

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

ROBERT S. JOHNSON,)	
)	
Plaintiff,)	
)	
vs.)	No. 07 C 3996
)	
G.D.F., INC., d/b/a DOMINO'S PIZZA,)	JUDGE GUZMAN
and GREGORY D. FISCHER,)	
)	
Defendants.)	

ANSWERS TO DEFENDANTS' INTERROGATORIES TO PLAINTIFF

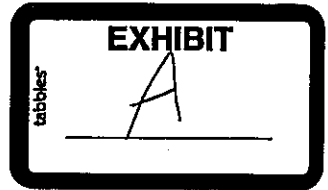
To: G.D.F., INC., et al
Through Their Attorneys,
Donald S. Rothschild
Sara L. Spitler
Brian M. Dougherty
Goldstine, Skrodzki, Russian,
Nemec and Hoff, Ltd.
835 McClintock Drive, Second Floor
Burr Ridge, IL 60527
(630) 655-6000

INTERROGATORIES

1. State the name, address and phone number of every person who participated in answering these Interrogatories.

ANSWER:

Robert Johnson
5930 West Erie, Apt 3
Chicago, IL 60644
(708)699-0993



2. Identify Plaintiff's term of employment with Defendants, including but not limited to, the first day of work, any intervening time-off (e.g., lay offs), and the last day of employment.

ANSWER:

See defendants' employee records; see also plaintiff's deposition taken in Johnson v. G.D.F., Inc., et al., No. 05CH07990 (Cook Co., Ill.)

3. Identify the last day that Plaintiff reported to work. Identify why Plaintiff did not report to work on his next scheduled work day.

ANSWER:

Plaintiff did report to work on or about July 30, 2005 his next scheduled workday, but was directed to go home by Josh Behary and Dave Peterson, because he was no longer allowed in the store. This was shortly after he had filed a back wage class action in the Circuit Court of Cook County, Illinois, No. 2005CH07990 and defendant had been served with summons.

4. Identify all crimes that Plaintiff has pled guilty to, or been convicted of, within the last ten years. Crimes include felonies and misdemeanors occurring in the United States and any other country.

ANSWER: See plaintiff's deposition taken in state case, No. 2005CH07990 (Cook Co., Ill.)

5. Did Plaintiff complete an employment application for Defendants prior to being hired? If yes, did the employment application require Plaintiff to disclose all crimes in which he had been convicted of, or pled guilty to? If yes, did Plaintiff disclose all such crimes? If no, then identify why Plaintiff failed to disclose these crimes.

ANSWER: See answer 4, above

6. Identify all periods of time in which you contend that you worked in excess of 40 hours per week for Defendants.

ANSWER: See answer 4, above

7. Identify when Defendants reduced your hours of work as alleged in paragraph 5 of the Complaint. Identify all discussions between you and Defendants regarding your reduction in hours.

ANSWER: Defendants' reduced plaintiff's hours after they received my attorney's notice of attorney's lien, in May 2005, after summons was served on them, he was fired.

8. State the factual basis for your allegation that you were "maliciously discharged from [your] position of gainful employment ..." as alleged in paragraph 5 of the Complaint, including identifying all communications with Defendants regarding your alleged discharge.

ANSWER:

Plaintiff was maliciously discharged when he arrived for work on or about July 30, 2005, and was told by Dave Peterson and Todd Behary that he was not allowed in the store. The discharge was based on his protected activity under federal law, 29 U.S.C. 215 (a) (3). Defendants had knowledge of the class action lawsuit and that plaintiff had an attorney.

9. Identify all witnesses you intend to call at trial to provide testimony pursuant to Rule 701 of the Federal Rules of Evidence.

ANSWER: Any person identified in these interrogatories.

10. Identify all witnesses you intend to call at trial to provide testimony pursuant to Rule 702 of the Federal Rules of Evidence.

ANSWER: NONE

11. Excluding yourself and Defendants, identify all persons who have knowledge of the allegations contained in your Complaint.

ANSWER:

- 1. Josh Behary**
- 2. Ghassan Braid**
- 3. Rimgaud Zemaitis**
- 4. Paul Marqusek**
- 5. Micha Tischauser**
- 6. Martin Becker**
- 7. Jeremy Weiss**
- 8. Patrick Hickey**

9. Eug Aleknavivius
10. Joshua Logan
11. Gary Huang
12. Matthew Gerdes
13. Issra Smitobol
14. Tchavdar Kovel
15. Nolan Southfield
16. Jon Tien
17. Jasenko Mahic
18. Tim Walsh
19. Ahmed Zunic
20. Jenny Smith
21. Ebonee Jones
22. Michelle Rich
23. Jessica Guerrero
24. Dave Peterson
25. Paul Kratochwill
26. Charles Schaal
27. Adam Schaal
28. Pascale Braid
29. Dave Peterson

12. Provide an itemization of all back wages you claim are owed, including the specific periods of time you contend that the back wages are owed and how the back wages were calculated.

ANSWER: Approximately \$10,000.00, plus liquidated damages of approximately \$10,000.00. See previously produced documents numbered 51-53. See, 29 U.S.C. 216 (b).

January 4, 2008

ERNEST T. ROSSIELLO

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(314) 346-8920

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the within and foregoing document was served upon the attorney for the defendant by electronic and first class mail, on or before the 4th day of January, 2008, before 5:00 P.M.

ERNEST T. ROSSIELLO