

IN THE CIRCUIT COUTY OF MARYLAND FOR ANNE ARUNDEL COUNTY

GEORGE WHITE

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Plaintiff

*

v.

*

Case No.: C-02-CV-21-000778

RONALD S. BATEMAN

*

Defendant

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**PLAINTIFF GEORGE WHITE'S RESPONSES TO DEFENDANT
RONALD S. BATEMAN'S FIRST SET OF INTERROGATORIES TO
PLAINTIFF GEORGE WHITE**

Comes now the Plaintiff, Alicia Fielding, by and through her attorney, Brendan Callahan, who responds to the Interrogatories provided by the Defendant, and states as follows:

A. That the information supplied in these Answers is not based solely on the knowledge of the executing party, but includes the knowledge of the party, agents, representatives and attorneys, unless privileged.

B. That the word usage and sentence structure is that of the attorney, and does not purport to be the exact language of the executing party.

C. Answers to Interrogatories furnish knowledge, facts, and information presently available to the persons answering the Interrogatories and, if subsequent or different information is obtained prior to trial, as requested, such information will be either formally or informally communicated to all parties.

General Objections

A. The undersigned objects to any Interrogatories that seek the disclosure of information protected by the attorney/client privilege, the work product doctrine, or any other applicable privilege. The inadvertent disclosure of privileged material shall not constitute a waiver of the applicable privilege.

B. The undersigned objects to these Interrogatories to the extent they call for information that is not relevant to the subject matter of this action, nor reasonably calculated to lead to the disclosure of admissible evidence, or otherwise

beyond the scope of the applicable Rules.

C. These responses to Interrogatories are made subject to inadvertent or undiscovered errors and are based upon and therefore limited by records and information still in existence, presently recollected and thus far discovered and reviewed in the course of preparing these responses. Ongoing discovery is in its earliest stage at this time. The undersigned reserves the right to make any changes to the response if it appears that inadvertent erroneous inclusions, omissions or other errors have been made or additional or more accurate information becomes available including information from ongoing discovery.

D. The undersigned objects to the Interrogatories to the extent they seek information not discoverable under the Maryland Rules.

E. Defendant objects to requests seeking “all facts,” “all documents,” or similar requests as overly broad and burdensome and an inappropriate dragnet inquiry. Such requests are extremely broad and could, and often do, encompass an incredible volume of facts, information or documents. E.g. *Espy v. Mformation Techs.*, 2009 U.S. Dist. LEXIS 81832, *20-21, No. 08-2211-EFM-DWB (D. Kan. Sept. 9, 2009); *Hiskett v. Wal-Mart Stores, Inc.*, 180 F.R.D. 403 (D. Kan. 1998); *Evans v. Johnson Hopkins Univ.*, 224 Md. 234, 167 A.2d 591 (1961).

F. Defendant objects to Plaintiff’s instructions and definitions to the extent they purport to create definitions or instructions greater than that set forth by Maryland’s discovery rules.

G. Defendant objects to Plaintiff’s Instruction and Definitions as purporting to impose obligations greater than as set forth in the Maryland Rules.

H. Each of the forgoing objections and responses applies to each individual interrogatory and is incorporated in the undersigned’s answer to each interrogatory as if fully set forth therein

RESPONSES TO INTERROGATORIES

Interrogatory No. 1: Identify each person, other than a person intended to be called as an expert witness at trial, having discoverable information that tends to support a position that you have taken or intend to take in this action, including any claim for damages, and state the subject matter of the information possessed by that person. (Standard General Interrogatory No. 1).

Response No. 1: 1) John White. Defendant forwarded information about Plaintiff to John White known to be false. He is aware of the statements, emails, and texts, made by Defendant. He is aware of the false nature of those statements, emails, and texts. Col. (Ret.)

2) William Palozzi. MSP Superintendent who received the initial call from Defendant requesting that Palozzi order Plaintiff provide passwords to Compass.

3) Charles Ardolini. Plaintiff's direct reporting supervisor. Mr. Ardolini was present when Defendant made initial call to Palozzi. He conducted Plaintiff's Job Performance Evaluation.

4) Captain Gary Mounts. Heard evidence and allegations involving false reports of crimes. Authored a Confidential Report recommending that Allied Agency investigate the allegations.

5) Det. Sergeant Kemery Hunt. Assigned Criminal Investigator into Defendant's allegations against Plaintiff.

6) Sgt. (Ret.) Dana Wegner. Investigated allegations against Plaintiff.

7) AAG Huggins. Communicated directly with Defendant about his allegations.

8) Agents of DP Solutions. Provided IT work to Compass Marketing.

9) Peggy Mekins. Employee at Compass Marketing at the time of the allegations by Defendant.

10) Eileen Burgess. Aware of Defendants false allegations about Plaintiff.

11) Kathy Barilone. Aware of Defendants false allegations about Plaintiff. Received threats made by John White regarding a plan to make allegations against Plaintiff to Internal Affairs.

12) Mike Gaudiello. IT worker in the State House. Spoke to criminal investigator regarding allegations, after which people treated Plaintiff differently at his workplace because of the investigation of Defendant's false claims.

13) Gunnar Staples. Interviewed by investigators. Knowledgeable on IT

issues at Compass Marketing.

14) Alisa Greenwood. Compass Marketing employee at the time of Plaintiff's false claims. Has knowledge of Defendant making allegations against Plaintiff.

15) John Greenwood. Compass Marketing employee at the time of Plaintiff's false claims. Has knowledge of Defendant making allegations against Plaintiff.

16) Captain Derreck Peck. Notified of false allegations against Plaintiff.

17) Lt. Col. Ruel. Received direct calls about Plaintiff from John White and/or Defendant and was told false allegations about Plaintiff.

18) ASA Colleen McGuinn. Received text from Defendant.

19) Col. Woodrow Jones. Transferred Plaintiff from Maryland General Assembly to Forestville after these allegations were made.

20) Captain Sonya Clark. Worked with Plaintiff in Maryland General Assembly. Provided Plaintiff with work appraisal after allegations made by Defendant.

21) Senate President William Ferguson. Has knowledge that Plaintiff was transferred from Maryland General Assembly after allegations by Defendant without a request from him.

Interrogatory No. 2: Identify each person whom you expect to call as an expert witness at trial, state the subject matter on which the expert is expected to testify, state the substance of the findings and opinions to which the expert is expected to testify and a summary of the grounds for each opinion, and, with respect to an expert whose findings and opinions were acquired in anticipation of litigation or for trial, summarize the qualifications of the expert, state the terms of the expert's compensation, and attach to your answers any available list of publications written by the expert and any written report made by the expert concerning the expert's findings and opinions. (Standard

General Interrogatory No. 2).

Response No. 2: None.

Interrogatory No. 3: If you intend to rely upon any documents, electronically stored information, or tangible things to support a position that you have taken or intend to take in the action, including any claim for damages, provide a brief description, by category and location, of all such documents, electronically stored information, and tangible things, and identify all persons having possession, custody, or control of them. (Standard General Interrogatory No. 3).

Response No. 3: Text messages from Defendant and John White to numerous law enforcement agencies. Text message from John White repeating that Defendant Bateman accused Plaintiff George White of felony theft. Audio recording of Plaintiff making false claims about Plaintiff. Audio recording of Gunnar Staples interview about Compass computers. Invoice from DP Solutions to Compass Marketing.

Interrogatory No. 4: Itemize and show how you calculate any economic damages claimed by you in this action, and describe any non-economic damages claimed. (Standard General Interrogatory No. 4).

Response No. 4: The nature of the allegations in this case are per se damaging, as Defendant falsely accused Plaintiff of being a criminal. Also, Plaintiff has lost opportunities and was transferred directly because of Defendant's defamation. Plaintiff's non-damages include emotional distress, loss of reputation, loss of standing in the community, personal humiliation, shame, and disgrace.

Interrogatory No. 5: Identify each person who participated in the drafting of the Complaint or the preparation of the responses to these interrogatories, including in your identification the specific paragraph(s) in the Complaint each person provided information about and the interrogatory(ies) each

person participated in preparing.

Response No. 5: Objection. This information is protected by attorney/client privilege and attorney work product.

Interrogatory No. 6: Identify and describe in detail each statement against interest or admission made by Bateman.

Response No. 6: Plaintiff is aware of the statements made by Bateman in his recorded interview with law enforcement, emails, and text messages. All will be provided in discovery.

Interrogatory No. 7: Identify and describe in detail each statement referenced in Paragraph 6 of the Complaint. In responding to this Interrogatory, state the form of communication (e.g., in-person, email, letter, phone call), date and time of the communication, to whom it was communicated, who was present for each communication, and the content of each communication.

Response No. 7: Bateman's recorded interview, emails, and text messages will be provided in discovery.

Interrogatory No. 8: Identify each of the "numerous people," "numerous third parties," "Plaintiff's co-workers," and "other people with whom Plaintiff must work on a day to day basis" referenced in Paragraph 6 of the Complaint.

Response No. 8: See Response 1, plus potentially all Compass Marketing employees at the time of the false claims,

Interrogatory No. 9: Identify and set forth all facts that support your claim that the statements allegedly made by Bateman are false and he knew each statement was false.

Response No. 9: Bateman's recorded interview reveals that claims to be specifically hired for the purpose of making a complaint against Plaintiff. Bateman provided an invoice from DP Solutions

purporting to show that DP came on May 11, 2019, one day after Plaintiff left Compass, in an effort to show that DP came to fix something Plaintiff did. In fact, DP was at Compass prior to that date and the invoice is intentionally incorrect to match that narrative. Bateman admits that John White paid him to make these claims in an effort to cause consequences for Plaintiff. Bateman's statements about Plaintiff's work schedule are demonstrably false, yet Bateman states with certainty that he knows Plaintiff's schedule. Bateman states with certainty that Plaintiff stole a computer, a hard drive, and a cell phone despite being unable to provide any corroborating details. Bateman accused Plaintiff of shutting down Compass' systems and locked out employees, at the same time that Bateman was working at Compass and business was being conducted. Bateman called ASA McQuinn prior to the investigator, Trooper Hunt, even met with her in an effort to influence the investigation.

Interrogatory No. 10: Identify and set forth all facts that support the assertions set forth in Paragraph 7 of the Complaint.

Response No. 10: Bateman admits and asserts those facts in his recorded statement.

Interrogatory No. 11: Identify describe in detail the harm to your character and reputation as referenced in Paragraph 12 of the Complaint.

Response No. 11: After Defendant's allegations, Plaintiff was transferred from a valued assignment of 14 years. Co-workers at the Maryland General Assembly began avoiding Plaintiff and behaved awkwardly toward him after Defendant's allegations. After the allegations were published in the press, Plaintiff's life has been completely different. Everyone in Plaintiff's life behaves more awkwardly than they did prior to Bateman's false allegations.

Interrogatory No. 12: Identify and describe in detail the "community" to which you refer in Paragraph 12 of the Complaint.

Response No. 12: The community consists of Plaintiff's family members, all of his co-workers at the

Maryland General Assembly and the Maryland State Police, those who heard the allegations in the Office of the Attorney General and the Anne Arundel State's Attorney office, all of southern Maryland to whom the false allegations were published in the press, all Compass employees, and all clients of Compass Marketing.

Interrogatory No. 13: Identify describe in detail the impairment to your standing and reputation in the Maryland State Police and the community as referenced in Paragraph 12 of the Complaint.

Response No. 13: See Responses 11 and 12.

Interrogatory No. 14: Identify describe in detail the mental anguish and personal humiliation you suffered as referenced in Paragraph 12 of the Complaint.

Response No. 14: Plaintiff was transferred to the least requested destination in the Maryland State Police after a successful 14 years in a much better position, which was a professional humiliation. Plaintiff had to endure a 9 month investigation by his own agency and others that resulted in him being treated differently by members of the Maryland State Police, Maryland General Assembly, Compass employees and clients, and members of the southern Maryland community. This resulted in feelings of anxiety, stress, and depression.

Interrogatory No. 15: Identify describe in detail the severe and extreme emotional distress you suffered as referenced in Paragraph 23 of the Complaint.

Response No. 15: Plaintiff was made to feel stressed, anxious, and depressed by the false allegations and subsequent 9 month investigation. Plaintiff suffered sleeplessness and constant strain from the awkwardness of treatment towards him and the fear of the impact the false accusations would have on his job, career, and reputation.

Interrogatory No. 16: Identify and set forth each and every time you accessed Compass Marketing's computer system and for what purpose since May 1, 2019.

Response No. 16: None

Interrogatory No. 17: Identify and set forth each and every time you accessed Compass Marketing's email server and for what purpose since May 1, 2019. For the purposes of responding to the Interrogatory, "email server" refers to any email address ending in "compassmarketinginc.com" and/or "compassmarketinginc.net."

Response No. 17: Plaintiff replied to multiple emails from John White on 5/1/19 and 5/2/19.

On 5/6/19 and 5/8/19 Plaintiff requested an inquiry into missing 401K funds. On 5/10/19 Plaintiff sent resignation email.

Interrogatory No. 18: Identify and set forth each and every time you accessed Compass Marketing's document management system and for what purpose since May 1, 2019.

Response No. 18: None

Interrogatory No. 19: Identify each user ID, password, or other access information you know of to access any Compass Marketing account (e.g., QuickBooks, Google) or network (e.g., document management systems, computer equipment).

Response No. 19: None

Interrogatory No. 20: Identify and describe in detail all agreements, whether written or verbal, formal or informal, you had concerning the security services and/or driving services you provided to Senator Mike Miller.

Response No. 20: None

Dated: March 23, 2022

Respectfully submitted,

/s/ Brendan M. Callahan

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I DO SOLEMNLY AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE ANSWERS CONTAINED IN THESE RESPONSES TO INTERROGATORIES ARE TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE, INFORMATION, AND BELIEF.

/s/ George White