

thigh, or buttocks; or (b) direct contact between any part of a third party's body and Your genitalia, anus, groin, breast, inner thigh.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms "direct contact" and "sexual manner." Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

t. ***You and/or Your.*** The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Please admit that the photograph Bates Stamped AHA_00000002 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits

the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

2. Please admit that the photograph Bates Stamped AHA_00000002_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

3. Please admit that the photograph Bates Stamped AHA_00000003 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

4. Please admit that the photograph Bates Stamped AHA_00000004 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff,

after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

5. Please admit that the photograph Bates Stamped AHA_00000004_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

6. Please admit that the photograph Bates Stamped AHA_00000005 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff

objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

7. Please admit that the photograph Bates Stamped AHA_00000005_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

8. Please admit that the photograph Bates Stamped AHA_00000006 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

9. Please admit that the photograph Bates Stamped AHA_00000007 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure,

including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

10. Please admit that the photograph Bates Stamped AHA_00000008 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

11. Please admit that the photograph Bates Stamped AHA_00000009 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

12. Please admit that the photograph Bates Stamped AHA_00000027 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure,

including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of hair and a finger. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

13. Please admit that the photograph Bates Stamped ALH_00000028 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

14. Please admit that the photograph Bates Stamped ALH_00000028_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

15. Please admit that the photograph Bates Stamped ALH_00000505 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

16. Please admit that the photograph Bates Stamped ALH_00000505_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

17. Please admit that the photograph Bates Stamped ALH_00000509 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

18. Please admit that the photograph Bates Stamped ALH_00000509_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

19. Please admit that the photograph Bates Stamped ALH_00000511 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

20. Please admit that the photograph Bates Stamped ALH_00000511_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

21. Please admit that the photograph Bates Stamped ALH_00000515 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

22. Please admit that the photograph Bates Stamped ALH_00000515_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

23. Please admit that the photograph Bates Stamped ALH_00000517 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

24. Please admit that the photograph Bates Stamped ALH_00001586 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

25. Please admit that the photograph Bates Stamped ALH_00001586_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

26. Please admit that the photograph Bates Stamped ALH_00000010 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

27. Please admit that the photograph Bates Stamped ALH_00000010_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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28. Please admit that the photograph Bates Stamped ALH_00000011 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" because there is no image.

29. Please admit that the photograph Bates Stamped ALH_00000012 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

30. Please admit that the photograph Bates Stamped ALH_00000013 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

31. Please admit that the photograph Bates Stamped ALH_00000013_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

32. Please admit that the photograph Bates Stamped ALH_00000014 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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33. Please admit that the photograph Bates Stamped ALH_00000014_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

34. Please admit that the photograph Bates Stamped ALH_00000015 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

35. Please admit that the photograph Bates Stamped ALH_00000015_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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36. Please admit that the photograph Bates Stamped ALH_00000016 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

37. Please admit that the photograph Bates Stamped ALH_00000016_B is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the top of a head. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

38. Please admit that the photograph Bates Stamped ALH_00000038 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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39. Please admit that the photograph Bates Stamped ALH_00000056 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

40. Please admit that the photograph Bates Stamped ALH_00000057 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

41. Please admit that the photograph Bates Stamped ALH_00000058 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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42. Please admit that the photograph Bates Stamped ALH_00000059 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

43. Please admit that the photograph Bates Stamped ALH_00000060 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

44. Please admit that the photograph Bates Stamped ALH_00000061 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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45. Please admit that the photograph Bates Stamped ALH_00000062 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

46. Please admit that the photograph Bates Stamped ALH_00000063 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

47. Please admit that the photograph Bates Stamped ALH_00000064 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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48. Please admit that the photograph Bates Stamped ALH_00000065 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

49. Please admit that the photograph Bates Stamped ALH_00000066 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

50. Please admit that the photograph Bates Stamped ALH_00000067 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

51. Please admit that the photograph Bates Stamped ALH_00000068 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

52. Please admit that the photograph Bates Stamped ALH_00000069 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

61. Please admit that the photograph Bates Stamped ALH_00000041 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

62. Please admit that the photograph Bates Stamped ALH_00000042 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

63. Please admit that the photograph Bates Stamped ALH_00000043 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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64. Please admit that the photograph Bates Stamped ALH_00000045 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

65. Please admit that the photograph Bates Stamped ALH_00000054 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

66. Please admit that the photograph Bates Stamped ALH_00000055 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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67. Please admit that the photograph Bates Stamped ALH_00000073 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

68. Please admit that the photograph Bates Stamped ALH_00000074 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

69. Please admit that the photograph Bates Stamped ALH_00000075 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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70. Please admit that the photograph Bates Stamped ALH_00000076 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

71. Please admit that the photograph Bates Stamped ALH_00000077 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

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72. Please admit that the photograph Bates Stamped ALH_00000535 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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73. Please admit that the photograph Bates Stamped ALH_00000046 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

74. Please admit that the photograph Bates Stamped ALH_00000047 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

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75. Please admit that the photograph Bates Stamped ALH_00000048 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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76. Please admit that the photograph Bates Stamped ALH_00000049 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

77. Please admit that the photograph Bates Stamped ALH_00000078 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

78. Please admit that the photograph Bates Stamped ALH_00000079 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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79. Please admit that the photograph Bates Stamped ALH_00000080 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

80. Please admit that the photograph Bates Stamped ALH_00000081 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

81. Please admit that the photograph Bates Stamped ALH_00000082 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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82. Please admit that the photograph Bates Stamped ALH_00000083 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

83. Please admit that the photograph Bates Stamped ALH_00000084 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it

seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

84. Please admit that the photograph Bates Stamped ALH_00000031 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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85. Please admit that the photograph Bates Stamped ALH_00000033 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of legs. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

86. Please admit that the photograph Bates Stamped ALH_00007023 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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99. Please admit that the photograph Bates Stamped ALH_00007036 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

100. Please admit that the photograph Bates Stamped ALH_00007037 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

101. Please admit that the photograph Bates Stamped ALH_00007038 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

102. Please admit that the photograph Bates Stamped ALH_00007039 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

103. Please admit that the photograph Bates Stamped ALH_00007040 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

104. Please admit that the photograph Bates Stamped ALH_00007041 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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105. Please admit that the photograph Bates Stamped ALH_00007042 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

106. Please admit that the photograph Bates Stamped ALH_00007043 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

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111. Please admit that the photograph Bates Stamped ALH_00007048 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

112. Please admit that the photograph Bates Stamped ALH_00007049 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

113. Please admit that the photograph Bates Stamped ALH_00007050 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

114. Please admit that the photograph Bates Stamped ALH_00007051 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

115. Please admit that the photograph Bates Stamped ALH_00007052 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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116. Please admit that the photograph Bates Stamped ALH_00007053 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

117. Please admit that the photograph Bates Stamped ALH_00007054 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

118. Please admit that the photograph Bates Stamped ALH_00007055 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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119. Please admit that the photograph Bates Stamped ALH_00007056 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

120. Please admit that the photograph Bates Stamped ALH_00007057 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

121. Please admit that the photograph Bates Stamped ALH_00007058 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

122. Please admit that the photograph Bates Stamped ALH_00007060 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

123. Please admit that the photograph Bates Stamped ALH_00007061 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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124. Please admit that the photograph Bates Stamped ALH_00007062 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

125. Please admit that the photograph Bates Stamped ALH_00007063 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

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126. Please admit that the photograph Bates Stamped ALH_00007064 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

127. Please admit that the photograph Bates Stamped ALH_00007065 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

128. Please admit that the photograph Bates Stamped ALH_00007066 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff,

after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

129. Please admit that the photograph Bates Stamped ALH_00007067 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

130. Please admit that the photograph Bates Stamped ALH_00007068 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

131. Please admit that the photograph Bates Stamped ALH_00007069 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

132. Please admit that the photograph Bates Stamped ALH_00007070 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

133. Please admit that the photograph Bates Stamped ALH_00007071 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

134. Please admit that the photograph Bates Stamped ALH_00007072 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

135. Please admit that the photograph Bates Stamped ALH_00007073 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

136. Please admit that the photograph Bates Stamped ALH_00007074 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff responds: admit.

137. Please admit that the photograph Bates Stamped ALH_00007075 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff

objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

138. Please admit that the photograph Bates Stamped ALH_00007076 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

139. Please admit that the photograph Bates Stamped ALH_00007077 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

140. Please admit that the photograph Bates Stamped ALH_00007078 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure,

including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

141. Please admit that the photograph Bates Stamped ALH_00007079 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

142. Please admit that the photograph Bates Stamped ALH_00007080 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

143. Please admit that the photograph Bates Stamped ALH_00007081 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure,

including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

144. Please admit that the photograph Bates Stamped ALH_00007082 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and

accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

145. Please admit that the photograph Bates Stamped ALH_00007083 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

146. Please admit that the photograph Bates Stamped ALH_00007084 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure,

including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image and the image purports to depict metadata of the photograph.

147. Please admit that the photograph Bates Stamped ALH_00007085 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

148. Please admit that the photograph Bates Stamped ALH_00007086 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

149. Please admit that the photograph Bates Stamped ALH_00007087 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

150. Please admit that the photograph Bates Stamped ALH_00007088 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

151. Please admit that the photograph Bates Stamped ALH_00007089 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

152. Please admit that the photograph Bates Stamped ALH_00007090 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

153. Please admit that the photograph Bates Stamped ALH_00007091 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

154. Please admit that the photograph Bates Stamped ALH_00007092 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any

other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

155. Please admit that the photograph Bates Stamped ALH_00007093 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

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156. Please admit that the photograph Bates Stamped ALH_00007094 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

157. Please admit that the photograph Bates Stamped ALH_00007095 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound.

Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

158. Please admit that the photograph Bates Stamped ALH_00007097 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

159. Please admit that the photograph Bates Stamped ALH_00007098 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the

extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

160. Please admit that the photograph Bates Stamped ALH_00007099 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate

depiction of the image displayed in the photograph" to the extent the image purports to depict metadata of the photograph.

161. Please admit that the photograph Bates Stamped ALH_00007101 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff objects to this request to the extent it seeks expert evidence. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits the photograph referred to in the request appears to be a photograph of the Defendant. Plaintiff, after a reasonable inquiry, is unable to admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" to the extent there is a depiction of an injury or injuries in the image.

162. Please admit that the photograph Bates Stamped ALH_00007096 is a true, genuine, and accurate depiction of the image displayed in the photograph.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to

admit or deny the photograph is a "true, genuine and accurate depiction of the image displayed in the photograph" because there is no image.

163. Please admit that the transcript Bates Stamped ALH_00007103_001 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007102.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

164. Please admit that the transcript Bates Stamped ALH_00007104_001 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007102.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

165. Please admit that the transcript Bates Stamped ALH_00007106_001 - ALH_00007106_031 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007105.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to

admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

166. Please admit that the transcript Bates Stamped ALH_00007110_001 - ALH_00007110_004 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007109.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

167. Please admit that the transcript Bates Stamped ALH_00007112_001 - ALH_00007112_010 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped ALH_00007111.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the transcript is an "accurate, genuine and authentic transcription of the audio recording" to the extent the transcript purports to depict metadata of the audio recording.

168. Please admit that the transcript Bates Stamped ALH_00007113 - ALH_00007120 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018321.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject

to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

169. Please admit that the transcript Bates Stamped ALH_00007121 - ALH_00007311 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018326.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

170. Please admit that the transcript Bates Stamped ALH_00007312 - ALH_0007480 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018322.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

171. Please admit that the transcript Bates Stamped ALH_00007481 - ALH_00007542 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018323.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

172. Please admit that the transcript Bates Stamped ALH_00007543 - ALH_00007622 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018324.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

173. Please admit that the transcript Bates Stamped ALH_00007623 - ALH_00007655 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018325.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

174. Please admit that the transcript Bates Stamped ALH_00007656 - ALH_00007674 is an accurate, genuine, and authentic transcription of the audio recording Bates Stamped DEPP00018319.

ANSWER:

Plaintiff objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff, after a reasonable inquiry, is unable to admit or deny the request because the documents referenced have not been produced.

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Dated: November 10, 2020

Respectfully submitted,



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Counsel for Plaintiff John C. Depp, II

CERTIFICATE OF SERVICE

I hereby certify that on this 10th day of November 2020, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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Ben G. Chew (AC)

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