

16TH JUDICIAL DISTRICT COURT FOR THE PARISH OF LAFAYETTE  
STATE OF LOUISIANA

NO. 90,830

DIVISION: B

ST. MARTIN PARISH GOVERNMENT

v.

BILLY BROUSSARD ET AL.

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**REQUEST FOR PRODUCTION OF DOCUMENTS**

The following words and terms as used in the following Requests for Production of Documents have the meanings set forth below:

1. "Plaintiff" means the St. Martin Parish Government.
2. "You" and "Your" means any individual employed by St. Martin Parish Government.
3. "Person" means any natural person, individual, corporation, partnership, limited liability company, sole proprietorship, association, institute, government subdivision, joint venture, trust, firm, or other entity, whether legal or otherwise, irrespective of whether privately or publicly owned, controlled, for profit or not-for-profit, or partially or fully government controlled.
4. As used herein, the singular of any word or phrase includes the plural and the plural includes the singular. The masculine form of a noun or pronoun includes the feminine form of the noun or pronoun, and vice versa.
5. As used herein, the terms, "and" and "or" are terms of inclusion and not exclusion, and shall be construed either disjunctively or conjunctively as necessary to bring within the scope of these requests for production of any document or information that might otherwise be construed to be outside of the scope.
6. As used herein, the term "or" shall mean "and/or" and "and" shall mean "and/or."
7. "Electronic" as used herein to describe files, documents, communication or other things is to be understood to mean all tangible and non-tangible embodiments of such a thing which exists in a form that was encoded by, and/or requires retrieval through, the use of electronic means, including, but not limited to, things stored, generated, or otherwise composed on a computer, terminal, internet appliance, personal data assistant (PDA), organizer, facsimile machine, Blackberry, electronic calendar, teletype, telex, TDD, word processor, or mobile phone. Things to be produced will be from any type of magnetic, optical, chip, or other media documents stored in volatile or non-volatile memory, electronically archived documents and/or any other from that such data may be present in. Such electronic things can be from any source, including, but not limited to the producing party's own devices, any device either on or off-site that said party may have had access to, either directly or by proxy through an intranet, extranet, the internet, a local area network or through any other point-to-point or broadcast transmission of data. Things to be produced will be in any format, including, but not limited to, any word

processor, database, spreadsheet, electronic mail, image, text file, web page, video, audio, photo, presentation, compressed file archive, Portable Document Format file (PDF), videoconferencing file, Blackberry, electronic calendar, spreadsheet, instant messaging transcript, PDA file, streaming media, and the like, including any proprietary format that may exist, as well as any encrypted versions of the things listed above.

8. "Files" means any and all methods of arranging or sorting papers, records, documents or other recordings of data, contained or stored in any manner, which are maintained or controlled by you or for your behalf for preservation or reference.
9. "Document" shall mean any writing (whether handwritten, typed, printed, electronic, or otherwise made), drawing, graph, chart, calendar, electronic calendar, spreadsheet, photograph, phone record, or other data compilations from which information can be obtained (translated, if necessary, through detection devices in a reasonably usable form), and shall include, without limiting the generality of the foregoing, originals, copies, and drafts of all correspondence, e-mails, instant messaging, telegrams, teletypes, agreements, contracts, studies, reports, memoranda, electronic recordings, minutes, journal entries, diaries, appointment books, notes and notations (whether separate or added to another document), work papers, book accounts, ledgers, transcripts, newspaper clippings, affidavits, photographs, sketches, pamphlets, brochures, financial reports or summaries, electronic mail, spreadsheet, electronic calendar, calendar, Blackberry, and all other writings of any kind, and information stored on other data storage or processing equipment, including but not limited to, floppy disks, hard drives, networks, type writings, tape recordings, microfilm or microfiche, which are or were in your possession, custody, or control or known by you to have existed, and any copy or other reproduction of any such "document" or "documents."
10. "Communications" means any transmission or exchange of information, electronic or otherwise, between two or more persons, orally or in writing, and includes, without limitation, any and all correspondence, conversation or discussion, whether face-to-face or by means of telephone, telegram, telex, telecopier, e-mail, electronic mail, instant message, or any other medium of communication.
11. "Describe" means to relate as completely as possible each and every act, omission, incident, event, condition, circumstances, or things relating directly or indirectly to the subject matter of the description, including all pertinent dates. Without limiting the foregoing, this means: a. b. c. d. Identify all documents directly or indirectly related; and Identify all communications directly or indirectly related; and Identify all persons directly or indirectly related; and Identify all locations applicable to any events, incidents, conditions, circumstances, or things directly or indirectly related.
12. To "identify" a document, or any other thing, means to state its type (e.g. letter, memorandum, periodical, etc.) or otherwise describe it, and in addition, supply the following information about it: a. b. c. The name of the person who prepared it; The name of each person who signed it or in whose name it was issued; The name of each person to whom it was addressed and distributed; d. The nature of the substance of the writing with sufficient particularity to enable it to be identified; e. f. g. Its date or if it

bears no date, its approximate date; Its physical location, the name and address of its custodians, and when it came into your possession or control, if such , if such is the case; and If any such document was, but no longer is in your possession or subject to your control, "identify" includes a description or what disposition was made of it, and the identity of the person who presently has custody of it.

13. To "identify" a verbal communication means to state: a. The name and last known address of each person who participated in the communication and the name and last known address of each person who was present at the time it was made; b. By whom each such person was employed and whom each such person represented in making the communication; c. The date when the communication took place; and d. The place where the communication took place; and e. The identification (as defined in 10 above) of each document pertaining to the verbal communication.
14. The terms "pertain to," "concern," "reflect," "refer," or "relate to" means to contain a statement about, or reference to, a discussion, a description, a notation, an identification, or in any way a mention, in whole or in part.
15. When a document that "refers or relates to" any given matter is requested, the request encompasses any document or thing, as the case may be, that discusses, embodies, contains, reflects, identifies, states, refers to or concerns that matter that is in any way pertinent or relevant to that matter.
16. The terms "you" and "your" shall mean the person or entity upon which this request is served, including, but not limited to, any and all parent companies, subsidiaries, divisions, predecessors and successor entities, and other persons or entities acting or purporting to act on your behalf, including but not limited to agents, employees, attorneys, investigators, experts, consultants, and any and all other representatives having possession, custody or control of documents called for within this demand.
17. Without limitation or the term "possession, custody, or control," a document IS deemed to be in your possession, custody, or control if you have any right to such document or any public or private entity having actual possession thereof.

## **REQUEST FOR PRODUCTION OF DOCUMENTS AND THINGS REQUESTED**

### **REQUEST FOR PRODUCTION NUMBER 1:**

Please produce the **entirety** of any “nuisance” file in the possession of Plaintiff pertaining to the property at 1675 Duchamp Road, Broussard, Louisiana 70518.

### **REQUEST FOR PRODUCTION NUMBER 2:**

Please produce any communication of any form in Plaintiff’s possession to include, but not be limited to written, recorded message, and emails, for which any reference is made to the property at 1675 Duchamp Road, Broussard, Louisiana. You may exclude any documentation or

correspondence made at official public meetings of Plaintiff already in Defendant's possession or readily available from Plaintiff's website (e.g. agendas, minutes, etc.).

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing instrument has this day been served on all parties through their counsel of record in this proceeding by:

- Hand Delivery                       Prepaid U.S. Mail                       Email  
 Facsimile                               Overnight Mail Service

Breaux Bridge, Louisiana, this 8<sup>th</sup> day of March, 2022.

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BILLY BROUSSARD, in proper person