

ROBERT BURNS, REV. FREDDIE
LEE PHILLIPS

NUMBER 619707 DOCKET: 27
19TH JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

LOUISIANA AUCTIONEER'S LICENSING BAORD,
TESSA STEINKAMP, JAMES M SIMS, GREGORY
L. "GREG" BORDELON

STATE OF LOUISIANA

**PLAINTIFF'S RESPONSES TO DEFENDANTS' INTERROGATORIES AND
REQUEST FOR PRODUCTION OF DOCUMENTS**

INTERROGATORIES

INTERROGATORY NUMBER ONE:

Please identify each and every person, as well as their address and telephone number,
who answered, participated in answering, assisted in answering, or was consulted before
answering these Interrogatories.

RESPONSE TO INTERROGATORY NUMBER ONE:

Plaintiff answered all interrogatories on his own. Plaintiff's address is 4155 Essen Lane, Apt.
228, Baton Rouge, LA 70809-2152, and his telephone number is 225-636-5506 (home) and
225-235-4346 (cell).

INTERROGATORY NUMBER TWO:

Please describe in detail the alleged damage you have suffered as a result of the Defendants'
alleged violation of the Open Meeting Laws.

RESPONSE TO INTERROGATORY NUMBER TWO:

My First Amendment right to free speech was blatantly violated in that I was unable to
confront and expose the issue of Defendant LALB Members' receipts of illegal Per Diem
payments for the Board Meeting of September 17, 2012 notwithstanding that "approval of
financials" was a line item on the agenda and Per Diem payments was a line item on those
financials. Furthermore, I'd been provided prior written assurance from Defendant LALB's
legal counsel, Larry S. Bankston, that I would be permitted to address the issue at the Board
Meeting of January 8, 2013. As a result of this suppression of my First Amendment right, I
had to expend additional time and energy in dialogue and correspondence with Ms. Kindal
Miley who did ultimately notify the Board Members that the Per Diem payments had to be
refunded, which they ultimately were.

INTERROGATORY NUMBER THREE:

Please identify, including name, address, telephone number, and employer, if known each

and every individual that you are aware of who has knowledge of any information that is relevant to allegations contained in your Petition for Damages.

RESPONSE TO INTERROGATORY NUMBER THREE:

1. Plaintiff, Robert Edwin Burns, 4155 Essen Lane, Apt. 228, Baton Rouge, LA 70809-2152. 225-235-4346. Retired.
2. Co-Plaintiff, Rev. Freddie Lee Phillips, 8055 Hanks Drive, Baton Rouge, LA 70812-4122, 225-229-3341. EBRP School Board, 225-922-5400.
3. Helen Yvonne Burns (Plaintiff's mother), 4155 Essen Lane, Apt. 228, Baton Rouge, LA 70809-2152. 225-235-4346. Retired.
4. Ms. Sherrie Wilks, audience member. 14223 Harry Savoy Road, St. Amant, LA 70774.

INTERROGATORY NUMBER FOUR:

Please identify all documents and tangible things known to Robert Burns that relate in any way to the allegations contained in the Petition for Damages, and state, for each document or tangible thing, whether you intend, may, and/or reasonably expect to use it at trial. (Note, your response to this interrogatory should delineate and specify which document(s) and tangible thing(s) apply to which allegations(s).)

RESPONSE TO INTERROGATORY NUMBER FOUR:

Plaintiff is unaware of any such documents which have not already been filed and recorded as exhibits to either the Petition or Opposition Memorandums to Defendants' Dilatory Exceptions. Plaintiff reserves the right to supplement this response at a later date.

INTERROGATORY NUMBER FIVE:

Please identify each and every person that you may, or will call to testify at the trial of this matter, including expert, rebuttal, and impeachment witnesses, and for each provide a brief summary of their expected testimony.

RESPONSE TO INTERROGATORY NUMBER FIVE:

Plaintiff expects to prevail on Motion for Summary Judgment scheduled for August 4, 2014 and therefore anticipates no need to call witnesses at any trial; however, should a trial ultimately become necessary, Plaintiff would expect to call himself, Co-Plaintiff Rev. Phillips, and Ms. Sherrie Wilks. Plaintiff reserves the right to supplement this response at a later date.

INTERROGATORY NUMBER SIX:

Please describe in detail each and every fact that supports or relates in any way to your allegations that "Defendants Bordelon, Sims, and Steinkamp did knowingly and willfully violate LA R. S. 42:14(D)."

RESPONSE TO INTERROGATORY NUMBER SIX:

These facts are fully espoused upon in the Petition of which each Defendant was served with a copy.

INTERROGATORY NUMBER SEVEN:

Please identify, by suit name, docket number, and court, each and every lawsuit that you have been a party to over the past 10 years.

RESPONSE TO INTERROGATORY NUMBER SEVEN:

Plaintiff objects to Interrogatory Number Seven on the grounds that the information sought is equally available to the propounding party as any such suit was filed in Louisiana's 19th JDC. 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. The preceding response notwithstanding, Plaintiff has already provided the requested information as part of the discovery process entailing the matter of Robert Burns v. LALB, Docket # 616916 tried before Judge Fields on April 19, 2014 and for which a Motion for Devolutive Appeal has been filed.

INTERROGATORY NUMBER EIGHT:

Please state whether or not you have a social media profile or blog, for example, Facebook, My Space, Twitter, Instagram, Youtube, Wilds, Linkedin, Blackpanet, Mylife, Foursquare, etc., and if so, whether it contains a privacy setting. (In answering this interrogatory, please list the each and every social media source and/or blog website address you use.)

RESPONSE TO INTERROGATORY NUMBER EIGHT:

Facebook. No privacy setting whatsoever. Website URL:

<https://www.facebook.com/robert.burns.104418>.

INTERROGATORY NUMBER NINE:

Please state whether or not you are an administrator for a social media profile or blog, for example, Facebook, My Space, Twitter, Instagram, Youtube, Wilds, Linkedin, Blackpanet, Mylife, Foursquare, etc., for any entity or group, and if so, whether it contains a privacy setting. (In answering this interrogatory, please list the name of each and every social media

source and/or blog website address you administer and the name of such entity/group the profile is associated with.)

RESPONSE TO INTERROGATORY NUMBER NINE:

No.

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

REQUEST FOR PRODUCTION NUMBER ONE:

Please produce any and all documents identified, reviewed, relied upon, referred to, or described by you to answer the first set of Interrogatories served contemporaneously with these Requests for Production.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER ONE:

All documents referenced are already in the possession of Defendants either in the form of pleadings, Exhibits to pleadings, or discovery responses pertaining to Burns v. LALB et. al., Docket # 616916, for which Defense Counsel also served in that same capacity.

REQUEST FOR PRODUCTION NUMBER TWO:

Please produce a copy of any and all exhibits that you may/or will introduce into evidence of use for demonstrative purposes at the trial of the matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER TWO:

Plaintiff is unaware of any exhibits to be introduced which have not already been supplied to Defendants. Plaintiff reserves the right to supplement this response at a later date.

REQUEST FOR PRODUCTION NUMBER THREE:

Please produce any and all documents that were identified, reviewed, relied upon, referred to, or described by you to prepare the Petition in this matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER THREE:

All such documents were provided as exhibits to the Petition. Plaintiff reserves the right to supplement this response at a later date.

REQUEST FOR PRODUCTION NUMBER FOUR:

Please produce copies of any and all communications, both written and oral for the past three years, between you and any of the Defendants in the above captioned matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER FOUR:

Plaintiff objects to Request for Production Number Four on the grounds that the information/documentation sought in said Production Request is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible

evidence. Plaintiff further objects based on the grounds that the request fails miserably to conform to LA CCP 1420(B)(3) in being “unreasonable, unduly burdensome, or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.” The preceding response notwithstanding, Plaintiff has already provided fourteen (14) emails between the dates of April 1, 2012 and June 20, 2013 as part of discovery in the matter of Burns v. LALB et. al. Docket # 616916 tried in Judge Fields’ courtroom on April 9, 2014 and for which a Motion for Devolutive Appeal has been filed. Plaintiff is unaware of any emails sent to Defendants after June 20, 2013.

REQUEST FOR PRODUCTION NUMBER FIVE:

Please produce copies of any and all communications, both written and oral for the past three years, between you and any current or past employee of the Louisiana Auctioneers Licensing Board.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER FIVE:

Plaintiff objects to Request for Production Number Five on the grounds that the information/documentation sought in said Production Request is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects based on the grounds that the request fails miserably to conform to LA CCP 1420(B)(3) in being “unreasonable, unduly burdensome, or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.” The preceding response notwithstanding, Plaintiff provided a generalized content of his telephone conversations with former LALB Executive Director Sherrie Wilks between the dates of April 1, 2012 and June 13, 2013 as part of the discovery process in Robert Burns v. LALB, Docket # 696916, which was tried before Judge Fields and for which a Motion for Devolutive Appeal has been filed. Any subsequent phone conversations since June 13, 2013 have been few and far between and have tended to have little or no reference to LALB-related matters.

REQUEST FOR PRODUCTION NUMBER SIX:

Please produce any and all statements, whether written or oral, taken in this case.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER SIX:

None.

REQUEST FOR PRODUCTION NUMBER SEVEN:

Please produce a copy of any video, audio, or electronic recording that was identified, reviewed, relied upon, referred to, or described by you to prepare the Petition in this matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER SEVEN:

The only video relied upon in the Petition is the video of the meeting itself. A DVD copy has been supplied with this response.

REQUEST FOR PRODUCTION NUMBER EIGHT:

Please produce all documents and electronically stored information reflecting, evidencing, or relating to any of the Defendants in the above captioned matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER EIGHT:

Plaintiff objects to Request for Production Number Eight on the grounds that the information/documentation sought in said Production Request is not relevant to any issue raised in the lawsuit, and it is not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects on the grounds that the request fails miserably to conform to LA CCP 1420(B)(3) in being “unreasonable, unduly burdensome, or expensive, given the needs of the case, the discovery already had in the case, the amount in controversy, and the importance of the issues at stake in the litigation.”

REQUEST FOR PRODUCTION NUMBER NINE:

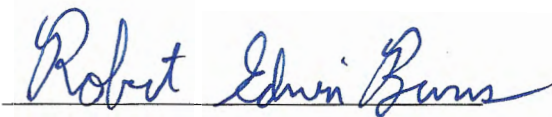
Please produce copies of any and all communications, both written and oral for the past three years, between you and Freddie Phillips, which are in any way related to the above captioned matter.

RESPONSE TO REQUEST FOR PRODUCTION NUMBER NINE:

Plaintiff is unaware of the existence of any such written communication, nor is there any recorded conversation between Plaintiff and Rev. Freddie Phillips which Plaintiff could provide in response to this request.

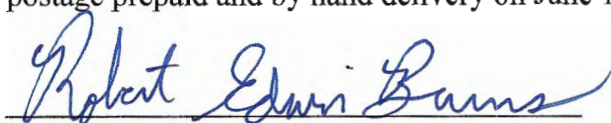
Respectfully Submitted,

Robert Edwin Burns, in proper person
4155 Essen Lane, Apt 228
Baton Rouge, LA 70809-2152
(225) 636-5506 (home)
(225) 235-4346 (cell)
E-mail: Robert@AuctionSellsFast.com

A handwritten signature in blue ink that reads "Robert Edwin Burns". The signature is written in a cursive style and is positioned above a horizontal line.

Certificate of Service:

I hereby certify, on this 12th day of June, 2014, that a copy of the foregoing has been served upon counsel for all parties to this proceeding by submitting a copy of same via electronic mail, facsimile, or First Class United States Mail, properly addressed and postage prepaid and by hand delivery on June 12, 2014.

A handwritten signature in blue ink that reads "Robert Edwin Burns". The signature is written in a cursive style and is positioned above a horizontal line.