

ROBERT BURNS

NUMBER 602.922 DOCKET: 25

19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

SANDY EDMONDS

STATE OF LOUISIANA

MEMORANDUM: DEFENDANT'S RESPONSES TO PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR ADMISSIONS OF FACT

May it please the Court:

Petitioner files this Memorandum in order to enter into the Court's record Exhibits P-45, Defendant's Response to Plaintiff's First Set of Interrogatories and P-46, Defendant's Response to Plaintiff's First Set for Requests for Admissions of Fact. Petitioner will likely reference these exhibits in his Memorandum in Opposition to No Cause of Action and Improper Service, which is scheduled for hearing on Monday, April 16, 2012 at 9:30 a.m. before this Honorable Court and desired to have the Exhibits pre-filed.

CERTIFIED TRUE COPY
6-28-13
DEPUTY CLERK OF COURT

Respectfully Submitted,

Robert Edwin Burns, in proper person
President, Auction Sells Fast, LLC
4155 Essen Lane, Ste 228
Baton Rouge, LA 70809-2152
(225) 201-0390 (office) (225) 235-4346
E-mail: Robert@AuctionSellsFast.com

Robert Edwin Burns

19TH JUDICIAL DISTRICT
EAST BATON ROUGE PARISH, LA
FILED

2012 JAN 24 PM 2:36

BY
DEPUTY CLERK & RECORDER FOR
DOUG WELBORN
CLERK OF COURT F B R PARISH

Certificate of Service:

I certify that a copy of the foregoing has been served upon counsel for all parties to this proceeding by mailing the same to each by First Class United States Mail, properly addressed and postage prepaid on this 24th day of January 2012.

Robert Edwin Burns

ROBERT BURNS

NUMBER 602,922 SECTION 25

VERSUS

19TH JUDICIAL DISTRICT COURT

SANDY EDMONDS

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**DEFENDANT'S RESPONSES TO PLAINTIFF'S
FIRST SET OF INTERROGATORIES**

NOW INTO COURT, through undersigned counsel, comes defendant, Sandy Edmonds, who responds to plaintiff's First Set of Interrogatories as follows:

INTERROGATORY NUMBER ONE:

Please state exactly how you came to obtain knowledge that Robert Edwin Burns had visited the Boardroom located at 5222 Summa Court the week of April 4, 2011 – April 8, 2011.

RESPONSE TO INTERROGATORY NUMBER ONE:

Defendant objects to this Interrogatory, as it seeks privileged information gathered and prepared in anticipation of litigation and in preparation for legal proceedings which is protected by the attorney work product privilege and information which reflects the mental impressions, conclusions, opinions, or legal theories of the attorney for the defendants or other representatives of the defendant. In further response, without waiving any objections, but specifically reserving same, defendant responds as follows: Ms. Karen Kennedy informed me of your visit.

Defendant reserve the right to supplement this response at a later date.

INTERROGATORY NUMBER TWO:

Please state the dates, approximate times, general natures, and names of any individuals with whom you engaged in conversations regarding visits to the Boardroom located at 5222 Summa Court by Robert Edwin Burns between the dates of Monday, April 4, 2011 and Friday, April 5, 2011. Such names should, if applicable, but not be limited to, the following individuals: Karen Kennedy, Caroline Messenger, Anna Dow, James Kenneth Comer, Steve Winkler, Beau Box, and Chuck Mock.

RESPONSE TO INTERROGATORY NUMBER TWO:

Defendant objects to this Interrogatory, as it seeks privileged information gathered and prepared in anticipation of litigation and in preparation for legal proceedings which is protected

by the attorney work product privilege and information which reflects the mental impressions, conclusions, opinions, or legal theories of the attorney for the defendants or other representatives of the defendant. In further response, without waiving any objections, but specifically reserving same, defendant responds as follows: On Friday, April 8, 2011, I spoke with Karen Kennedy around 4:00 p.m. She phoned to let me know her feelings were that you were “faking portions of a board meeting”. Based on that conversation, I then phoned Ken Comer and Anna Dow. Monday morning, April 11, 2011, I spoke with Ken Comer and Anna Dow. I phoned the EBRP Sheriff’s office at the direction of Chairman Comer. I then spoke with Karen Kennedy and Caroline Messenger to let them know an EBRP sheriff was on his way. Tuesday, April 12, 2011, I spoke early with Anna Dow and Ken Comer. I was directed to phone the State Police, as recommended by the Attorney General’s office. I also phoned Chuck Mock, Realtor with Beau Box Commercial Real Estate. Defendant reserves the right to supplement this response at a later date.

INTERROGATORY NUMBER THREE:

Please state who supplied the quoted words “fake board meetings” on page eight (8) of the narrative section of the EBRP Sheriff’s Office police report approved by Ernest Soileau on April 17, 2011 (Exhibit P-5 of the petition).

RESPONSE TO INTERROGATORY NUMBER THREE:

Defendant objects to this Interrogatory, as it seeks privileged information gathered and prepared in anticipation of litigation and in preparation for legal proceedings which is protected by the attorney work product privilege and information which reflects the mental impressions, conclusions, opinions, or legal theories of the attorney for the defendants or other representatives of the defendant. In further response, without waiving any objections, but specifically reserving same, defendant responds as follows: Karen Kennedy. Defendant reserves the right to supplement this response at a later date.

INTERROGATORY NUMBER FOUR:

Please state whether you were in the building located at 5222 Summa Court at any time while Robert Edwin Burns was at the Boardroom of that facility filming video clips during the

week of April 4, 2011 – April 8, 2011. If so, please specify the timeframe(s) during which you were inside the building during those visits.

RESPONSE TO INTERROGATORY NUMBER FOUR:

No.

INTERROGATORY NUMBER FIVE:

Please state with specificity how Robert Edwin Burns “disturbed the peace” as you complained of in EBRP Sheriff’s Office police report approved by Earnest Soileau on April 17, 2011.

RESPONSE TO INTERROGATORY NUMBER FIVE:

I phoned the police and told them there was an allegation that someone was faking portions of a board meeting. When the police arrived, I told them I was not in the building when the situation occurred and that he would need to speak with Karen Kennedy and Caroline Messenger. It is the officer who decided to label the situation as “disturbing the peace” and “wrongful use of public property”.

INTERROGATORY NUMBER SIX:

Please state with specificity how Robert Edwin Burns engaged in “wrongful use of public property” as you complained of in EBRP Sheriff’s Office police report approved by Earnest Soileau on April 17, 2011.

RESPONSE TO INTERROGATORY NUMBER SIX:

See response to Interrogatory Number Five.

INTERROGATORY NUMBER SEVEN:

From the time of your employment with the Interior Design Board forward, including the period in which you have been employed with the LALB, please provide the dates during which you took vacations to Disneyworld or other vacation destinations during your employ with either or both agencies.

RESPONSE TO INTERROGATORY NUMBER SEVEN:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable, and will not lead to discoverable information.

INTERROGATORY NUMBER EIGHT:

For each of the itemized timeframe supplied in response to Interrogatory Number Seven, please state whether or not any annual leave was taken from either agency during these vacations. If so, please supply the number of hours of annual leave taken, as well as any substantiating documentation that annual leave was utilized.

RESPONSE TO INTERROGATORY NUMBER EIGHT:

See response to Interrogatory Number Seven.

INTERROGATORY NUMBER NINE:

From the time of your employment with the Interior Design Board and the LALB, please indicate dates at which you attended conferences or other similar functions (including continuing education for licensees) and the number of hours at which you attended the conferences or other similar functions for each Board.

RESPONSE TO INTERROGATORY NUMBER NINE:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable, and will not lead to discoverable information.

INTERROGATORY NUMBER TEN:

For each itemized timeframe supplied in response to Interrogatory Number Nine, please state whether or not any annual leave was taken from the agency for which you were not attending a conference or attending other similar functions (e.g. annual leave taken with the Interior Design Board while attending a conference as a representative of the LALB). If any annual leave was taken, please supply the number of hours of annual leave taken as being applicable for the other agency, as well as any substantiating documentation that annual leave was utilized.

RESPONSE TO INTERROGATORY NUMBER TEN:

See response to Interrogatory Number Nine.

INTERROGATORY NUMBER ELEVEN:

From the time of your employment with the LALB on or around August 10, 2009 forward, please indicate any instance in which you have expanded the minutes of an LALB meeting to include substantive discussion (i.e. beyond notating motions, seconds, and votes)

other than August 2, 2010, Item five (5) under “new business” when you quoted Board Member Freddie Phillips verbatim. Also please indicate whether your action in that instance was contrary to the first vote of the meeting which was a motion to expand the minutes to include specificity and was defeated by a vote of 4-2.

RESPONSE TO INTERROGATORY NUMBER ELEVEN:

As Executive Assistant/Secretary I have no authority to expand the minutes of an LALB meeting.

INTERROGATORY NUMBER TWELVE:

Please state the names and ages of your children and whether or not those children have ever accompanied you to the building at 5222 Summa Court when you came to that building to perform office duties for the LALB or Interior Design Board.

RESPONSE TO INTERROGATORY NUMBER TWELVE:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable, and will not lead to discoverable information.

INTERROGATORY NUMBER THIRTEEN:

Please state whether, for each of the following calendar years, you provided care for your children, and any approximate number of hours such care was provided, at home or at the offices of 5222 Summa Court while performing office duties from home or offices located at 5222 Summa Court for the LALB or Interior Design Board: 2007, 2008, 2008, 2010, 2011.

RESPONSE TO INTERROGATORY NUMBER THIRTEEN:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable, and will not lead to discoverable information.

INTERROGATORY NUMBER FOURTEEN:

Please state the number of hours and timeframes that your husband typically works at either of his two vocations of teaching at LSU or as partner at his Interior design firm.

RESPONSE TO INTERROGATORY NUMBER FOURTEEN:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable, and will not lead to discoverable information.

INTERROGATORY NUMBER FIFTEEN:

Please indicate whether you failed to detect the fact that auctioneer Ken Buhler lacked a Louisiana voter's registration at the time he applied for reinstatement of his residential license or whether you did detect the fact he lacked such a Louisiana voter's registration and were instructed to overlook that fact and not mention it at the LALB meeting of September 20, 2010.

RESPONSE TO INTERROGATORY NUMBER FIFTEEN:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER SIXTEEN:

Please indicate the basis for your inquiry of the Louisiana Board of Ethics in a letter dated June 2, 2010 in which you inquired of that Board as to whether Robert Edwin Burns may have violated LSA – R.S. 24:56(F) regarding testimony he provided before a Legislative Committee on May 18, 2010.

RESPONSE TO INTERROGATORY NUMBER SIXTEEN:

Defendant objects to this Interrogatory as irrelevant and immaterial.

INTERROGATORY NUMBER SEVENTEEN:

Please indicate the basis for the following verbatim quotation which you made at the July 18, 2011 meeting of the Louisiana Auctioneer's Licensing Board as evidenced by the audio tape of that meeting: "Now that I've got Mr. Phillips, Mr. Burns, and his video camera and because of them attending the Interior Design Board Meetings, I now have [EBRP] Deputy Landry there also." In indicating your rationale, please provide any date, time, and nature of any statement made or act initiated by Robert Edwin Burns or Freddie Phillips prompting you to believe a need for security exists as a result of their presence at Interior Design Board meetings.

RESPONSE TO INTERROGATORY NUMBER SEVENTEEN:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER EIGHTEEN:

Please indicate, given the seriousness which would be obvious entailing your action of having the EBRP Sheriff's Office called out to the LALB on Monday, April 11, 2011 relating to incidents the prior week, why no item was placed on the LALB agenda for its June 20, 2011 meeting pertaining to your report filed with the EBRP Sheriff's Office.

RESPONSE TO INTERROGATORY NUMBER EIGHTEEN:

Chairman Kenneth Comer put items on the agenda, not me as Executive Assistant/Secretary.

INTERROGATORY NUMBER NINETEEN:

Please indicate who may have been responsible for telephoning the police on April 19, 2003 when you and your husband, Matthew Edmonds, were at an apartment complex which you owned jointly at 1612 Cedar Lake Avenue.

RESPONSE TO INTERROGATORY NUMBER NINETEEN:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable and will not lead to discoverable information.

INTERROGATORY NUMBER TWENTY:

Please indicate if the ultimate outcome of the police call pertaining to Interrogatory Number Nineteen was that your husband, Matthew Edmonds, was placed under arrest for simple battery and entering and remaining after being forbidden.

RESPONSE TO INTERROGATORY NUMBER TWENTY:

Defendant object to this Interrogatory as being confidential, irrelevant, undiscoverable and will not lead to discoverable information.

INTERROGATORY NUMBER TWENTY ONE:

Please state the approximate amount of time you spent at the office with auctioneer Dan Mahaney in providing the license he received from the LALB to conduct a real estate auction in the French Quarter of New Orleans in July of 2010.

RESPONSE TO INTERROGATORY NUMBER TWENTY ONE:

Defendant objects to this Interrogatory as being confidential, irrelevant, undiscoverable and will not lead to discoverable information.

INTERROGATORY NUMBER TWENTY TWO:

Given that you clearly indicated at the August 2, 2010 LALB meeting, as reflected on the audio tape of that meeting, that Ms. Anna Dow, LALB attorney, did not forward to you Board Member Phillips certified letter requesting LALB travel record compilations, please indicate how and when you became aware of Mr. Phillips' request and of what those parameters were in producing computer printouts which you provided to Mr. Phillips on or around September 20, 2010 and October 21, 2010.

RESPONSE TO INTERROGATORY NUMBER TWENTY TWO:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER TWENTY THREE:

Please state whether or not you engaged in any conversation(s) with then-LALB Chairman James Kenneth Comer prior to or on May 17, 2010 regarding who all may be permitted to attend the National Auctioneer's Licensing Law Official's Agency (NALLOA) conference in July of 2010. If any such conversations took place, please state the nature of those conversations to include any specific names referenced in the any such conversations and whether any statements were made by either of you regarding any such individuals attending the conference.

RESPONSE TO INTERROGATORY NUMBER TWENTY THREE:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER TWENTY FOUR:

Please indicate whether or not you spoke with LALB Member Freddie Phillips regarding him visiting the LALB Office on Wednesday, June 9, 2010 to inspect LALB records of interest to him. If so, please indicate what the contents of your conversation with him entailed.

RESPONSE TO INTERROGATORY NUMBER TWENTY FOUR:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

INTERROGATORY NUMBER TWENTY FIVE:

Please indicate what position Ms. Liz Joiner holds at the Louisiana State Department of Civil Service.

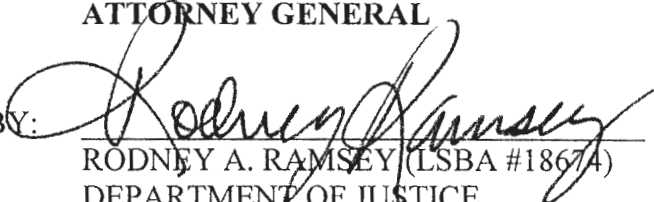
RESPONSE TO INTERROGATORY NUMBER TWENTY FIVE:

Defendant objects to this Interrogatory as it is overbroad, unduly burdensome, and irrelevant, as the information sought is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted:

**JAMES D. "BUDDY" CALDWELL
ATTORNEY GENERAL**

BY:

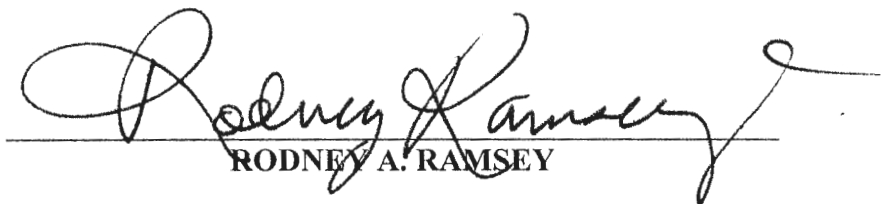

RODNEY A. RAMSEY (LSBA #18674)
DEPARTMENT OF JUSTICE
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Post Office Box 94005
Baton Rouge, LA 70804-9005
1885 North Third Street, 3rd Floor, 70802
Telephone: (225) 326-6386
Facsimile: (225) 326-6494

CERTIFICATE OF SERVICE

I hereby certify that a copy of the above and foregoing Defendant's Responses to Plaintiff's First Set of Interrogatories has been served upon pro se plaintiff, Robert Burns, by depositing same in the U. S. Mail, properly addressed, and postage prepaid to:

Robert Edwin Burns, In Proper Person
President, Auction Sells Fast, LLC
4155 Essen Lane, Suite 228
Baton Rouge, Louisiana 70809-2152

this 11th day of January, 2012.



RODNEY A. RAMSEY

ROBERT BURNS

NUMBER 602,922 SECTION 25

VERSUS

19TH JUDICIAL DISTRICT COURT

SANDY EDMONDS

PARISH OF EAST BATON ROUGE

STATE OF LOUISIANA

**DEFENDANTS' RESPONSE TO PLAINTIFF'S
REQUEST FOR ADMISSIONS OF FACTS**

NOW INTO COURT, through undersigned counsel, comes defendant, Sandy Edmonds, who responds to plaintiffs' Request for Admissions of Facts as follows:

REQUEST FOR ADMISSION NUMBER ONE:

Please admit that you received an email from Robert Edwin Burns dated April 7, 2011 (four days prior to your filing of a complaint with the EBRP Sheriff's Office against Mr. Burns) which contained a spreadsheet of past travel history of LALB members as had been initially requested by LALB Member Freddie Phillips on May 28, 2010.

RESPONSE TO REQUEST FOR ADMISSION NUMBER ONE:

Defendant objects to Admission Number One on the grounds that the information/documentation sought in this Request for Admission is equally available to the propounding party. Furthermore, this request is neither relevant to the subject matter of this lawsuit, nor is it reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWO:

Please admit that the spreadsheet referenced in Admission Number One was accompanied by a sworn affidavit executed by Robert Edwin Burns attesting to the fact that the spreadsheet required two hours and four minutes to prepare and that, to the absolute best of his knowledge and belief, the spreadsheet was accurate and that the procedure was, at the request of the LALB, overseen by Attorney General Paralegal Cheryl Harrison.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWO:

Defendant objects to Admission Number Two on the grounds that the information/documentation sought in said Admission is irrelevant and immaterial to the subject

matter of this lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THREE:

Please admit that, on two prior occasions, on or about September 21, 2010 and October 21, 2010, you produced computer printouts for Board Member Freddie Phillips in attempts to provide him with past travel record information regarding LALB travel for NAA / NALLOA conferences.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THREE:

Defendant objects to Admission Number Three on the grounds that the computer printouts for Board Member Freddie Phillips' travel record of September 21, 2010 and October 21, 2010 regarding the LALB travel for NAA/NALLOA conferences is irrelevant and immaterial to the subject matter of this lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FOUR:

Please admit that both of those computer printouts referenced in Admission Number Three bore no resemblance to the spreadsheet provided to you on April 7, 2011 prepared by Robert Edwin Burns.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FOUR:

Defendant object to Admission Number Four on the grounds that the computer printouts bore any resemblance to the spreadsheet provide on April 7, 2011 prepared by Robert Edwin Burns is irrelevant to the subject matter of this lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIVE:

Please admit that, contrary to assertions made by LALB attorney Anna Dow in pleadings in 19th Judicial District Court, no "specialized computer programming" was required for Robert Edwin Burns to prepare the spreadsheet which you were provided on April 7, 2011 (four days prior to your filing of the EBRP Sheriff Police Report by you against Robert Edwin Burns).

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIVE:

Defendant objects to Admission Number Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIX:

Please admit that you relayed to Robert Edwin Burns in an email you sent to him on April 4, 2011 (seven days prior to your filing of the complaint with the EBRP Sheriff's Office against Mr. Burns) the following verbatim quote: "Although Ms. Dow [LALB attorney] did state her contention is that the Board is under no obligation to generate a report for Mr. Phillips, one was generated by myself on October 21, 2010 and forwarded to Ms. Dow to send to Mr. Phillips. However, a report only generates what is entered into the system and unfortunately there are times that travel was paid and descriptions not listed. Therefore, the report is not, in my view, a complete picture of what occurred."

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIX:

Defendant objects to Admission Number Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVEN:

Please admit that the spreadsheet referenced in Admission Number One was comprised of fifteen (15) line-item entries of past NAA / NALLOA travel by LALB members covering the period January 1, 2000 through April 7, 2011.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVEN:

Defendant objects to Admission Number Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHT:

Please admit that, as evidenced by the audio tape of the meeting, at the August 2, 2010 LALB meeting, you stated to Board Member Freddie Phillips regarding his request for travel records dated May 28, 2010: "I want to help you."

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHT:

Defendant objects to Admission Number Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINE:

Please admit that, just over five (5) months later, as evidenced by the audio tape of the meeting, at the January 10, 2011 LALB meeting, you spoke in favor of an item that you requested be added to the LALB agenda of that same date regarding records destruction.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINE:

Defendant objects to Admission Number Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TEN:

Please admit that, as evidenced by the audio tape of the meeting, as that January 10, 2011 LALB meeting, you justified your desire for a records destruction policy in making the following verbatim quote to Board Member Freddie Phillips: "I am time and time again having to go through boxes to pull records that this office shouldn't even have."

RESPONSE TO REQUEST FOR ADMISSION NUMBER TEN:

Defendant objects to Admission Number Ten on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER ELEVEN:

Please admit that, as evidenced by the audio tape of the meeting, at that January 10, 2011 LALB meeting, you further stated, in directly addressing Board Member Freddie Phillips: "They [Freedom of Information Act Requests] may not all be from you, but your friend in crime.....your partner back there [referencing Robert Edwin Burns], you two take turns requesting documents."

RESPONSE TO REQUEST FOR ADMISSION NUMBER ELEVEN:

Defendant objects to Admission Number Eleven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWELVE:

Please admit that you inquired of Board Member Freddie Phillips, LALB Member, at the March 21, 2011 as evidenced by the audio tape of the meeting, as to “why would the Board choose you as a representative given that you’re suing the Board?”

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWELVE:

Defendant objects to Admission Number Twelve on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTEEN:

Please admit that, as that same LALB meeting on March 21, 2011 referenced in Admission Request Number Twelve, WAFB investigative reporters Paul Gates and David Spunt attended the meeting, filmed a portion of its opening, and Messrs. Gates and Spunt asked questions of Ms. Anna Dow, LALB attorney.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTEEN:

Defendant objects to Admission Number Thirteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FOURTEEN:

Please admit that, Ms. Dow informed the LALB at that March 21, 2011 LALB meeting of her interview with reports, which was conducted prior to the meeting, the record reflects (as recorded on audio of the LALB meeting) that Ms. Dow stated that she was asked by the reporters to comment on those reporters’ inquiry that Board Member Phillips “has been treated differently because of his race.”

RESPONSE TO REQUEST FOR ADMISSION NUMBER FOURTEEN:

Defendant objects to Admission Number Fourteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTEEN:

Please admit that you informed Robert Edwin Burns during the timeframe of early March of 2010 that you had copied a work paper inadvertently left behind by the Louisiana Office of Inspector General concerning an active investigation of the LALB and that you “had no misgivings” about your action because “the work paper was merely left lying there and I made no effort to pry it away from them.”

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTEEN:

Defendant objects to Admission Number Fifteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTEEN:

Please admit that the work paper referenced in Admission Number Fifteen, while not directly naming an LALB complainant, described the position of the complainant such that it could be only one person: former LALB Executive Director, Sherrie Wilks.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTEEN:

Defendant objects to Admission Number Sixteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTEEN:

Please admit that, during an office meeting for purposes of reformulating the LALB licensing exam in early March of 2010 and while in the company of Board Member Freddie Phillips, you did hand your copy of that work paper to Robert Edwin Burns for him to briefly view and confirm the authenticity of what you had relayed verbally to him previously regarding that work paper.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTEEN:

Defendant object to Admission Number Seventeen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTEEN:

Please admit that you relayed to Robert Edwin Burns in early March of 2010 that you had read the contents of the Inspector General Work paper referenced in Admission Number Fifteen to then-LALB Chairman James Kenneth Comer.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTEEN:

Defendant objects to Admission Number Eighteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETEEN:

Please admit that, at the conclusion of the LALB meeting of August 17, 2009, you inquired of then-Board Member Robert Edwin Burns, in the direct presence of Board Member Freddie Phillips, as to whether he (Burns) was a signatory on the checkbook of the LALB.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETEEN:

Defendant objects to Admission Number Nineteen on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY:

Please admit that, at the time of your inquiry regarding Admission Number Nineteen, you were aware that LALB Member Freddie Phillips, who was standing directly beside you when you made the inquiry, served as Treasurer of the LALB.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY:

Defendant objects to Admission Number Twenty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY ONE:

Please admit that, in the first approximate 30 days of your employ with the LALB, you requested that LALB Secretary-Treasurer Freddie Phillips sign approximately 8-10 checks, generally at locations away from the LALB's office, and that, thereafter, you began rubber stamping then-Chairman Ken Comer's name on LALB checks, thereby circumventing the LALB's internal control requirement that two authentic signatures be obtained on all LALB checks.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY ONE:

Defendant objects to Admission Number Twenty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY TWO:

Please admit that, at the LALB meeting of August 2, 2010, as reflected in the audio tape of the meeting, a motion was made at the meeting's outset by Board Member Robert Edwin Burns and seconded by Board Member Freddie Phillips to expand the minutes of that meeting to include specificity regarding Board discussion instead of merely notating in the minutes the motions, seconds, and votes applicable for that meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY TWO:

Defendant objects to Admission Number Twenty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY THREE:

Please admit that the motion referenced in Admission Number Twenty Two, as evidenced by the audio and minutes of that meeting, failed by a vote of 4-2, with Board Members Burns and Phillips being the only affirmative votes.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY THREE:

Defendant objects to Admission Number Twenty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY FOUR:

Please admit that, the request for Admission Number Twenty Two and Admission Number Twenty Three notwithstanding, as reflected by the minutes of the meeting, you expanded the minutes of the August 2, 2010 meeting regarding Item Five (5) under “New Business,” which was entitled, “Complaint Against Board regarding Robert Burns” to include a verbatim quote of Board Member Freddie Phillips.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY FOUR:

Defendant objects to Admission Number Twenty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY FIVE:

Regarding your quoting of Board Member Phillips referenced in Admission Number Twenty Four, as reflected in the audio tape of the meeting, please admit that Board Member Phillips provided commentary both before and after the commentary you quoted which was not included in your verbatim quote in the minutes you prepared for the August 2, 2010 LALB meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY FIVE:

Defendant objects to Admission Number Twenty Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY SIX:

Please admit that, at that same LALB meeting of August 2, 2010, as reflected in the audio tape of the meeting, LALB Vice Chairman Tessa Steinkamp made the following verbatim quote: “Freddie, I wouldn’t want you representing this Board,” yet that quote was not contained in the minutes you prepared for that LALB meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY SIX:

Defendant objects to Admission Number Twenty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBERTWENTY SEVEN:

Please admit that, at that same LALB meeting of August 2, 2010, as reflected in the audio tape of that meeting, former long-time Chairman Buster Gay relayed that he wouldn't want to send someone to the convention who may "embarrass" the LALB and relayed he had voted against sending LALB Member Freddie Phillips to the convention because Mr. Phillips "filed a deal with the Baton Rouge Police Department saying someone hypnotized you and had you withdraw \$7,000 out of your church's account and give it to them," yet that quote failed to be included in the minutes you prepared for that LALB meeting of August 2, 2010.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY SEVEN:

Defendant objects to Admission Number Twenty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY EIGHT:

Please admit that, at the same LALB meeting of August 2, 2010, as reflected in the audio tape of the meeting, both then-Chairman Ken Comer and former long-time Chairman Buster Gay openly and repeatedly questioned why Board Member Phillips was requesting past LALB travel records with Mr. Gay saying, "Why is all this necessary?" and Ken Comer stating, "That's what I wonder. That's exactly what I wonder," and Ken Comer also stating to Board Member Phillips, "Bring it on....Go get your attorney and bring it on because I'm tired of being accused...I'm tired of being harassed," yet those quotes also failed to be included in the minutes you prepared for that LALB meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY EIGHT:

Defendant objects to Admission Number Twenty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER TWENTY NINE:

Please admit that, upon those minutes of the August 2, 2010 LALB meeting being approved, you received an email from Robert Edwin Burns dated October 21, 2010 expressing

his formal objection to the minutes you prepared referenced in Admissions Twenty Two through Twenty Eight.

RESPONSE TO REQUEST FOR ADMISSION NUMBER TWENTY NINE:

Defendant objects to Admission Number Twenty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY:

Please admit that, seven (7) days after the LALB meeting of August 2, 2010, LALB Member Freddie Phillips filed a Writ of Mandamus against the LALB seeking to force the LALB to provide him with LALB travel records.

RESPONSE TO REQUEST FOR ADMISSION NUMBERS THIRTY:

Defendant objects to Admission Number Thirty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY ONE:

Please admit that former long-term chairman Buster Gay resigned from the LALB during the timeframe of late February of 2011 to early March of 2011.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY ONE:

Defendant objects to Admission Number Thirty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY TWO:

Please admit that, at the August 2, 2010 LALB meeting, as reflected in the audio tape of that meeting, you stated that Ms. Anna Dow, LALB attorney, had not forwarded to you a certified letter that she received from Board Member Freddie Phillips dated May 28, 2010 specifying the parameters of travel records which he was seeking from the LALB.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY TWO:

Defendant objects to Admission Number Thirty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY THREE:

Please admit that you arranged for an LALB office visit on the part of Robert Edwin Burns which was conducted on Wednesday, June 9, 2010 in which a number of items requested to be reviewed by Robert Edwin Burns dealt with past LALB travel records which were of interest to LALB Member Freddie Phillips.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY THREE

Defendant objects to Admission Number Thirty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY FOUR:

Please admit that, on June 18, 2010, nine (9) days after the office visit referenced in Admission Number Thirty Three and 21 days after Board Member Freddie Phillips sent a certified letter to LALB attorney Anna Dow requesting LALB travel records, then-Chairman Ken Comer requested that you mail a letter to all LALB members relaying that no Board Member would be provided access to LALB records without contacting him first and obtaining his approval and that you did in fact mail such a letter to all LALB members with then-Chairman Comer's signature on the letter.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY FOUR:

Defendant objects to Admission Number Thirty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY FIVE:

Please admit that, at the January 11, 2011 LALB meeting, as reflected on the audio tape of that meeting, Anna Dow, LALB attorney, made several outright threats of litigation directed at Board Member Freddie Phillips for his questioning of her billing the LALB for attendance at

the 2010 NALLO conference without LALB approval as being a potential misappropriation of funds. These quotes included, "No, the lawsuit will notify you of what you said!" The quotes also included: "I think that's clarified sufficiently....So you're accusing him [then-Chairman Comer]" of misappropriation of funds....We'll do that [answer the question of who approved Ms. Dow's travel] through future litigation."

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY FIVE:

Defendant objects to Admission Number Thirty Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY SIX:

Please admit that, also at the January 11, 2011 LALB meeting, then-Chairman Ken Comer also made overt threats of litigation against Board Member Freddie Phillips after inquiring several times if Board Member Phillips may be accusing him of misappropriation of funds. Those quotes include, "You accusing me of misappropriation of funds?" The quotes also include, "No, I'm asking you a question," and "Oh, you will [answer me]. You may not do it here, but..."

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY SIX:

Defendant objects to Admission Number Thirty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY SEVEN:

Please admit that the LALB meeting of January 11, 2011 was the last one attended by then-Chairman Ken Comer and that he resigned from the LALB effective June 17, 2011.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY SEVEN:

Defendant objects to Admission Number Thirty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY EIGHT:

Please admit that Board Member Freddie Phillips was quoted extensive by Advocate reporter Ted Griggs in an article entitled “Auctioneer Board Member Opposes Dealer’s License” which ran in the October 15, 2010 edition wherein Board Member Phillips sharply criticized the fact that auctioneer Ken Buhler obtained a Louisiana residential license when the voter registration he supplied for obtaining that license was in fact a Texas voter’s registration.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY EIGHT:

Defendant objects to Admission Number Thirty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER THIRTY NINE:

Please admit that you failed to indicated to the LALB at the September 20, 2010 LALB meeting that Mr. Buhler did not qualify for a Louisiana residential license due to his failure to supply a Louisiana voter’s registration.

RESPONSE TO REQUEST FOR ADMISSION NUMBER THIRTY NINE:

Defendant objects to Admission Number Thirty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY:

Please admit that, as part of your duties as Executive Assistant of the LALB, you are responsible for screening applications and documentation of new licenses or reinstated licenses to ensure the proper documentation is in the applicant’s file and that, for a Louisiana residential license, such documentation should include a Louisiana voter’s registration.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY

Defendant objects to Admission Number Forty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY ONE:

Please admit that you received a letter from Board Member Freddie Phillips dated October 4, 2010 in which he assessed the blame for the Buhler oversight squarely on you and questioned whether you failed to detect the obviously-missing required proper voter registration and that you may therefore be in need of “remedial training” or whether you were aware of the missing document and had been advised to overlook that fact.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY ONE:

Defendant objects to Admission Number Forty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY TWO:

Please admit that, at the December 6, 2010 LALB meeting, a reconsideration of auctioneer Ken Buhler’s license application transpired, with the result being that he was issued a nonresidential license.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY TWO:

Defendant objects to Admission Number Forty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY THREE:

Please admit that, in the letter referenced in Admission Number Forty One, Board Member Phillips also relayed that auctioneer Dan Mahaney, an auctioneer from Indiana who applied for a Louisianan license to conduct a real estate auction in the French Quarter of New Orleans in July of 2010, was not issued a firm license for conducting such a real estate auction.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY THREE:

Defendant objects to Admission Number Forty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY FOUR:

Please admit that you never inquired of Mr. Mahaney as to whether he operated a company and may be in need of a firm license to conduct an auction in Louisiana.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY FOUR:

Defendant objects to Admission Number Forty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY FIVE:

Plases admit that, upon Mr. Mahaney being informed that he lacked the proper licensing requirements, he was advised by either you or LALB legal counsel Anna Dow that he had two choices: either postpone the auction or enter into a co-listing with a Louisiana-based auctioneer.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY FIVE:

Defendant objects to Admission Number Forty Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY SIX:

Please admit that Mr. Mahaney opted for the latter option and entered into a co-listing agreement with Dave Gilmore, a real estate auctioneer based in Kenner, Louisiana.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY SIX:

Defendant objects to Admission Number Forty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY SEVEN:

Please admit that the processing of Mr. Mahaney's license entailed you and he agreeing upon a time to meet at the LALB office, him arriving first and waiting for you, and you going in with him, printing out the license, and each of you proceeding on out of the building at 5222 Summa Court.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY SEVEN:

Defendant objects to Admission Number Forty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY EIGHT:

Please admit that, in the letter you received from Board Member Freddie Phillips dated October 4, 2010 and referenced in Admission Number Forty One, Mr. Phillips also referenced the Dan Mahaney incident in relaying a need for “remedial training” may exist regarding your performance on that matter as well as the application of Ken Buhler irregularity.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY EIGHT:

Defendant objects to Admission Number Forty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FORTY NINE:

Please admit that an attempted-delivery receipt from the United States Post Office pertaining to a certified letter from the Louisiana Ethics Board was obtained by you as an agent of the Louisiana Auctioneer’s Licensing Board pertaining to a certified letter addressed to Robert Edwin Burns from the Ethics Board, with that letter dated January 31, 2011.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FORTY NINE:

Defendant objects to Admission Number Forty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY:

Please admit that, pertaining to the certified letter referenced in Admission Number Forty Nine, you neither signed for the delivery at the United States Post Office nor did you notify Robert Edwin Burns of any pending certified letter addressed to him from the Louisiana Ethics Board.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY:

Defendant object to Admission Number Fifty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY ONE:

Please admit that a follow-up letter sent via regular mail from the Louisiana Ethics Board dated February 24, 2011 was received by you as an agent for the Louisiana Auctioneer's Licensing Board.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY ONE:

Defendant objects to Admission Number Fifty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence. Defendant further objects on the ground that it calls for a legal opinion.

REQUEST FOR ADMISSION NUMBER FIFTY TWO:

Please admit that, pertaining to the letter referenced in Admission Number Fifty One, you made no effort whatsoever to notify Robert Edwin Burns of the regular-mail letter sent to him by the Louisiana Board of Ethics.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY TWO:

Defendant objects to Admission Number Fifty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY THREE:

Please admit that you were in receipt of an official complaint against the LALB dated March 9, 2011 authored by Robert Edwin Burns pertaining to your inaction regarding failing to notify him of any attempted mail deliveries to him on the part of the Louisiana Board of Ethics.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY THREE:

Defendant objects to Admission Number Fifty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY FOUR:

Please admit that, pertaining to the complaint referenced in Admission Number Fifty Three, as reflected in the audio tape of the meeting, Robert Edwin Burns attempted to have the matter discussed by the LALB at its regular meeting on March 21, 2011 with the result being that Ms. Steinkamp, serving as Acting Chairman and as Chairman for that meeting in the absence of then-Chairman James Kenneth Comer, stated to Robert Edwin Burns that the matter would not be discussed since it was not on the agenda.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY FOUR:

Defendant objects to Admission Number Fifty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY FIVE:

Please admit that, pertaining to the complaint referenced in Admission Number Fifty Three, the matter was never placed on the LALB's agenda and no action of any kind was ever taken by the LALB.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY FIVE:

Defendant objects to Admission Number Fifty Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY SIX:

Please admit that, on Friday, April 10, 2010, you did telephone Robert Edwin Burns, a sitting Board Member of the LALB, at approximately 3:00 p.m. and request of him that he testify in opposition HB 1439, which was a bill by Rep. Damon Baldone to dramatically increase the penalties for shill bidding in Louisiana.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY SIX:

Defendant objects to Admission Number Fifty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY SEVEN:

Please admit that you have knowledge of the State of Louisiana's Code of Governmental Ethics which prohibits the recruitment of licensees by a State Agency which regulates those licensees for purposes of lobbying Legislators.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY SEVEN:

Defendant objects to Admission Number Fifty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY EIGHT:

Please admit that, as Executive Assistant of the LALB, you have knowledge of Auctioneering Licensing Law Sections 3129 and 3130 entailing the illegality of the use of shills, cappers, or boosters at auctions in Louisiana.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY EIGHT:

Defendant objects to Admission Number Fifty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER FIFTY NINE:

Please admit that, regarding the telephone call you made to Robert Edwin Burns referenced in Admission Number Fifty Six, you also indicated to Robert Edwin Burns that you had contacted numerous other auctioneers to encourage them to testify against HB 1439 and that you'd previously contacted Mr. Dave Gilmore and relayed to Robert Edwin Burns that he was "on board" regarding testifying against the bill.

RESPONSE TO REQUEST FOR ADMISSION NUMBER FIFTY NINE:

Defendant objects to Admission Number Fifty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY:

Please admit that, regarding the telephone call you mad to Robert Edwin Burns referenced in Admission Number Fifty Six, Robert Edwin Burns stated to you that he was very

displeased with the LALB's actions in recruiting auctioneers to testify against the bill and that, if Mr. Burns opted to get involved, it would be to testify in favor of the bill.

RESPONSE TO REQUEST FOR ADMISSION NUMBERS SIXTY:

Defendant objects to Admission Number Sixty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY ONE:

Please admit that Mr. Robert Edwin Burns did in fact testify in favor of HB 1439 at a Legislative Committee Hearing on May 18, 2010.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY ONE:

Defendant objects to Admission Number Sixty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY TWO:

Please admit that you were in attendance at the May 17, 2010 LALB meeting, the day prior to the Legislative Committee Hearing referenced in Admission Number Sixty One, when Ms. Anna Dow, legal counsel for the LALB, as reflected in the audio tape of that meeting, made the following verbatim quote regarding Rep. Baldone, the author of HB 1439: "He doesn't like auctioneers and he thinks you're all crooks."

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY TWO:

Defendant objects to Admission Number Sixty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY THREE:

Please admit that, at the May 17, 2010 LALB meeting, as reflected in the audio tape of that meeting, then-Chairman Ken Comer sharply criticized Rep. Baldone for his authorship of HB 1439, that Marvin Henderson and Larry Nobles both relayed Rep. Baldone "has a vendetta against all auctioneers," and that Consumer Member Greg Bordelon stated that, "conducting a vendetta through the Legislature is illegal."

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY THREE:

Defendant objects to Admission Number Sixty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY FOUR:

Please admit that you authored a letter to the Louisiana Board of Ethics dated June 2, 2010, fifty-three (53) days after your telephone call to Robert Edwin Burns recruiting him to testify against HB 1439 and fifteen (15) days after the LALB meeting of May 17, 2010, inquiring of the of the Ethics Board as to whether Robert Edwin Burns may have violated LSA-R.S. 24:56(F) pertaining to his testimony for the Legislative Committee Hearing on May 18, 2010.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY FOUR:

Defendant objects to Admission Number Sixty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY FIVE:

Please admit that, at the July 18, 2011 meeting of the LALB, as reflected in the audio tape of that meeting, you made the following verbatim quote: “Now that I’ve got Mr. Phillips, Mr. Burns, and his video camera and because of them attending the Interior Design Board Meetings, I now have [EBRP] Deputy Landry there also.”

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY FIVE:

Defendant objects to Admission Number Sixty Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY SIX:

Please admit that, upon your assuming your employ with the LALB, you requested at the first Board Meeting of August 17, 2009, that each LALB member pre-sign approximately six (6) blank travel voucher reimbursement forms.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY SIX:

Defendant objects to Admission Number Sixty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY SEVEN:

Please admit that your practice was to complete the pre-signed travel vouchers referenced in Admission Number Sixty Six for LALB members and, in so doing, provided the convenience that LALB members did not have to prepare nor review the travel vouchers they submitted for travel reimbursement.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY SEVEN:

Defendant objects to Admission Number Sixty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY EIGHT:

Please admit that your current practice in the employ of the LALB continues to entail requesting that Board Members pre-sign travel vouchers and then you complete them on an ongoing basis for the LALB members.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY EIGHT:

Defendant objects to Admission Number Sixty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SIXTY NINE:

Please admit that your current practice regarding LALB checks prepared for payment is to sign the checks and rubber stamp the chairman's name as the second required signatory on the checks.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SIXTY NINE:

Defendant objects to Admission Number Sixty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY:

Please admit that you have engaged in the practice of rubber stamping the LALB Chairman's name on travel vouchers and that the practice continues to this day.

RESPONSE TO REQUEST FOR ADMISSION NUMBERS SEVENTY:

Defendant objects to Admission Number Seventy on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY ONE:

Please admit that you cannot account for the whereabouts of the LALB tape of the August 17, 2009 LALB meeting entailing the discussion of the parameters of your employment conditions with the LALB.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY ONE:

Defendant objects to Admission Number Seventy One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY TWO:

Please admit that no posted office hours for the performance of your duties nor office hours during which either the LALB or the Interior Design Board are open to the public are applicable under the terms of your existing employment arrangements with either agency.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY TWO:

Defendant objects to Admission Number Seventy Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVEN THREE:

Please admit that, at the January 10, 2011 LALB meeting, as reflected in the audio tape of the meeting and the subsequent agreement executed between you and the LALB, an "employment agreement" was presented to the LALB wherein the terms of your employment were stated to be "performance based" and not a function of hours worked.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY THREE:

Defendant objects to Admission Number Seventy Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENT FOUR:

Please admit that, for all time periods to the January 10, 2011 LALB meeting as well as pay periods after the January 10, 2011 LALB meeting, your practice has been to complete a spreadsheet attesting to the fact that you have worked approximately 15 hours per week for the LALB and that you accrue annual and sick leave based on working 15 hour per week.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY FOUR:

Defendant objects to Admission Number Seventy Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY FIVE:

Please admit that, at the same January 10, 2011 LALB meeting, as reflected on the audio tape of the meeting Board Attorney/ Anna Dow stated that the Interior Design Board would also have to approve a similar employment agreement concerning your work arrangement with the Board.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY FIVE:

Defendant objects to Admission Number Seventy Five on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, nor is it reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY SIX:

Please admit that, on the date of this submission, the approval referenced in Admission Number Seventy Five regarding the Interior Design Board has not transpired.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY SIX:

Defendant objects to Admission Number Seventy Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER SEVENTY SEVEN:

Please admit that, as of April 8, 2011, the building located at 5222 Summa Court was privately owned by an entity controlled by Mr. Steven Winkler, who served as the landlord for the LALB, the Interior Design Board, and other tenants, including the Arthritis Association of Louisiana.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY SEVEN:

Admit.

REQUEST FOR ADMISSION NUMBER SEVENTY EIGHT:

Please admit that, as per the provisions of leases executed by lessees at the building located at 5222 Summa Court, tenants, including the Arthritis Association of Louisiana, had privileges for using the Boardroom of the building during the time the LALB was a tenant of the building.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY EIGHT:

Admit.

REQUEST FOR ADMISSION NUMBER SEVENTY NINE:

Please admit that you have arrived at the building on 5222 Summa Court to perform official duties of the LALB and/or the Interior Design Board with one or more of your children accompanying you during the time of your office visits and that they remained with you during the entirety of your time at the building at 5222 Summa Court when those children did accompany you.

RESPONSE TO REQUEST FOR ADMISSION NUMBER SEVENTY NINE:

Defendant objects to Admission Number Seventy Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY:

Please admit that your children are or have often been at your home at the time you are performing office duties of the LALB and/or Interior Design Board.

RESPONSE TO REQUEST FOR ADMISSION NUMBERS EIGHTY:

Defendant objects to Admission Number Eighty on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY ONE:

Please admit that no formal discussion at any public meeting of the LALB transpired regarding you being granted permission to have your children accompany you at the LALB's office when performing your work duties.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY ONE:

Defendant objects to Admission Number Eighty One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY TWO:

Please admit that, at the March 21, 2011 LALB meeting, as reflected on the audio tape of that meeting, you indicated that Ms. Liz Joiner of the Louisiana Department of State Civil Service indicated to you that, as an unclassified employee and Executive Assistant of a State Board, you were exempt from Governor Bobby Jindal's pay freeze order that would have otherwise precluded the \$2,000/year raise the LALB voted to award you at the January 10, 2011 LALB meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY TWO:

Defendant objects to Admission Number Eighty Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY THREE:

Please admit that, also at the March 21, 2011 LALB meeting, as reflected on the audio tape of the meeting, you indicated that Ms. Liz Joiner of the Louisiana Department of State Civil Service indicated to you that, since you are not a direct employee of the Division of Administration, that Division's telecommuting policy, which expressly prohibits employees from caring for children or elderly adults during any of the time during which they work from home

and which prohibits the running of personal errands during times designated as work hours in a telecommuting work arrangement, does not apply to you.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY THREE:

Defendant objects to Admission Number Eighty Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY FOUR:

Please admit that you work for both the LALB and the Interior Design Board and have stated that, provided your cell phone is with you at any time, you are deemed “on the clock” irrespective of where you may be physically be located or what activity you may be engaged in, including vacationing in Disney world or other Florida destinations.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY FOUR:

Defendant objects to Admission Number Eighty Four on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY FIVE:

Please admit that, on page eight (8) of the narrative section of the EBRP Sheriff’s Office police report approved by Ernest Soileau on April 17, 2011 (Exhibit P-5 of the petition), it states that such dispatch was made to the Louisiana Auctioneer’s Licensing Board.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY FIVE:

Admit.

REQUEST FOR ADMISSION NUMBER EIGHTY SIX:

Please admit that, at the LALB meeting of September 20, 2010, audience members were all informed that they would be required to stand in the hallway and not be provided access to the LALB meeting room.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY SIX:

Defendant objects to Admission Number Eighty Six on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY SEVEN:

Please admit that, at the September 20, 2010 LALB meeting, Robert Edwin Burns videotaped, standing from the hallway, the segment of that meeting entailing the license reinstatement of auctioneer Ken Buhler.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY SEVEN:

Defendant objects to Admission Number Eighty Seven on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY EIGHT:

Please admit that, Advocate reporter Ted Griggs openly demanded of LALB attorney Anna Dow that he be provided with the exact statute by which she said he could not be permitted in the LALB meeting room and would be required to stand in the hallway.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY EIGHT:

Defendant objects to Admission Number Eighty Eight on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER EIGHTY NINE:

Please admit that, as reflected on the audio tape of that September 20, 2010 meeting, then-Chairman Ken Comer twice told Robert Edwin Burns that he would not be recognized to speak prior to the vote being taken on two separate LALB agenda items for that meeting.

RESPONSE TO REQUEST FOR ADMISSION NUMBER EIGHTY NINE:

Defendant objects to Admission Number Eighty Nine on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETY

Please admit that, subsequent to that September 20, 2010 LALB meeting, Robert Edwin Burns filed an Open Meeting violation lawsuit against the LALB due to public inability to have access to the meeting's deliberations as well as then-Chairman Ken Comer having denied public member Robert Burns' right to address the Board prior to votes taken on agenda items.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETY:

Defendant objects to Admission Number Ninety on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETY ONE:

Please admit that, at the March 21, 2011 LALB meeting, as reflected on the audio tape of that meeting and in the minutes of that meeting, the LALB voted unanimously to settle the lawsuit filed by Robert Edwin Burns referenced in Admission Number Ninety.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETY ONE:

Defendant objects to Admission Number Ninety One on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETY TWO:

Please admit that, at the July 18, 2011 LALB meeting, as reflected on the audio tape of that meeting, Ms. Anna Dow, legal counsel for the LALB, indicated that she intended to provide the LALB with names of attorneys supplied by the Louisiana Attorney General's Office in order that the Board may pursue potential disciplinary action against the license of Robert Edwin Burns, stating as the rationale for such potential disciplinary action his litigation referenced in Admission Number Ninety and Ninety One.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETY TWO:

Defendant objects to Admission Number Ninety Two on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETY THREE:

Please admit that, at the July 18, 2011 LALB meeting as reflected on the audio tape of that meeting, Ms. Anna Dow, legal counsel for the LALB, indicated that she intended to provide the LALB with names of attorneys supplied by the Louisiana Attorney General's Office in order that the Board may pursue potential disciplinary action against the license of Freddie Phillips as

a result of his filing of a Writ of mandamus in an effort to obtain LALB travel records as referenced in Admission Number Thirty.

RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETY THREE:

Defendant objects to Admission Number Ninety Three on the grounds that the information/documentation sought in said Admission is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence.

REQUEST FOR ADMISSION NUMBER NINETY FOUR:

Please admit that, despite the serious nature of you initiating a police report as the only complainant regarding the filming of video clips during the week of Monday, April 4, 2011 through Friday, April 8, 2011 by Robert Edwin Burns, you nevertheless did not believe the situation to be serious enough to warrant being placed on the LALB agenda for discussion at its June 20, 2011 meeting.

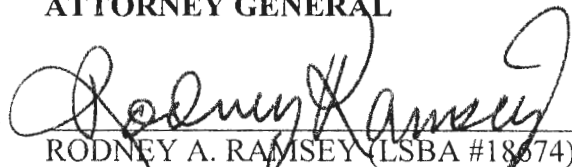
RESPONSE TO REQUEST FOR ADMISSION NUMBER NINETY FOUR:

Denied. Sandy Edmonds does not have control over what goes on the LALB agenda.

Respectfully submitted:

**JAMES D. "BUDDY" CALDWELL
ATTORNEY GENERAL**

BY:



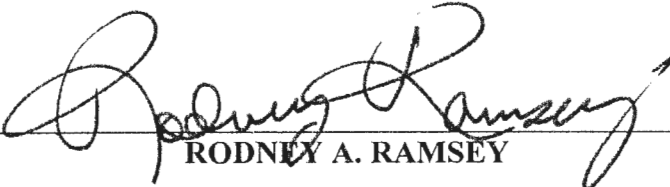
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a copy of the above and foregoing Defendant's Responses to Plaintiff's Request for Admissions of Fact has been served upon pro se plaintiff, Robert Burns, by depositing same in the U. S. Mail, postage prepaid, at the following address:

Robert Edwin Burns, In Proper Person
President, Auction Sells Fast, LLC
4155 Essen Lane, Suite 228
Baton Rouge, Louisiana 70809-2152

this 11th day of January, 2012.



RODNEY A. RAMSEY