Civil Practice Act.

DEFINITIONS

As used herein, the terms listed below are defined as follows:

1. The term "**Document**" as used herein shall be given a very broad definition to include every type of paper, writing, data, record, graphic, drawing, photograph, audio recording and video recording. The term includes material in all forms, including printed, written, recorded, or other. The term includes all files, records and data contained in any computer system, computer component and/or computer storage (e.g., hard drive, disc, magnetic tape, backup system, etc.). This term includes, but is not limited to, correspondence, reports, meeting

minutes, memoranda, stenographic or handwritten notes, diaries, notebooks, account books, orders, invoices, statements, bills, checks, vouchers, purchase orders, studies, surveys, charts, maps, analyses, publications, books, pamphlets, periodicals, catalogues, brochures, schedules, circulars, bulletins, notices, instructions, manuals, journals, e-mails, e-mail attachments, data sheets, work sheets, statistical compilations, data processing cards, microfilms, computer records (including printouts, disks or other magnetic storage media), tapes, photographs (positive or negative prints), drawings, films, videotapes, hard drive recordings, pictures, and voice recordings. Plaintiff expressly intends for the term "Document" to include every copy of such writing, etc. when such copy contains any commentary or notation whatsoever that does not appear on the original and any attachments or exhibits to the requested document or any other documents referred to in the requested document or incorporated by reference.

2. "**Person**" means any natural person, corporation, partnership, proprietorship, association, organization, group of persons, or any governmental body or subdivision thereof.

3. (a) "**Identify**" with respect to any "**person**" or any reference to stating the "**identity**" of any "**person**" means to provide the name, home address, telephone number, business name, business address, and business telephone number of such person, and a description of each such person's connection with the events in question.

(b) "**Identify**" with respect to any "**document**" or any reference to stating the "**identification**" of any "**document**" means to provide the title and date of each such document, the name and address of the party or parties responsible for the

preparation of each such document, the name and address of the party who requested or required the preparation of the document or on whose behalf it was prepared, the name and address of the recipient or recipients of each such document, and the names and addresses of any and all persons who have custody or control of each such document, or copies thereof.

4. "**Subject Incident**" means events made the basis of the Complaint, including, but not limited to, the incident at issue which occurred on November 23, 2011, in Jenkins County, Georgia.

5. "**You**," "**Your**," or "**Gemini Motor**" means Defendant Gemini Motor Transport, L.P.

6. "**Defendant Fortenberry**" means Defendant Henry C. Fortenberry.

7. "**National Union Insurance**" means Defendant National Union Fire Insurance Company of Pittsburgh, PA.

8. "**Plaintiff**" means Plaintiff Annie Laura Oliver Gray.

9. "**General Gray**" or "**Decedent**" means Decedent Lieutenant General Robert Earl Gray.

10. "**The Estate**" for purposes of these Interrogatories means the Estate of Robert Earl Gray.

11. "**Similar**" shall have the meaning given in the American Heritage Dictionary, which is "showing some resemblance; related in appearance or nature; alike but not identical." As used here, the word "similar" shall not be limited as if modified by the word "substantially" and shall not mean "the same". If you limit the information provided because you use another interpretation of the word "similar," please state the interpretation you are using and reveal the

nature of the information withheld.

12. The terms “**and**” as well “**or**” shall be each construed conjunctively and disjunctively as necessary to bring within the scope of each interrogatory and request for documents all information and documents that might otherwise be construed to be outside its scope. The term “**and/or**” shall be construed likewise.

13. Whenever necessary to bring within the scope of an interrogatory or request for production of documents any information or document that might otherwise be construed to be outside its scope: (i) the use of a verb in any tense shall be construed as the use of the verb in all other tenses; (ii) the use of the singular shall be construed as the use of the plural and vice versa; and (iii) “**any**” includes “all,” and “**all**” includes “any.”

14. With regard to any term used herein that is deemed by the responding party as being ambiguous or vague, a term shall be construed in its broadest sense to encompass all reasonable definitions of that term.

DOCUMENT REQUESTS

GENERAL

REQUEST NO. 1: A copy of all documents in **Gemini Motor Transport’s** possession concerning its contractual relationship with Cadec, Inc. and any of its affiliated, parent or subsidiary companies. The requested documents include but are not limited to all contracts, correspondence, training materials, reports, downloads, purchase agreements, service contracts, data storage, data analysis, e-mails, phone logs, product demonstrations, complaints, returns, customer support materials, product

manuals, sales literature and videos for all products and services purchased and used by **Gemini Motor Transport**.

REQUEST NO. 2: A copy of each "for safety" bulletins issued to its drivers for the entire time that Fortenberry was/is employed with **Gemini Motor Transport**.

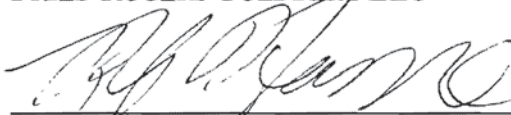
REQUEST NO. 3: A copy of all Cadec entries for Defendant Fortenberry for 90 days before and up to the subject collision.

REQUEST NO. 4: A copy of each of the incident reports and "complaint calls" referenced in the letter dated June 9, 2010 **Bates stamped number 100050** (Copy attached hereto).

REQUEST NO. 5: A copy of each of the speeding events identified in letter dated October 28, 2008 **Bates stamp number 100069** (Copy attached hereto).

Dated on September 21st, 2012.

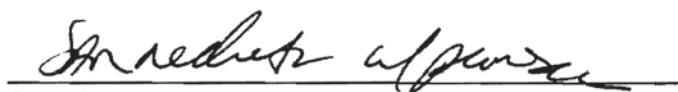
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