

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION

STEPHANIE N. BROWN

PLAINTIFF

v.

NO. 4:14-CV-0253-KGB

STATE OF ARKANSAS; ARKANSAS
DEPARTMENT OF HEALTH; ZENOBIA
HARRIS, Individually and in her Official
Capacity; and VICKIE JONES, Individually and
in her Official Capacity

DEFENDANTS

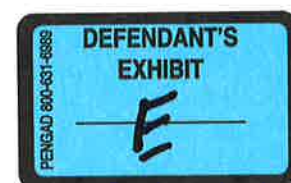
**DEFENDANT'S FIRST SET OF INTERROGATORIES AND REQUEST FOR
PRODUCTION OF DOCUMENTS PROPOUNDED TO PLAINTIFF**

Comes now Defendant by and through their attorneys, Attorney General Leslie Rutledge and Assistant Attorney General Kat Hodge, pursuant to Arkansas Rules of Civil Procedure 33 and 34, hereby propound the following Interrogatories and Requests for Production of Documents to Plaintiff, Stephanie Brown:

INTERROGATORY NO. 1: Identify any persons who have been consulted or who have assisted in the answers provided herein, or contributed any information to any answer herein, or document produced.

INTERROGATORY NO. 2: Please identify all persons who have any information relating to any of the matters alleged in your Complaint filed in this matter. For each such person, please provide the person's name, address, daytime telephone number, and occupation.

REQUEST FOR PRODUCTION NO. 1: For each person listed in the answer to Interrogatory No. 1 and 2, please provide copies of any and all statements, reports or other



communication in your possession if they relate in any manner to any of the allegations contained in your Complaint or Plaintiff's employment with the Arkansas Department of Health.

INTERROGATORY NO. 3: Please state separately the name, address and telephone number of each and every person whom you plan to call to testify on your behalf at the trial of this matter, specifically designating whether he/she is an expert or a lay witness, and state the general nature of each such person's testimony.

INTERROGATORY NO. 4: Do you intend to call any expert witnesses at the trial of this matter? If so, for each expert witness, provide such person's name, address, daytime telephone number, and a list of their qualifications.

REQUEST FOR PRODUCTION NO. 2: For each expert you plan to call as a witness, please provide, or make available to defendants' counsel for inspection and copying: the current curriculum vitae of the expert; and any written report prepared by the expert witness containing his/her opinion and conclusions relating to the matters about which he/she may testify at trial; as well as any underlying data, resource materials, written documents, computer programs or disks, or other materials, produced by or utilized by each expert in reaching his/her conclusion, preparing his/her written report or preparing for his/her testimony at trial.

INTERROGATORY NO. 5: Please state in detail each and every act of any employee or representative of the Arkansas Department of Health which you claim constitutes any form of **Race Discrimination** against you and about which you will testify at trial. For each such act or occurrence list the date of such act or occurrence; how it occurred; and the names of any persons present when you alleged such act or occurrence happened.

REQUEST FOR PRODUCTION NO. 3: If your Answer to Interrogatory No. "5" is supported by a recording, word processor or computer entry, note, page from any diary, page

from any calendar, memorandum, correspondence, statement, report, any communication, email, report, document, record, or any other item then please produce and attach copies of the same.

INTERROGATORY NO. 6: Please state in detail each and every act of any employee or representative of the Arkansas Department of Health which you claim constitutes any form of **Retaliation** against you and about which you will testify at trial. For each such act or occurrence list the date of such act or occurrence; how it occurred; the names of any persons present when you alleged such act or occurrence happened; and how you were discriminated against.

REQUEST FOR PRODUCTION NO. 4: If your Answer to Interrogatory No. “6” is supported by a recording, word processor or computer entry, note, page from any diary, page from any calendar, memorandum, correspondence, statement, report, any communication, email, report, document, record, or any other item then please produce and attach copies of the same.

INTERROGATORY NO. 7: Other than the persons identified in your answer to Interrogatories No. 5 and 6, please state the name, address and telephone number of any and all persons known to you who have knowledge of facts relevant to the subject matter of this lawsuit and/or allegations stated in your Complaint.

INTERROGATORY NO. 8: Have you or anyone else acting on your behalf obtained statements in any form, whether written, oral, stenographically transcribed or otherwise, from any person or persons who have information or knowledge pertaining to any of the allegations which you have raised in your Complaint? If so, please state separately:

- (a) The name, address and telephone number of each person from whom a statement was obtained;
- (b) The type of statement which was taken (whether written, recorded, transcribed, etc.);
- (c) The name, address, employer and telephone number of the person who took the statement;

- (d) The name, address and telephone number of the present custodian of each statement so taken; and,
- (e) The date on which each statement was taken.

REQUEST FOR PRODUCTION NO. 5: If your Answer to Interrogatory No. 8 is “yes,” please provide a copy of each and every recording, word processor or computer entry, note, page from any diary, page from any calendar, memorandum, correspondence or other document which contains any information pertaining to your employment at the Arkansas Department of Health or any of the allegations you have raised in your Complaint.

INTERROGATORY NO. 9: Please state whether, except for this action, you have ever been a party to any civil litigation. As to each such civil lawsuit, please state:

- (a) The name of all parties;
- (b) The court in which the suit was (is) pending;
- (c) The case number;
- (d) The final resolution of the lawsuit; and,
- (e) The amount realized by settlement or judgment.

INTERROGATORY NO. 10: Please list all of the positions you have held since employed by the Arkansas Department of Health and for each, provide the dates of your employment, rate of compensation, and a general description of your duties. Also, provide the name, address and daytime telephone number of your supervisor, and also, the personnel director of each.

REQUEST FOR PRODUCTION NO. 6: Please execute and return the attached Employment Records authorization.

REQUEST FOR PRODUCTION NO. 7: Please execute and return the attached Authorization and Release for Educational Records.

REQUEST FOR PRODUCTION NO. 8: Please produce all documents evidencing the Plaintiff's income or sources of income for the years 2011 to present, including, but not limited to, federal and state income tax returns, pay stubs, 1099 forms, and W-4 forms.

REQUEST FOR PRODUCTION NO. 9: Please execute and return the attached Authorization and Release for State and Federal Tax records.

INTERROGATORY NO. 11: Provide in detail, any and all amounts you are claiming in this matter for actual or compensatory damages. For each such damage claim, state the amount of the claim, the period(s) covered, and how such damages are calculated.

INTERROGATORY NO. 12: Provide in detail the facts upon which you base your claim for emotional and physical distress, humiliation, and harm-to-reputation damages in this lawsuit, including

- (a) The name of each person who you believe has knowledge of any facts which support your claim of entitlement to an award of emotional and physical distress, humiliation, and harm-to-reputation damages;
- (b) For each person who has information or knowledge regarding your claim for emotional and physical distress, humiliation, and harm-to-reputation damages, set forth in detail each and every fact which you contend or believe person knows, or might know, which in any way tends to prove or disprove your claim for damages; and
- (c) Provide in detail the amount you are seeking for emotional distress, humiliation, and harm-to-reputation damages.

INTERROGATORY NO. 13: Identify any and all health care providers, included but not limited to doctors, physicians, counselors, ministers, etc. that you have consulted relating to the emotional distress allegedly suffered as a result of the Defendant's conduct, and describe in complete detail each visit you made to each provider, including the date and length of each visit,

the reason for the visit, medication prescribed, if any, the amount charged for the visit, whether such amount was paid for by insurance, and whether any health care provided has advised you that you may require future or additional treatment for alleged emotional distress or physical injury.

REQUEST FOR PRODUCTION NO. 10: Please provide a copy of any bills, receipts or statements, medical or otherwise, for which you claim any defendant is responsible.

REQUEST FOR PRODUCTION NO. 11: Please produce copies of any and all reports, treatment plans, summaries, letters, notes, or other documents generated or prepared by any physician, psychologist, counselors or other practitioner of the medical or healing arts concerning their examination, treatment or conferences with you regarding any emotional, mental and/or physical condition which you may claim to have experienced or suffered as a direct and proximate result of Defendants' actions regarding your employment, or other matters alleged in your Complaint.

REQUEST FOR PRODUCTION NO. 12: Please provide an executed original of the attached Medical Authorization.

REQUEST FOR PRODUCTION NO. 13: Please produce copies of any documentary evidence, whether exhibits, affidavits or otherwise, you intend to introduce at trial or refer to during the course of the trial of this matter. With respect to each item, identify the person who has custody of the item and the present location of the item.

INTERROGATORY NO. 16: Describe in detail your role in the grievance hearing held concerning Lydia Martin, including your knowledge of the grievance, what information you provided concerning the grievance and/or grievance hearing, any and all statements you

provided concerning the grievance, and any and all information you are personally aware of concerning Ms. Martin's EEOC charge.

REQUEST FOR PRODUCTION NO. 14: If your Answer to Interrogatory No. "16" is supported by a recording, word processor or computer entry, note, page from any diary, page from any calendar, memorandum, correspondence, statement, report, any communication, email, report, document, record, or any other item then please produce and attach copies of the same.

REQUEST FOR PRODUCTION NO. 15: Please provide a copy of all documents not specifically requested above, but which were used to answer these interrogatories or that will support your claim for damages in this action.

INTERROGATORY NO. 18: Describe in detail the actions you maintain support your request for punitive damages.

Respectfully submitted,

LESLIE RUTLEDGE
Attorney General

By: /s/ Ka Tina ("Kat") R. Hodge
Ka Tina R. Hodge
Ark Bar No. 2003100
Assistant Attorney General
Arkansas Attorney General's Office
323 Center Street, Suite 200
Little Rock, AR 72201
PH: (501) 682-1307
Fax: (501) 682-2591
Email: KaTina.Hodge@arkansasag.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I, Ka Tina (“Kat”) R. Hodge, hereby certify that on August 31, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which shall send notification of such filing to all counsel of record.

I, Ka Tina (“Kat”) R. Hodge, hereby certify that on August 31, 2015, I mailed a true and correct copy of the foregoing via United States Postal Service to:

Stephanie Brown, *pro se*
7408 Vega Drive
Little Rock, Arkansas 72209

/s/ KaTina R. Hodge
Ka Tina R. Hodge