

Lee C. Durio Attorney at Law

*A Limited Liability Company

241 West Mills Avenue
Breaux Bridge, Louisiana 70517
www.duriolaw.com

Phone: (337) 909-1111
Fax: (337) 909-1112
Email: leedurio@duriolaw.com

April 22, 2022

Via Email only

Heather Duhon
Attorney at Law

***Re: St. Martin Parish Government vs Billy Broussard
16th JDC, St. Martin Parish, Louisiana, Docket No. 90830B***

Dear Glenda:

Please find the enclosed First Set of Interrogatories and Request for Production of Documents propounded onto your client, Billy Broussard.

Please answer within the legal limits pursuant to Louisiana law.

Thank you for your attention in this matter. Should you have any questions or concerns, please do not hesitate to contact this office

Sincerely,



Lee C. Durio
L.A. Bar Roll: 37453

LCD/te

ST. MARTIN PARISH GOVERNMENT

:16TH JUDICIAL DISTRICT COURT

VERSUS

: DOCKET NO. 90830 B

BILLY BROUSSARD, ET AL.

: ST. MARTIN PARISH, LOUISIANA

**FIRST SET OF INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

TO: **BILLY BROUSSARD**

Through his attorney of the record
Heather Duhon
112 Church Alley
New Iberia, LA 70560

PLEASE TAKE NOTICE that you are hereby required to answer separately, fully and in writing, under oath, by duly authorized agent or representative, the interrogatories hereinafter set forth, and to serve your answers and responses thereto on Lee C. Durio, Attorney at Law 241 W. Mills Avenue Breaux Bridge, Louisiana, attorney for **ST. MARTIN PARISH GOVERNMENT**, in his capacity of administrator of the Succession of Michael Arceneaux in accordance with Article 1421 et seq., of Louisiana Code of Civil Procedure and within fifteen days (15) days of service hereof. For each interrogatory, please state the name, title and employment designation and otherwise, identify each person answering the said interrogatory and/or providing any and all of the information contained in the answer to the said interrogatory. In accordance with Article 1421 of the Louisiana Code of Civil Procedure, these interrogatories are deemed continuing as to the discovery by the interrogated party or its counsel of information as to any additional matter concerning the subject matter of or answer to these interrogatories.

DEFINITION AND INSTRUCTIONS:

1. Any reference to “you” and all variations of that pronoun should be deemed to refer to all persons employed by, representing, or otherwise acting in concert with any of the defendants, and shall be deemed to require information concerning the knowledge of such persons as well as the knowledge of the party personally.
2. The word “identify” when used in connection with a person, firm or a corporation shall be deemed to call for the name for such identity, his, her or its present or last known address and telephone number and such other information as to fully identify such person, firm or corporation.
3. The word “identify” when used in connection with documents or other tangible evidence shall be deemed to call for a complete description of such matter, and call for the full name, address and telephone number of persons who have custody of such evidence officially, so that a subpoena duces tecum might issue to compel the production thereof.
4. The word “identify” when used in reference to any act, occurrence, occasion, meeting, transaction, or conduct (“act”), shall mean to set forth the event or events constituting such act, its location, the date and persons participating, present or involved, and the document relating or referring in any way thereto; and when used in reference to any discussion, shall mean in addition to the foregoing, to set forth the substance of the discussion.
5. “Incident in question” or “accident in question” means the incident in which the plaintiff was injured that gives rise to this law suit.
6. “Related to” or “relating to” means directly or indirectly mentioning or describing, pertaining to, being connected with, or reflecting upon the stated subject matter.
7. “Document” is used in the broadest sense consistent with the Louisiana Code of Civil Procedure and includes anything the production of which can be demanded, including without limitation any written, recorded, transcribed, punched, taped, filmed, video taped,

photographed or graphic matter of any kind or description, containing information or images recorded by any technology or method, however produced, reproduced, or maintained, including, without limitation, correspondence, memoranda, agreements, releases, telegrams, stenographic or hand-written notes, work papers, drafts, diaries, calendars, journals, date books, studies, publications, financial statements, receipts of sale, purchase or shipment invoices, photographs, telephone records, diagrams, computer printouts, computer tapes, video tapes, film, microfilm and data compilations of every kind or character, whether original or a copy. Original and non-identical copies are deemed to be separate documents.

8. The phrase "health care provider" shall be deemed to include all hospitals, clinics, out patient surgery centers, diagnostic testing centers, emergency medical care providers, ambulance services, paramedics, vocational evaluators and vocational rehabilitation specialists, physicians, surgeons, eye doctors, optometrists, dentists, psychiatrists, psychologists, counselors, chiropractors, physical therapists, and/or their assistants, technicians, technologists, etc.
9. The term medical records shall include records of all health care providers as defined in (8).
10. Where necessary to give a broader scope of any of these Interrogatories, "and" includes "or" and vice versa, the past tense includes the present and vice versa, the singular includes the plural and vice versa, "any" includes "all" and vice versa, and the masculine gender includes the feminine and vice versa.
11. Demand is made for supplementation of your answers to these interrogatories as required by the Louisiana Code of Civil Procedure.

INTERROGATORIES

INTERROGATORY NUMBER 1:

Please give the names, addresses and telephone numbers of each person, expert or regular person, whom you may call to testify on your behalf and tell me what each one is going to talk about.

INTERROGATORY NUMBER 2:

Please list all the exhibits, documents, pictures, recordings, text messages, expert reports, or anything like that, which you may use at the trial of this matter.

REQUEST FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce a copy of the curriculum vitae for any expert you have consulted and/or retained for any issue in this matter.

REQUEST FOR PRODUCTION NO. 2:

Please produce any and all exhibits which you may introduce at the trial of this matter as well as any and all documents identified in your answers to interrogatories.

Respectfully Submitted:
DURIO LAW OFFICE, LLC



Lee C. Durio (37453)
241 W. Mills Avenue
Breaux Bridge, Louisiana 70517
Phone: (337) 909-1111
Fax: (337) 909-1112
Email: leedurio@duriolaw.com
Attorney for **ST. MARTIN PARISH**
GOVERNMENT

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon all counsel of record by either electronic mail, facsimile and/or by placing same in the United States mail, properly addressed and postage prepaid, this 22nd day of April, 2022.



Lee C. Durio