

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

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CHRISTOPHER A. ROLLER,

Plaintiff,

v.

Case No. 05-CV-1297 MD/AJB

GE MEDICAL SYSTEMS INFORMATION  
TECHNOLOGIES, INC.,

Defendant.

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**CHRISTOPHER ROLLER INTERROGATORIES AND DOCUMENT REQUESTS TO  
DEFENDENT GE MEDICAL SYSTEMS INFORMATION TECHNOLOGIES, INC.'S**

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TO: JUDITH A. WILLIAMS-KILLACKEY  
QUARLES & BRADY LLP  
411 East Wisconsin Avenue  
Suite 2040  
Milwaukee WI 53202-4497

**FIRST SET OF INTERROGATORIES**

Pursuant to Federal Rule of Civil Procedure 33, Plaintiff, Christopher Roller, serves the following interrogatories and requests that Plaintiff serve a response sworn under oath within thirty days.

**INTERROGATORY INSTRUCTIONS**

1. If you are unwilling to provide the requested information, totally or in part, with respect to any interrogatory, for example, but without limitation, because you claim it to be privileged, identify the privilege claimed and briefly state the grounds upon which the claim of privilege rests and nonetheless delineate the information that is being withheld so that defendant may meaningfully decide whether to move to compel production of that information.

2. With respect to each and every interrogatory, as well as each and every sub-interrogatory:

- (i) Identify all persons having knowledge concerning this subject, including without limitation, all expert witnesses, and specify the general nature of each such person's knowledge.
- (ii) Identify all documents that relate in any way to the subject.
- (iii) Identify all oral matters that relate in any way to the subject.
- (iv) Identify all persons drafting the answer to the interrogatory or any portion thereof, state by what authority they are answering the interrogatory on your behalf, describe in detail the nature and extent of the investigation engaged in that led to the answer, identify all persons contacted and all documents or files reviewed during the course of the investigation, and identify all persons from whom any of the information presented in the answer was obtained.

3. In answering these interrogatories, you are required to furnish all information that is available to you or subject to your reasonable inquiry including, but not limited to, information in the possession of your attorneys, accountants, advisors or other persons directly or indirectly employed by, or connected with, you and anyone else otherwise subject to your control.

4. In answering these interrogatories you must make a diligent search of your records and of papers and materials in your possession or available to you or your attorneys and representatives.

5. If an interrogatory has subparts, answer each part separately and in full, and do not limit your answer to the interrogatory as a whole. If any interrogatory cannot be answered in full, answer to the extent possible, specify the reason for your inability to answer the remainder, and state whatever information and knowledge you have regarding the unanswered portion.

6. The interrogatories are continuing and the answers thereto must be supplemented to the maximum extent authorized by law and the applicable rules.

## INTERROGATORY DEFINITIONS

1. Communication. The term “communication,” means the transmittal of information (in the form of facts, ideas, inquiries, or otherwise).
  
2. Document. The term “document” is defined to be synonymous in meaning and equal in scope with the usage of this term in Fed. R. Civ. P. 34(a) and refers to the original and all non-identical copies or reproductions of any written, printed, typed, or recorded matter of any kind known to you or in your possession, custody, or control, including but not limited to:
  - (i) All letters, correspondence, memoranda, telegrams, writings, instructions, calendars, desk books, records, reports, charts, studies, surveys, speeches, pamphlets, notes, drafts, proposals, minutes of meetings, microfiche, microfilm, drawings, audiotapes, audio-visual tapes, books, papers, computations, tabulations, accounting records, inter-office and intra-office communications, electronic mail communications, schedules, lists, specifications, ledgers, journals, diaries, checks, records, recordings or memoranda of conversations or any other written, printed, typewritten or other graphic or photographic matter or tangible thing on which any words or phrases are affixed, all mechanical, electronic sound or video records or transcripts thereof, all magnetic records or matter existing in any other machine-readable form, however produced or reproduced, tape or other voice records of conferences, telephone conversations, or other communications and drafts of any of the foregoing;
  - (ii) Computer software, files, disks, diskettes, and tapes, and any hard copies of the information stored thereon.

It also shall include copies of such documents upon which appear any initialing, notation or handwriting of any kind not appearing on the original, whether such documents were prepared by agents or representatives of the plaintiff for their own use or for transmittal in any manner, or were received by them.

The term applies to documents wherever located, whether in the files of any agent or representative of the plaintiff or in any file whatsoever in the possession or direction or control of the plaintiff, her agents, representatives or any other person retained by the complainants.

3. Identify.

(i) With respect to persons. When referring to a person, “to identify” means to give, to the extent known, the person’s full name, present or last known address, and when referring to a natural person, additionally, the present or last known place of employment. Once a person has been identified in accordance with this subparagraph, only the name of that person need be listed in response to subsequent discovery requesting the identification of that person.

(ii) With respect to documents. When referring to documents, “to identify” means to give, to the extent known, the:

- a. type of document;
- b. general subject matter;
- c. date of the document; and
- d. author(s), addressee(s) and recipient(s).

4. Person. The term “person” is defined as any natural person or any business, legal or governmental entity, or association.

5. “My” or “mine” or “I” means Christopher Roller. “Your” means GEMS IT via JUDITH A. WILLIAMS-KILLACKEY.

6. “The Company” and/or GEMS IT means GE Medical Systems Information Technologies, Inc. and any related or affiliated companies, including but not limited to Micro Medical Systems.

### **INTERROGATORIES**

**INTERROGATORY NO. 1:** Identify all persons presently known with knowledge of any facts alleged in my complaint or with knowledge of facts that may otherwise support your answer and/or any defenses thereto, and for each such person, summarize the facts the person knows.

**INTERROGATORY NO. 2:** For each person you intend to use as a fact or expert witness in this litigation, please provide:

- (1) The person’s name;

- (2) The person's address and telephone number;
- (3) A summary of the subject matter of the person's relevant knowledge and/or testimony, the substance of the facts and opinions to which each expert is expected to testify, and a summary of the grounds for each opinion expressed by each expert.

INTERROGATORY NO. 3: Identify each and every person who is not a party to this action to whom you or your representatives has spoken, or attempted to speak with, regarding any of the allegations stated in the Complaint or its answer.

### **FIRST SET OF DOCUMENT REQUESTS**

Pursuant to Federal Rule of Civil Procedure 34, Christopher Roller requests that you produce at the residence of: 13150 Harriet Ave S #273, Burnsville, MN 55337, copies of all documents requested within thirty (30) days of service of this request.

### **REQUEST FOR PRODUCTION OF DOCUMENTS INSTRUCTIONS**

1. If you are unwilling to provide any document, totally or in part, because it is claimed to be privileged, identify the privilege claimed and briefly state the grounds upon which the claim of privilege rests and identify the document that is being withheld so that defendant may meaningfully decide whether to move to compel production of that document.

2. In responding to this document production request, you must make a diligent search of your records and of papers and materials in your possession or available to you or your attorneys.

### **DOCUMENT REQUEST DEFINITIONS**

Christopher Roller hereby incorporates the above interrogatory definitions.

### **DOCUMENT REQUESTS**

REQUEST NO. 1: Produce all documents relied on in answering the above Interrogatories or which relate to or substantiate your answers to those Interrogatories.

REQUEST NO. 2: Produce all notes, diaries, calendars or other documents regarding, related to or referencing my employment with the Company and/or the allegations in the complaint or answer.

REQUEST NO. 3: Produce all documents that you propose to use during the preparation for or litigation of this matter and all documents that you believe support your claims.

REQUEST NO. 4: Produce any document that you believe supports any aspect of the complaint or answer.

REQUEST NO. 5: Produce all correspondence to or from any expert retained for this case.

REQUEST NO. 6: Produce all expert reports.

REQUEST NO. 7: Produce all documents, including correspondence, expert reports and drafts of reports, which were prepared by each person whom you expect to call as an expert witness at trial and the data upon which said expert witness bases the opinions and conclusions contained therein.

REQUEST NO. 8: Produce any audio or visual recording related to the allegations in the complaint or answer.

REQUEST NO. 9: Produce all statements which were made by, or notes of or correspondence relating to discussions you have had with, any persons with knowledge of any facts alleged in your answer or facts that you believe support your claims.

REQUEST NO. 10: Produce all documents including, but not limited to, calendars, diaries, notes, memoranda, or correspondence that reference, summarize, describe, constitute or restate any conversations, interviews, or meetings you or your representatives have had with any individual (other than your attorney) concerning any fact or theory alleged in your answer.

REQUEST NO. 11: Produce all documents regarding, referring or relating to my performance at the Company, including but not limited to performance evaluations, complaints from customers, notes of discussions with supervisors, self-assessments, commendations, awards, and disciplinary actions.

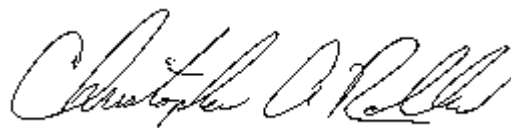
REQUEST NO. 12: Produce all documents regarding, referring to, relating to, or supporting your claim that the Company, or its employees terminated me because of poor performance.

REQUEST NO. 13: Produce all documents regarding, referring to, relating to, or supporting your claim that I am not disabled under the South Dakota Human Rights Act.

REQUEST NO. 14: Produce all documents regarding, referring to, relating to, or supporting my claim that the Company or its employees knew of my disability.

REQUEST NO. 15: Produce all documents regarding, referring to, relating to, or supporting a claim that the reasons given by the Company, or its employees for my termination were not pretextual.

Dated: April 6, 2006



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