

PLEASE TAKE NOTICE that Plaintiff, Michael Campbell, hereby requests Answers under oath from Defendant(s) to the following Interrogatories within 60 days and in the manner prescribed by New Jersey Civil Rules of Procedure.

These Interrogatories are continuing Interrogatories, and you are required to immediately supplement answers to these Interrogatories if you and/or your attorney and/or your Representatives obtain further information following the time you answer these Interrogatories up to the time of trial.

MY RIGHTS LAWYERS, LLC

By: /s/ Michelle J. Douglass
Michelle J. Douglass, Esquire
Attorney for Plaintiff

Dated: July 03, 2018

GENERAL PROVISIONS AND INSTRUCTIONS FOR DISCOVERY

- A. Whenever a request for documents is framed in the conjunctive, it also shall be taken in the disjunctive and vice versa.
- B. Whenever a request for documents is framed in the singular, it also shall be taken in the plural, and vice versa.
- C. The use of any tense of any verb shall be considered also to include within its meaning all other tenses of the verb so used.
- D. All documents produced shall be segregated and identified by the paragraphs to which they are primarily responsive. Where required by a particular paragraph of these interrogatories, documents produced shall be segregated further and identified as indicated in said paragraph. For any documents that are stored or maintained in files in the normal course of business, such documents shall be produced in such files, or in such a manner to preserve and identify the file from which such documents were taken.
- E. For each document that is responsive to these interrogatories that is sought to be withheld under a claim of privilege, the following information shall be provided:
 - (i) the place, date (or approximate date), and manner of recording or otherwise preparing the document;
 - (ii) the name and title of sender, and the name and title of recipient of the document;
 - (iii) a summary of the contents of the document;
 - (iv) the identity of each person or persons (other than stenographic or clerical assistants) participating in the preparation of the document;
 - (v) the identity of each person to whom the contents of the document heretofore have been communicated by copy, exhibition, sketch, reading or substantial summarization, the date(s) of said communication, and the employer and the title of said person at the time of said communication;
 - (vi) a statement of the basis on which privilege is claimed; and
 - (vii) the identity of the person or persons supplying your attorney with the information requested in subsections (i) and (vi) above.
- F. All documents produced in response to these interrogatories shall include originals and shall be produced in total notwithstanding the fact that portions thereof may contain information not requested, shall include interim as well as final editions of a document, and shall include all editions or copies of a document that are not identical to (whether due to handwritten notations, or revisions, or otherwise) the original or other produced copy of a document.
- G. These interrogatories shall be deemed to be continuing and any information secured subsequent to the filing of answers thereto, which would have been includible in the answers to these interrogatories had it been known or available, shall be supplied by Supplemental Answers as provided by the Rules of Court.
- H. In answering the interrogatories below, defendant shall furnish not only such information as is available to the particular individual(s) answering the interrogatories, but also such information as is known to each officer, employee, representative, or agent, including their attorneys, investigators, and experts.

- I. In the event that any information is sought to be withheld under a claim of privilege, provide the information requested in Paragraph I(E) above for all documents related to or reflecting the information for which a claim of privilege is asserted.
- J. Whenever in answer to these interrogatories reference is made to a conversation or oral statement, give the date and place thereof, the identity of the persons involved in the conversation or oral statement, the identity of any persons present and the substance of the conversation or oral statement.
- K. If the information called for by an interrogatory is in whole or in part contained in documents, the information may be supplied by attaching copies of the relevant documents to your answers to the interrogatories to the extent that the documents contain the information requested, as long as same is noted in narrative form in the answer to interrogatory.
- L. If there is insufficient space to answer an interrogatory, the remainder of the answer should be put on a supplemental sheet.
- M. Whenever an interrogatory requests an answer for which there is more than one answer, each answer to the interrogatory is to be set forth in detail. For example, if an interrogatory asks when plaintiff objected to the contents of a document, and plaintiff objected on more than one occasion, the answer to the interrogatory must include each occasion when plaintiff objected.

DEFINITIONS

As used in this discovery request, the fully CAPITALIZED terms have the following meanings:

ADDRESS means a mailing address and a street address which includes a room, suite or apartment number, city, state and zip code;

COMMUNICATION AND COMMUNICATE refers to any instance in which information is conveyed by or between one or more PERSONS by any means, both oral and written, including telephone calls, facsimiles, transmission of DOCUMENTS, oral conversations, letters, telegrams, memoranda;

COMPLAINT means the complaint filed in the above referenced case;

CONTRACT, AGREEMENT and/or CONTRACTUAL AGREEMENT refers to any business arrangement for the supply of goods and/or services;

CUSTODIAN refers to the PERSON having possession, custody or control of any WRITING or physical evidence;

DESCRIBE or DESCRIBE IN DETAIL, STATE or SET FORTH IN DETAIL means to relate as completely as possible each and every act, omission, incident, event, condition, circumstance or thing relating directly or indirectly to the subject of the description including all pertinent dates and, without limitation to the foregoing, to identify all documents, communications, persons or locations directly or indirectly related thereto;

DOCUMENT refers to any medium used for recording and retrieving information including all writings of any kind, including the original and all non-identical copies, whether different from the originals by reason of any notation made on such copies or otherwise (including without limitation correspondence, memoranda, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, interoffice and intra office communications, offers, notations of any sort of conversations, telephone calls, meetings or other communications, bulletins, printed matter, computer printouts, teletypes, telefax, invoices,

worksheets and all drafts, alterations, modifications, changes and amendments of any of the foregoing) graphic or aural records or representations of any kind (including without limitation, photographs, charts, graphs, microfiche, microfilm, videotape, recordings, motion pictures) and electronic, mechanical or electronic records or representations of any kind (including without limitation, tapes, cassettes, discs, or recordings, any written, typed, printed, recorded or graphic matter, however preserved, produced or reproduced, of any type or description, regardless of origin or location;

DURING THE RELEVANT TIME PERIOD refers to the year during which you first became acquainted with the plaintiff and/or the year during which the alleged occurrence as set forth in the complaint took place, until the present, unless otherwise specified in the request.

IDENTIFY means to describe a WRITING with such particularity as YOU would require

in a motion to produce, or to provide the name, address and telephone number of a PERSON;

LOCATE or LOCATION means to provide a detailed physical description of exactly where a PERSON, object or event can be found or occurred, including, but not limited to, an ADDRESS;

OCCURRENCE and INCIDENT refers to the event or events as set forth and alleged in the complaint and/or the subject matter of this action;

PERSON means a natural person as well as all types of business, including associations, subsidiaries, companies, partnerships, joint ventures, corporations, trusts, estates, fictitious, governmental and public entities;

PROFESSIONAL AND/OR BUSINESS ASSOCIATION refers to any relationship, alliance, affiliation, correlation or any other connection whatsoever;

POLICY means a rule, procedure or directive, formal or informal, written or unwritten, and includes each common practice, custom and understanding of course of conduct recognized and accepted as such by YOU or by PERSONS subject to it;

SUBJECT PREMISES means the premises identified in Plaintiff's complaint as the geographic location of the incident;

WRITING means any and all handwritten material, type written material, printed material, photocopies, photographs, and every other means of recording upon any tangible thing, together with any form of communication or other representation which would constitute a WRITING within the meaning of the Rules of Evidence;

YOU and YOUR means the above-named "Responding Party" and includes your agents, employees, attorneys, advisors, and any other PERSON acting on your behalf;

When referencing or referring to documents attached to answers to interrogatories or responses to Notices to Produce or Demand for Production of Documents, please date stamp each page submitted and reference those numbers being referred in each answer.

INITIAL INTERROGATORIES PROPOUNDED ON DEFENDANT

1. Set forth:
 - a. Name, address and job title of the person answering these Interrogatories.
 - b. The date and place these Interrogatories were answered.
 - c. Whether the person certifying these answers is doing so based on his or her personal knowledge; and if not based on personal knowledge, identify every source upon which the person certifying these answers referred, relied or reviewed in order to certify these answers.

ANSWER:

2. State the names and addresses of all persons having personal knowledge of any fact relating to this case and for each person set forth:
 - a. The person's employer and occupation.
 - b. The subject matter for which each person has relevant knowledge.
 - c. Whether that person was an eyewitness to the incident or events in question and/or whether that person has any knowledge whatsoever of any allegation raised in the Complaint..
 - d. Relationship, if any, between you (the person(s) answering these interrogatories) and such person identified in this request.

ANSWER:

3. State whether you have obtained Statements, in any form, from any person, regarding any of the facts related to this case.

ANSWER:

4. If you answered the above question in the affirmative:
 - a. Identify the person who gave such a statement.
 - b. Identify the statement, attaching a copy to your interrogatories
 - c. Identify the person who took such a statement
 - d. Identify any person present when such a statement was taken.

ANSWER:

5. State the name, occupation, business address and telephone number, residence address and telephone number of each witness you expect to call or rely upon in the trial of this action, together with a summary of the matters to be testified about within the knowledge of each such witness, and the source of the knowledge for each and every fact to be testified to by such witness.

ANSWER:

6. State the name, field of expertise, business address and telephone number of any expert witnesses who are expected to testify at trial.

ANSWER:

7. As to each person identified in response to Interrogatory #6:
- Set forth the subject matter on which he or she was retained, employed or consulted;
 - Set forth his or her field of expertise;
 - Set forth in detail his or her qualifications and training including professional and practical experience, educational institutions attended, and degrees obtained. As to each item listed in the answer to this interrogatory, set forth the relevant dates and the nature and identify of each institution attended and of each place which experience or training was received;
 - Set forth the exact title of any article or publication written by the person relating in any way to his or her field of expertise or the subject matter of this litigation. As to each such article or publication, identify the publisher and set forth the date and location of publication;
 - Identify any and all written reports, conclusions or comments ever prepared by the person with respect to the subject matter of this litigation and attach copies of same;
 - Set forth a detailed description of all oral reports, conclusions or comments ever prepared by the person with respect to the subject matter of this litigation.

ANSWER:

8. Please set forth the names of any and all persons who will be named as a witness at trial, setting forth their name, address, telephone number and email address, and relationship to the Defendant(s). Also set forth a detailed account of what information you intend and/or anticipate to obtain from this witness at any time before, during and/or for trial.

ANSWER:

9. Please identify any and all policies and/or procedures and/or practices pertaining to employee performance reviews and/or employee performance and/or employee conduct in the workplace that were in place during any time period mentioned in the Complaint through the present. Please describe each such policy, procedure or practice and identify the dates of which same have been in effect.

ANSWER:

10. In regards to Interrogatory #8, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:
- a. Name and address
 - b. The dates during which each was responsible for setting such policy;
 - c. The individual's job title and employment history with the defendant;
 - d. Identify persons representing Plaintiff who participated in each communication.

ANSWER:

11. Please identify any and all policies and/or procedures and/or practices pertaining to retaliation and/or harassment and/or discrimination in the workplace that were in place during any time period mentioned in the Complaint through the present. Please describe each such policy, procedure or practice and identify the dates of which same have been in effect.

ANSWER:

12. In regards to Interrogatory #11, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:
- e. Name and address
 - f. The dates during which each was responsible for setting such policy;
 - g. The individual's job title and employment history with the defendant.
 - h. Identify persons representing Plaintiff who participated in each communication;

ANSWER:

13. Please identify any and all policies and/or procedures and/or practices pertaining to workplace conditions and/or safety that were in place during any time period mentioned in the Complaint through the present. Please describe each such policy, procedure or practice and identify the dates of which same have been in effect.

ANSWER:

14. In regards to Interrogatory #13, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:
- i. Name and address
 - j. The dates during which each was responsible for setting such policy;
 - k. The individual's job title and employment history with the defendant.
 - l. Identify persons representing Plaintiff who participated in each communication;

ANSWER:

15. Please identify any and all policies and/or procedures and/or practices pertaining to any matter raised in the Complaint and/or pertaining to any allegation within the Complaints that were in place during all time periods identified in the Complaint through to the present. Please describe each such policy, procedure or practice and identify the dates of which same been in effect.

ANSWER:

16. In regards to Interrogatory #15, please identify any and all individuals responsible for drafting and/or enforcing and/or implementing and/or conducting training on any such policy, procedure or practice. Include:
- a. Name and address
 - b. The dates during which each was responsible for setting such policy;
 - c. The individual's job title and employment history with the defendant.
 - d. Identify persons representing Plaintiff who participated in each communication;

ANSWER:

17. Please identify any and all job descriptions for the title and/or position held by the Plaintiff and/or for any and all titles and/or job assignments of Plaintiff at any time during Plaintiff's employment with Defendant.

ANSWER:

18. Please identify any and all supervisors and/or persons delegated with authority to supervise and/or monitor in any manner the work performed by Plaintiff for all of Plaintiff's employment.
- Identify the name of any such supervisor;
 - Identify the supervisor assigned to Plaintiff and the time period for same;
 - Identify the length and nature of the supervisory capacity;
 - Identify whether this supervisor or these supervisors performed written evaluations of Plaintiff's work performance.

ANSWER:

19. Do you deny, in whole or in part, any of the paragraphs of Plaintiff's Complaint? If so, set forth and describe in detail all facts upon which you base your denial or which relate to your denial, identify all persons with knowledge of those facts, and identify all documents relating, regarding or referring to those facts. Please specify the paragraph number of Complaint to which you are referring.

ANSWER:

20. Please set forth, in detail, any and all reasons for any and all adverse employment actions to Plaintiff as identified in the Complaint, including but not limited to, the failure to take any remedial action regarding the egress and safety issues reported by Plaintiff, Plaintiffs reports of inadequate staffing, and failing to investigate Plaintiffs reports of illegal activity including but not limited to Insurance Fraud, injury harassment/intimidation, and concerns of unsafe production flows.

ANSWER:

21. Please identify in full, the name of each person you will, may, intend to call and/or name as a witness for trial, setting forth:
- Their name and/or any names they may be referred to;
 - Date of birth;
 - Address and/or last known address;
 - Place of employment and/or last place of employment;
 - Provide a detailed account of any and all things, subject matter and/or documents you intend to utilize and/or produce from any such witness.

ANSWER:

22. Identify all employees and former employees interviewed in the course of defendant's' investigation of the allegations contained in plaintiff's Complaint, including defendants' investigation of such allegations prior to the filing of this lawsuit. If no such investigation was conducted, please explain.

ANSWER:

23. For each person identified in Interrogatory 22, state:
- Their name, address and telephone number;
 - The date, time and place he/she was interviewed;
 - The name of each person who interviewed him/her;
 - The reason he/she was interviewed;
 - The subject about which he/she was interviewed.

ANSWER:

20. Please identify all employee complaints regarding egress and/or safety issues within any of Defendant's United States facilities from 2013 until present :
- The name and title of each employee whose conduct triggered the complaint;
 - The name and title of the employee(s) making the complaint;
 - The acts or circumstances of each complaint;
 - The date(s) of these acts or circumstances;
 - The actions taken by defendants in response to each complaint;
 - The name and title of the person responsible for investigating each complaint;
 - Management's final actions on each complaint, including a specification of all disciplinary actions taken;
 - Produce all documents reflecting your answers to subparagraphs a. through g.

ANSWER:

21. Please describe all actions taken by defendant employer to prevent retaliatory harassment from occurring in the workplace during the relevant time period.

ANSWER:

22. Please identify all employee complaints of safety hazards and/or violations of working conditions alleged to have taken place which defendants received notice of during the time Plaintiff was employed, and state:
- The name and title of each employee whose conduct triggered the complaint;
 - The name and title of the employee(s) making the complaint;
 - The acts or circumstances of each complaint;
 - The date(s) of these acts or circumstances;
 - The actions taken by defendants in response to each complaint;
 - The name and title of the person responsible for investigating each complaint;
 - Management's final actions on each complaint, including a specification of all disciplinary actions taken;
 - Produce all documents reflecting your answers to subparagraphs a. through g.

ANSWER:

23. Please describe all actions taken by defendant employer to prevent safety hazards and/or violations of safe working conditions at the Pleasantville worksite during the time in which was employed.

ANSWER:

24. Please identify all employees and/or members of supervisory and/or managerial staff at the Pleasantville branch who were counseled and/or disciplined from 2010 through to the present date in regard to violations of workplace safety policies and state:
- The nature and substance of the counseling or discipline;
 - The name and title of the employee counseled or disciplined;
 - The name and title of the other involved employee;
 - The date of the counseling or discipline;
 - All follow-up action by management;
 - Provide all documents reflecting your answers to subparagraphs a. through e.

ANSWER:

25. Please identify all employees and/or members of supervisory and/or managerial staff at the Pleasantville branch who were counseled and/or disciplined from 2010 through the present date in regard to safety hazards and/or violations of workplace policies and state:
- The nature and substance of the counseling or discipline;

- b. The name and title of the employee counseled or disciplined;
- c. The name and title of the other involved employee;
- d. The date of the counseling or discipline;
- e. All follow-up action by management;
- f. Provide all documents reflecting your answers to subparagraphs a. through e.

ANSWER:

26. Please state whether the defendant has ever received a complaint regarding safety and/or compliance with OSHA and/or CEPA claim by any employee who is and/or was employed in New Jersey within the last five years.

ANSWER:

27. If your answer to the preceding Interrogatory is in the affirmative, please state:
- a. The name and title applicant or employee who made such a complaint;
 - b. The date of each complaint;
 - c. A description of the complaint and its basis;
 - d. A description of the investigation and resolution of each complaint;
 - e. The name and title of each person responsible for resolving each complaint;
 - f. The current employment status of each person filing the complaint.

ANSWER:

28. Has any employee or applicant for employment ever filed an internal complaint against the Defendant and/or against any employee of the Defendant alleging retaliatory harassment and/or constructive discharge under the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1 et. seq. ("CEPA") within the last ten years?

ANSWER:

29. If the answer to the preceding Interrogatory is in the affirmative, with reference to each complaint please state:
- a. The name of the person who filed the complaint;
 - b. State the employment history of the person who filed a complaint, including job titles and dates;
 - c. State the date the Complaint was filed;
 - d. Describe the charges made in the Complaint;
 - e. Describe all actions taken on the basis of the Complaint;
 - f. Attach a copy or state where and when counsel may examine a copy of the Complaint.

ANSWER:

30. Has any employee or applicant for employment ever filed a formal Union Grievance alleging retaliatory harassment and constructive discharge under the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1 et. seq. ("CEPA") against the Defendant in the last ten years?

ANSWER:

31. If your answer to the preceding Interrogatory is in the affirmative, with reference to each such grievance, please state:
- a. The name and address of the person who filed the Complaint;
 - b. State the employment history with the Defendant of the person who filed the Complaint including job titles and dates;
 - c. State the date the complaint was filed;
 - d. State the name and address of the Union;
 - e. Describe the bargaining units involved;
 - f. Describe the charges made in the grievance;
 - g. Describe all actions taken on the basis of the grievance;
 - h. Attach a copy or state when and where counsel may examine a copy of the grievance.

ANSWER:

32. Has any employee or applicant for employment ever filed a complaint against the Defendant with any Federal, State or Local Government Agency alleging retaliatory harassment and constructive discharge under the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1 et. seq. ("CEPA") within the last ten years?

ANSWER:

33. If your answer to the preceding interrogatory is in the affirmative, please state:
- a. The name and address of the person who filed the complaint;
 - b. State the employment history with the Defendant of the person who filed the Complaint including job titles and dates;
 - c. State the date the complaint was filed;
 - d. State the name and address of the Union;
 - e. Describe the bargaining units involved;
 - f. Describe the charges made in the grievance;
 - g. Describe all actions taken on the bases of the grievance.

ANSWER:

34. Has any employee or applicant for employment ever filed a lawsuit in State or Federal Court against the defendant alleging retaliatory harassment and constructive discharge under the New Jersey Conscientious Employee Protection Act, N.J.S.A. 34:19-1 et. seq. ("CEPA") within the last ten years?

ANSWER:

35. If the answer to the preceding Interrogatory is in the affirmative, with reference to each complaint of discrimination please:
- a. State the name of the person who filed the complaint;
 - b. State the employment history with the Defendant with the person who filed a complaint, including job titles and dates;
 - c. State the date the Complaint was filed, the Court in which the Complaint was filed, and the docket number of the lawsuit;
 - d. Describe the charges made in the Complaint;
 - e. Please state whether the final disposition of such lawsuit, and the amount of any settlement or verdict, if any;
 - f. If any such lawsuit is still pending, please state the name and address of the Plaintiff's counsel;
 - g. Attach a copy or state where and when counsel may examine a copy of the Complaint.

ANSWER:

36. Set forth in detail, for the last five years, any and all knowledge by Defendant UPS, including knowledge by the individually named defendants, its supervisors, agents, representatives and/or employees, of any actual and/or suspected OSHA violations and/or actual and/or suspected workplace safety concerns with regard to egress by employees from a building
- a. State the name of the person who you obtained this information from;
 - b. State the date and time the complaints were brought to UPS' attention;
 - c. Describe the complaints raised;
 - d. Please state whether a formal investigation by UPS occurred;
 - e. If any such investigation did occur, attach a copy of any and all investigation reports and/or notes and/or findings or state where and when counsel may examine a copy of these documents.

ANSWER:

37. Set forth in detail all of the workplace safety concerns raised by the Plaintiff during his employment with UPS.

- f. State the name of the person who you obtained this information from;
- g. State the date and time the complaints were brought to UPS' attention;
- h. Describe the complaints raised;
- i. Please state whether a formal investigation by UPS occurred;
- j. If any such investigation did occur, attach a copy of any and all investigation reports and/or notes and/or findings or state where and when counsel may examine a copy of these documents.

ANSWER:

38. Set forth in detail any and all complaints made by Plaintiff that dealt with in any manner the subject of the reporting of workplace injury (ies) which were raised by the Plaintiff during his employment with UPS.

- a. State the name of the person who you obtained this information from;
- b. State the date and time the complaints were brought to UPS' attention;
- c. Describe the complaints raised;
- d. Please state whether a formal investigation by UPS occurred;
- e. If any such investigation did occur, attach a copy of any and all investigation reports and/or notes and/or findings or state where and when counsel may examine a copy of the these documents.

ANSWER:

39. Set forth in detail the events, dates, name of employees, position of the employees, of any and all injuries occurred at the Defendant's facility located at Pleasantville from 2010 to the present. Please produce the documents in response to this interrogatory.

ANSWER:

39. Please state if there was any employee who did a workers compensation claim and states dates, event, name, position, and kind of injury, occurred at the Defendant's facility located at Pleasantville from 2010 to the present. Please produce the documents in response to this interrogatory.

ANSWER:

40. Please state the name and title of each and every employee that the Defendant claims is part of its litigation control group, as defined by R.P.C. 1.13 for purposes of this litigation.

ANSWER:

41. Please identify whether any witness and/or party and/or any party representative, including any expert witness, who will and/or may testify in this case has ever been convicted of a crime and/or whether you will be using anything, any document, and/or any tangible and/or intangible evidence in accord with New Jersey Rule of Evidence 609, Convictions of Crimes and/or any other Rule of Evidence, for purposes of impeachment and/or character evidence. Please attach any and all documents and/or things that you have obtained in response to this request.

ANSWER:

My Rights Lawyers, LLC
By: /s/ Michelle J. Douglass
Michelle J. Douglass, Esq.

DATED: July 03, 2018.

CERTIFICATION

I hereby certify that the foregoing answers to interrogatories are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

The following is a list of the identity and source of knowledge of those who provided information to me: _____.

I hereby certify that the copies of the reports annexed hereto provided by either treating physicians or proposed expert witnesses are exact copies of the entire report or reports provided by them; that the existence of other reports of said doctors or experts are unknown to me, and if such become later known or available, I shall serve them promptly on the propounding party.

DATED: _____