

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

DAVID SCHIED, Individually,

Plaintiff,

V.

Case No. 2:15-cv-11840

Hon. Avern Cohn

Magistrate Stephanie Dawkins Davis

KAREN KHALIL, in her individual capacity,  
CATHLEEN DUNN, in her individual capacity,  
JOSEPH BOMMARITO, in his individual capacity,  
JAMES TURNER, in his individual capacity  
DAVID HOLT, in his individual capacity  
JONATHAN STRONG, in his individual capacity  
"POLICE OFFICER" BUTLER, in his individual capacity,  
JOHN SCHIPANI, in his individual capacity  
REDFORD TOWNSHIP POLICE, DEPARTMENT,  
REDFORD TOWNSHIP 17<sup>TH</sup> DISTRICT COURT,  
TRACEY SCHULTZ-KOBYLARZ, in her individual capacity,  
CHARTER TOWNSHIP OF REDFORD,  
CHARTER COUNTY OF WAYNE,  
MICHIGAN MUNICIPAL RISK  
MANAGEMENT AUTHORITY ("MMRMA"),  
THE INSURANCE COMPANY OF THE  
STATE OF PENNSYLVANIA, ("ICSOP"),  
AMERICAN INTERNATIONAL GROUP, INC. ("AIG"), and  
DOES 1-10

Defendants.

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**DEFENDANT, THE INSURANCE COMPANY OF THE STATE OF PENNSYLVANIA'S  
OBJECTIONS AND RESPONSES TO PLAINTIFF DAVID SCHIED'S  
FIRST INTERROGATORIES AND REQUESTS FOR EXHIBITS**

The Insurance Company of the State of Pennsylvania ("ICSOP"), by and through its counsel, Plunkett Cooney, pursuant to Fed. R. Civ. P. 33 and 34, states its Objections and Responses to Plaintiff David Schied's First Interrogatories and Requests for Exhibits as follows:

## PRELIMINARY STATEMENT

The objections and statements set forth in this Section and the following Section entitled "Objections to Discovery Requests" apply to each of Plaintiff's David Schied's First Interrogatories and Requests for Exhibits and are not necessarily repeated in response to each individual request. The assertion of the same, similar or additional objections in ICSOP's specific objections to individual interrogatories and/or requests for production or the failure to assert any additional objection does not waive any of ICSOP's objections in this section or the following section.

## OBJECTIONS TO DISCOVERY REQUESTS

1. ICSOP objects to these Discovery Requests, pursuant to Fed. R. Civ. P. 33(a)(1) which limits the number of written interrogatories a party may serve on another party to 25, including all discrete subparts, unless otherwise stipulated or ordered by the Court. ICSOP has not stipulated nor agreed to respond to interrogatories in excess of the 25 allowed by the Federal Rules, nor has Plaintiff David Schied sought leave of Court to serve additional interrogatories.

## ICSOP'S DEFINITIONS

As used in ICSOP's Objections and Responses to Plaintiff David Schied's First Interrogatories and Requests for Exhibits ("Discovery Requests" or "Requests"), the following definitions shall apply:

1. **"AIG"** means American International Group, Inc.
2. **"Defendants"** means The Insurance Company of the State of Pennsylvania and American International Group, Inc., collectively.
3. **"ICSOP"** means The Insurance Company of the State of Pennsylvania.

4. **“ICSOP Policy”** means Special Excess Liability Policy for Public Entities No. 1130137 issued by The Insurance Company of the State of Pennsylvania to Named Insured Wayne County for the policy period May 15, 2012, to May 1, 2013.

5. **“Plaintiff”** means Plaintiff David Schied.

6. **“Wayne County”** means Charter County of Wayne.

#### **RESERVATION OF RIGHTS AND RIGHT TO AMEND**

The following Objections and Responses are based upon information and documents presently known to ICSOP or believed to be applicable to ICSOP at the time of responding to these Requests. ICSOP reserves the right to further modify, amend and/or supplement the Objections and Responses set forth below if and when they learn of new information through discovery or otherwise. ICSOP will supplement these Responses to the extent required under the Federal Rules of Civil Procedure and will produce additional responsive information, documents and/or material if and when such information becomes available.

#### **OBJECTIONS AND RESPONSES TO INTERROGATORIES FOR ALL TO ANSWER**

1. Do you have county and/or township officers, employees, assigned guardians, clerks, treasurers, constables, purchasing agents, commissioners, county auditors, deputies, register of deeds, directors, legal counsel, secretaries, board members, chief executive officers, board members, school board members, magistrates, bailiffs, police officers, court reporters, attorneys, prosecuting attorneys, or other personnel who are required by the state constitution, state laws, and/or county ordinances to maintain Oaths and Bonds in guarantee and surety on their “honesty,” their “faithful discharge” and/or performance of their respective duties of office and/or employment?

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objection, ICSOP is not a county or township and ICSOP and its employees are not "required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds in guarantee and surety on their 'honesty,' their 'faithful discharge' and/or performance of their respective duties of office and/or employment."**

2. If answering "yes" to #1 above, name each person required to have such oaths and bonds and given the location where each can be found and provide proof by copies of only their bonds.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer "Yes" to Interrogatory No. 1. However, notwithstanding this interrogatory's inapplicability, ICSOP objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objection, ICSOP is not a county or township and ICSOP and its employees are not "required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds in guarantee and surety on their 'honesty,' their 'faithful discharge' and/or performance of their respective duties of office and/or employment."**



3. If answering “no” to #1 above, name each person so employed in any of the above-listed positions being employed by the county and/or township without such a bond in guarantee of their oath and as surety against their “honesty,” their “faithful discharge” and/or performance of their respective duties of office and/or employment.

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objection, ICSOP is not a county or township and ICSOP is not employed by a county and/or township. ICSOP and its employees are not “required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds in guarantee and surety on their ‘honesty,’ their ‘faithful discharge’ and/or performance of their respective duties of office and/or employment.”**

4. If answering “no” to #1 above, give the reason for each person not complying with the state constitution, state statutes and/or county ordinances and provide proofs to support your answers.

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objection, ICSOP and its employees are not “required by the state constitution, state laws, and/or county ordinances to**

**maintain oaths and bonds in guarantee and surety on their 'honesty,' their 'faithful discharge' and/or performance of their respective duties of office and/or employment."**

5. In lieu of any individual bonds required by state laws to be provided by any or all of the above-named officers and employees of the county and/or township as depicted by #1 above, do you have any "blanket" bonds covering any portion of those named employment positions?

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township; ICSOP is not employed by a county and/or township and, therefore, ICSOP does not have any "blanket" bonds.**

6. If answering "yes" to #5 above, provide the name and holding location of each such "blanket" bond and for each bond, give the names of all such persons covered in surety on their honesty, faithful discharge of duties, and performance.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer "Yes" to Interrogatory No. 5. However, notwithstanding this interrogatory's inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township; ICSOP is not employed by a county and/or township and, therefore, ICSOP does not have any “blanket” bonds.**

7. If answering “yes” to #5 above, provide the name of the surety company providing issuance of such blanket bonds and the respective dates of such issuance.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 5. However, notwithstanding this interrogatory’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township; ICSOP is not employed by a county and/or township and, therefore, ICSOP does not have any “blanket” bonds.**

8. If answering “yes” to #5 above, provide copies of each such “blanket” bonds.

**RESPONSE:**

**This request for production is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 5. However, notwithstanding this request’s inapplicability. ICSOP objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this request for production is vague and/or overbroad. ICSOP further objects to this request for production to the extent that it: (a) seeks information or documents**

**beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township; ICSOP is not employed by a county and/or township and, therefore, ICSOP does not have any “blanket” bonds.**

9. Does your county or township have any “self-funded” and/or third party “excess” or other type of insurance policies that guarantee or provide surety to the taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable?

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is ambiguous and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county nor township having any “self-funded’ and/or third party ‘excess’ or other type of insurance policies that guarantee or provide surety to the taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable.”**

10. If answering “yes” to #5 [sic] above, provide the name and holding location of each such policy and for each policy, give the names of all such persons covered in surety on their honesty, faithful discharge of duties, and performance.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 9. However, notwithstanding this interrogatory’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county nor township having any “‘self-funded’ and/or third party ‘excess’ or other type of insurance policies that guarantee or provide surety to the taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable.”**

11. If answering “yes” to #5 [sic] above, provide the name of the surety company providing issuance of such policies and the respective dates of such issuance.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 9. However, notwithstanding this interrogatory’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county nor township having any “‘self-funded’ and/or third party ‘excess’ or other type of insurance policies that guarantee or provide surety to the taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable.”**

12. If answering “yes” to #5 [sic] above, provide copies of each such policies.

**RESPONSE:**

**This request for production is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 9. However, notwithstanding this request’s inapplicability, ICSOP objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this request for production is vague and/or overbroad. ICSOP further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county nor township having any “self-funded’ and/or third party ‘excess’ or other type of insurance policies that guarantee or provide surety to the taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable.”**

13. If answering “no” to the above, does your county or township have any “self-funded” and/or third party “excess” or other type of insurance policies that indemnify any of the categories of officers and employees cited in #1 above against claims or court findings and/or rulings determining “tort”, “errors and omissions”, or any other form of “liability” without providing any guarantees directly to the taxpayers for such types of breaches of “faithful” discharge and performance of duties in accordance with those officers’ and employees’ oath of office?

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county or township having any "self-funded" and/or third party "excess" or other type of insurance policies.**

14. If you answered "yes" to #13 above, please provide copies of all such "self-funded" or third-party insurance policies.

**RESPONSE:**

**This request for production is not applicable because ICSOP did not answer "Yes" to Interrogatory No. 13. However, notwithstanding this request's inapplicability, ICSOP objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this request for production is vague and/or overbroad. ICSOP further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, ICSOP is neither a county or township having any "self-funded" and/or third party "excess" or other type of insurance policies.**

15. For each of the years cited above (2011, 2012, 2013, 2014, 2015, 2016) has anyone placed or filed any claims – or attempted to place or file any claims – against any of the above categories of individual bonds, blanket bonds, or insurance policies based upon reports, notifications or other forms of communication indicating any level of violation or any officer or employee’s Oath, faithful discharge or performance of duties?

**RESPONSE:**

**ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county and/or township. ICSOP is not employed by a county or township. ICSOP and its employees are not required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds. ICSOP does not have any of the “above categories of individual bonds, blanket bonds, or insurance policies” listed in Plaintiff’s interrogatories and consequently, no one has “placed or filed any claims – or attempted to place or file any claims” against such individual bonds, blanket bonds, or insurance policies.**

16. If you answered “yes” to #15 above, provide names of all such individual [sic] placing or filing such claims.

**RESPONSE:**



**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 15. However, notwithstanding this interrogatory’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township. ICSOP is not employed by a county and/or township. ICSOP and its employees are not required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds. ICSOP does not have any of the “above categories of individual bonds, blanket bonds, or insurance policies” listed in Plaintiff’s interrogatories and consequently, no one has “placed or filed any claims – or attempted to place or file any claims” against such individual bonds, blanket bonds, or insurance policies.**

17. If you answered “yes” to #15 above, provide claim numbers for each of the claims successfully established and explain how each was resolved.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 15. However, notwithstanding this interrogatory’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or**

overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.

Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township. ICSOP is not employed by a county and/or township. ICSOP and its employees are not required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds. ICSOP does not have any of the “above categories of individual bonds, blanket bonds, or insurance policies” listed in Plaintiff’s interrogatories and consequently, no one has “placed or filed any claims – or attempted to place or file any claims” against such individual bonds, blanket bonds, or insurance policies.

18. If you answered “yes” to #15 above, provide full explanations for each of the claims that were thwarted or otherwise not established with a claim number, and how those attempts to place or file such claims were resolved or left unresolved.

**RESPONSE:**

This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 15. However, notwithstanding this request’s inapplicability, ICSOP objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks

information or documents beyond the scope of those matters currently at issue in this litigation.

Subject to and notwithstanding the foregoing objections, ICSOP is not a county or township. ICSOP is not employed by a county and/or township. ICSOP and its employees are not required by the state constitution, state laws, and/or county ordinances to maintain oaths and bonds. ICSOP does not have any of the “above categories of individual bonds, blanket bonds, or insurance policies” listed in Plaintiff’s interrogatories and consequently, no one has “placed or filed any claims – or attempted to place or file any claims” against such individual bonds, blanket bonds, or insurance policies.

19. For each of the years cited above (2011, 2012, 2013, 2014, 2015, 2016) has anyone filed any court cases in local district court, county circuit court, or in federal court citing any form of violation of officers’ or employees’ breach of trust, violation of oath, faithful discharge of duties, or performance such as by claims of physical abuse, wrongful death, tort, misfeasance or malfeasance, or other forms of liability?

**RESPONSE:**

ICSOP objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. ICSOP also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-

client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine.

Subject to and notwithstanding the foregoing objections, information regarding legal actions that are completely unrelated to any matter currently at issue in this litigation is beyond the scope of the Federal Rules of Civil Procedure and is not subject to discovery here.

20. If you answered “yes” to #19 above, provide case numbers, case captions, name of the judge or judges assigned to the cases, names of the litigants, the contact information for all parties to these cases, and the outcome of the case, including amounts of awards issued by the court(s).

**RESPONSE:**

This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, ICSOP objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. ICSOP also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-

**client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine.**

**Subject to and notwithstanding the foregoing objections, information regarding legal actions that are completely unrelated to any matter currently at issue in this litigation is beyond the scope of the Federal Rules of Civil Procedure and is not subject to discovery here.**

21. If you answered “yes” to #19 above, provide the name of all parties involved in any out of court settlements and the names of all cases which have been “sealed” or otherwise undisclosed of the terms by which such cases were resolved.

**RESPONSE:**

**This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, ICSOP objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. ICSOP also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any**

other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine.

Subject to and notwithstanding the foregoing objections, information regarding legal actions that are completely unrelated to any matter currently at issue in this litigation is beyond the scope of the Federal Rules of Civil Procedure and is not subject to discovery here.

22. If you answered “yes” to #19 above, provide the name of all parties involved in any out of court settlements and the names of all cases which have been “sealed” or otherwise undisclosed of the terms by which such cases were resolved.

**RESPONSE:**

This interrogatory is not applicable because ICSOP did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, ICSOP objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. ICSOP also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is

intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine.

Subject to and notwithstanding the foregoing objections, information regarding legal actions that are completely unrelated to any matter currently at issue in this litigation is beyond the scope of the Federal Rules of Civil Procedure and is not subject to discovery here.

23. If you answered "yes" to #19 above, were any "claims" made upon bonds, blanket bonds, or insurance policies as part of or an aftermath result of the resolve of such claims and/or rulings against officers and/or employees performance?

**RESPONSE:**

This interrogatory is not applicable because ICSOP did not answer "Yes" to Interrogatory No. 19. However, notwithstanding this request's inapplicability, ICSOP objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. ICSOP also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege,

any work product privilege, joint defense privilege or any other applicable privilege or doctrine.

Subject to and notwithstanding the foregoing objections, ICSOP does not have any bonds, blanket bonds, or insurance policies upon which claims were made as part of legal actions “citing any form of violation of officers’ or employees’ breach of trust, violation of oath, faithful discharge of duties, or performance such as by claims of physical abuse, wrongful death, tort, misfeasance or malfeasance, or other forms of liability.” Answering further, such legal actions are completely unrelated to any matter currently at issue in this litigation, are beyond the scope of the Federal Rules of Civil Procedure and are not subject to discovery here.

**OBJECTIONS AND RESPONSES TO ADDITIONAL QUESTIONS FOR  
PLUNKETT COONEY ATTORNEYS AND THEIR CLIENTS**

24. For each of the above named individuals, being Creamer, Drake and Ulrich, provide the current position, the company employing each, and the last 10 years of employment history, or as far back as the time in which they were first employed [sic] AIG and/or any of its “shell” company, subsidiaries, or associate enterprises.

**RESPONSE:**

ICSOP objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.



**Subject to and notwithstanding the foregoing objections, the individuals referenced by Plaintiff in this interrogatory appear to be senders and/or recipients of emails to or from Krystal Price regarding claim number 030-314346, which claim is completely unrelated to any matter currently at issue in this litigation. Such emails are attached as Exhibit D to Plaintiff's Response to Defendants' Motion for Summary Judgment (Doc # 108, Pg ID 8215-8219).**

**Answering further, Krystal Price is not a party to this action. Krystal Price's claim and allegations against Wayne County are not relevant to any party's claims or defenses and are wholly unrelated to the allegations made by Plaintiff David Schied in this action.**

25. For each of the above-named individuals, being Creamer, Drake and Ulrich, how many other claims numbers have been directly issued, directly assigned to others for processing, or directly investigated or resolved by Creamer, by Drake, and by Ulrich?

**RESPONSE:**

**ICSOP objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, the individuals referenced by Plaintiff in this interrogatory appear to be senders and/or recipients of emails to or from Krystal Price regarding claim number 030-314346, which claim is completely unrelated to any matter currently at issue in this litigation. Such emails are**

attached as Exhibit D to Plaintiff's Response to Defendants' Motion for Summary Judgment (Doc # 108, Pg ID 8215-8219).

Answering further, the number of other claim numbers that "have been directly issued, directly assigned to others for processing, or directly investigated or resolved by Creamer, by Drake and by Ulrich" has absolutely no bearing on the instant action and is not relevant to any party's claims or defenses.

26. Is Julie Ulrich-Barrueco in any way a blood-relative to Robert Ulrich?

**RESPONSE:**

ICSOP objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.

Subject to and notwithstanding the foregoing objections, the individuals referenced by Plaintiff in this interrogatory appear to be senders and/or recipients of emails to or from Krystal Price regarding claim number 030-314346, which claim is completely unrelated to any matter currently at issue in this litigation. Such emails are attached as Exhibit D to Plaintiff's Response to Defendants' Motion for Summary Judgment (Doc # 108, Pg ID 8215-8219).

Answering further, Julie Ulrich-Barrueco's familial relationship to Robert Ulrich, or lack thereof, has absolutely no bearing on the instant action and is not relevant to any party's claims or defenses.

27. What is the employment background of Julie Ulrich-Barrueco, before and after her name change, as it pertains to all history of her employment as an attorney, and as it pertains to all history of her employment with the AIG conglomerate of companies, affiliates, subsidiaries, and/or shell companies?

**RESPONSE:**

**ICSOP objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, the individual referenced by Plaintiff in this interrogatory appears to be a sender and/or recipient of emails to or from Krystal Price regarding claim number 030-314346, which claim is completely unrelated to any matter currently at issue in this litigation. Such emails are attached as Exhibit D to Plaintiff's Response to Defendants' Motion for Summary Judgment (Doc # 108, Pg ID 8215-8219).**

**Answering further, the employment background of Julie Ulrich-Barrueco has absolutely no bearing on the instant action and is not relevant to any party's claims or defenses.**

28. Why did each of Michael Creamer, Jim Drake, and Robert Ulrich appear to be assigning Krystal Price's case "up" the chain of commands to Julie Ulrich, an attorney in New

York, rather than to claims adjusters employed by the Insurance Company for the State of Pennsylvania (“ICSOP”) as Plunkett-Cooney attorneys claim, and the evidence shows, that the policy issued between the Charter County of Wayne and “ICSOP”?

**RESPONSE:**

**ICSOP objects to this interrogatory because it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation.**

**Subject to and notwithstanding the foregoing objections, the individuals referenced by Plaintiff in this interrogatory appear to be senders and/or recipients of emails to or from Krystal Price regarding claim number 030-314346, which claim is completely unrelated to any matter currently at issue in this litigation. Such emails are attached as Exhibit D to Plaintiff’s Response to Defendants’ Motion for Summary Judgment (Doc # 108, Pg ID 8215-8219).**

**Answering further, Krystal Price is not a party to this action. Krystal Price’s claim and allegations against Wayne County are not relevant to any party’s claims or defenses and are wholly unrelated to the allegations made by Plaintiff David Schied in this action.**

29. Was the assignment of Krystal Price’s claim number unusual in any way, or are there written policies and practices set into place governing how claim numbers and claim processing against policies are issued claim numbers and managed?

**RESPONSE:**

ICSOP objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. ICSOP further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. Additionally, ICSOP objects to this interrogatory, pursuant to Fed. R. Civ. P. 33(a)(1) which limits the number of written interrogatories a party may serve on another party to 25, including all discrete subparts, unless otherwise stipulated or ordered by the Court. ICSOP has not stipulated nor agreed to respond to interrogatories in excess of the 25 allowed by the Federal Rules, nor has Plaintiff David Schied sought leave of Court to serve additional interrogatories.

Subject to and notwithstanding the foregoing objections, Krystal Price is not a party to this action. Krystal Price's claim and allegations against Wayne County are not relevant to any party's claims or defenses and are wholly unrelated to the allegations made by Plaintiff David Schied in this action.

30. If there are written policies in place on how claims are to be managed by ANY of the companies named as affiliated with AIG, as named by the Plunkett-Cooney's filing of "Motion for Summary Judgment," provide copies of all such policies and procedures from each company.

**RESPONSE:**

ICSOP objects to this request for production because it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this request for production is vague and/or overbroad. ICSOP further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. Additionally, ICSOP objects to this request for production to the extent it seeks information containing trade secrets or other confidential or proprietary business information of ICSOP and/or third parties.

Subject to and notwithstanding the foregoing objections, Wayne County, the only named insured under the ICSOP Policy, has not presented a claim to ICSOP based on the allegations of Plaintiff David Schied in the instant action. ICSOP's claims handling policies and procedures are not relevant to any party's claims or defenses in this action.

Respectfully submitted,

/s/Warren J. White

Charles W. Browning (P32978)

Warren J. White (P73239)

PLUNKETT COONEY

***Attorneys for The Insurance Company of the State of Pennsylvania***

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(248) 901-4000

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[wwhite@plunkettcooney.com](mailto:wwhite@plunkettcooney.com)

Dated: May 2, 2016

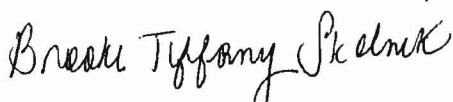
**VERIFICATION AS TO INTERROGATORY ANSWERS**

I, Steven Muhlstock, am authorized to make this Verification on behalf of The Insurance Company of the State of Pennsylvania ("ICSOP") in this action. I have read the foregoing Defendant, The Insurance Company of the State of Pennsylvania's Objections and Responses to Plaintiff David Schied's First Interrogatories and Requests for Exhibits Directed to Defendants, and while I do not have personal knowledge of all of the facts recited to in the answers to those Interrogatories, said answers to Interrogatories are true to the best of my knowledge, or information and belief.

Dated: April 29, 2016

BY:   
Steven Muhlstock

Sworn and subscribed to before me  
this 29<sup>th</sup> day of April 2016

  
Notary Public

BROOKE TIFFANY SKOLNIK  
Notary Public, State of New York  
No. 02SK6164875  
Qualified in Richmond County 19  
Commission Expires April 30, 2019

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 2nd day of May, 2016, a copy of *Defendant, The Insurance Company of the State of Pennsylvania's Objections and Responses to Interrogatories and Request for Exhibits* and this *Certificate of Service* were served upon all counsel of record and Plaintiff via U.S. Mail, postage prepaid, to the following addresses:

Zenna Elhasan P67961  
Wayne County Corporation Counsel  
Davidde A. Stella P69948  
Assistant Corporation Counsel  
500 Griswold St., 11<sup>th</sup> Floor  
Detroit, MI 48226  
(313) 224-5030  
[dstella@waynecounty.com](mailto:dstella@waynecounty.com)  
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*Attorney for MMRMA*

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(734) 261-2400  
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*Attorney for Karen Khalil, Cathleen Dunn,  
Joseph Bommarito, James Turner, David  
Holt, Jonathan Strong, "Police Officer"  
Butler, John Schipani, Redford Township  
Police Department, Redford Township 7<sup>th</sup>  
District Court, Tracey Schultz Kobylarz  
and the Charter Township of Redford*

David Schied  
P.O. Box 1378  
Novi, MI 48376

/s/Warren J. White  
Charles W. Browning (P32978)  
Warren J. White (P73239)  
PLUNKETT COONEY



**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF MICHIGAN  
SOUTHERN DIVISION**

DAVID SCHIED, Individually,

Plaintiff,

V.

Case No. 2:15-cv-11840

Hon. Avern Cohn

Magistrate Stephanie Dawkins Davis

KAREN KHALIL, in her individual capacity,  
CATHLEEN DUNN, in her individual capacity,  
JOSEPH BOMMARITO, in his individual capacity,  
JAMES TURNER, in his individual capacity  
DAVID HOLT, in his individual capacity  
JONATHAN STRONG, in his individual capacity  
"POLICE OFFICER" BUTLER, in his individual capacity,  
JOHN SCHIPANI, in his individual capacity  
REDFORD TOWNSHIP POLICE, DEPARTMENT,  
REDFORD TOWNSHIP 17<sup>TH</sup> DISTRICT COURT,  
TRACEY SCHULTZ-KOBYLARZ, in her individual capacity,  
CHARTER TOWNSHIP OF REDFORD,  
CHARTER COUNTY OF WAYNE,  
MICHIGAN MUNICIPAL RISK  
MANAGEMENT AUTHORITY ("MMRMA"),  
THE INSURANCE COMPANY OF THE  
STATE OF PENNSYLVANIA, ("ICSOP"),  
AMERICAN INTERNATIONAL GROUP, INC. ("AIG"), and  
DOES 1-10

Defendants.

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**DEFENDANT, AMERICAN INTERNATIONAL GROUP, INC.'S OBJECTIONS AND  
RESPONSES TO PLAINTIFF DAVID SCHIED'S FIRST INTERROGATORIES AND  
REQUESTS FOR EXHIBITS**

American International Group, Inc. ("AIG"), by and through its counsel, Plunkett Cooney, pursuant to Fed. R. Civ. P. 33 and 34, states its Objections and Responses to Plaintiff David Schied's First Interrogatories and Requests for Exhibits as follows:

## **PRELIMINARY STATEMENT**

The objections and statements set forth in this Section and the following Section entitled "Objections to Discovery Requests" apply to each of Plaintiff's David Schied's First Interrogatories and Requests for Exhibits and are not necessarily repeated in response to each individual request. The assertion of the same, similar or additional objections in AIG's specific objections to individual interrogatories and/or requests for production or the failure to assert any additional objection does not waive any of AIG's objections in this section or the following section.

## **OBJECTIONS TO DISCOVERY REQUESTS**

1. AIG objects to these Discovery Requests, pursuant to Fed. R. Civ. P. 33(a)(1) which limits the number of written interrogatories a party may serve on another party to 25, including all discrete subparts, unless otherwise stipulated or ordered by the Court. AIG has not stipulated nor agreed to respond to interrogatories in excess of the 25 allowed by the Federal Rules, nor has Plaintiff David Schied sought leave of Court to serve additional interrogatories.

## **AIG'S DEFINITIONS**

As used in AIG's Objections and Responses to Plaintiff David Schied's First Interrogatories and Requests for Exhibits ("Discovery Requests" or "Requests"), the following definitions shall apply:

1. **"AIG"** means American International Group, Inc.
2. **"Defendants"** means The Insurance Company of the State of Pennsylvania and American International Group, Inc., collectively.
3. **"ICSOP"** means The Insurance Company of the State of Pennsylvania.

4. **"ICSOP Policy"** means Special Excess Liability Policy for Public Entities No. 1130137 issued by The Insurance Company of the State of Pennsylvania to Named Insured Wayne County for the policy period May 15, 2012, to May 1, 2013.

5. **"Plaintiff"** means Plaintiff David Schied.

6. **"Wayne County"** means Charter County of Wayne.

**RESERVATION OF RIGHTS AND RIGHT TO AMEND**

The following Objections and Responses are based upon information and documents presently known to AIG or believed to be applicable to AIG at the time of responding to these Requests. AIG reserves the right to further modify, amend and/or supplement the Objections and Responses set forth below if and when they learn of new information through discovery or otherwise. AIG will supplement these Responses to the extent required under the Federal Rules of Civil Procedure and will produce additional responsive information, documents and/or material if and when such information becomes available.

**OBJECTIONS AND RESPONSES TO  
INTERROGATORIES FOR ALL TO ANSWER**

1. Do you have county and/or township officers, employees, assigned guardians, clerks, treasurers, constables, purchasing agents, commissioners, county auditors, deputies, register of deeds, directors, legal counsel, secretaries, board members, chief executive officers, board members, school board members, magistrates, bailiffs, police officers, court reporters, attorneys, prosecuting attorneys, or other personnel who are required by the state constitution, state laws, and/or county ordinances to maintain Oaths and Bonds in guarantee and surety on their "honesty," their "faithful discharge" and/or performance of their respective duties of office and/or employment?

**RESPONSE:**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

2. If answering "yes" to #1 above, name each person required to have such oaths and bonds and given the location where each can be found and provide proof by copies of only their bonds.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer "Yes" to Interrogatory No. 1. However, notwithstanding this interrogatory's inapplicability, AIG objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

3. If answering "no" to #1 above, name each person so employed in any of the above-listed positions being employed by the county and/or township without such a bond in guarantee of their oath and as surety against their "honesty," their "faithful discharge" and/or performance of their respective duties of office and/or employment.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “No” to Interrogatory No. 1. However, notwithstanding this interrogatory’s inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

4. If answering “no” to #1 above, give the reason for each person not complying with the state constitution, state statutes and/or county ordinances and provide proofs to support your answers.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 1. However, notwithstanding this interrogatory’s inapplicability, AIG objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

5. In lieu of any individual bonds required by state laws to be provided by any or all of the above-named officers and employees of the county and/or township as

depicted by #1 above, do you have any “blanket” bonds covering any portion of those named employment positions?

**RESPONSE:**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

6. If answering “yes” to #5 above, provide the name and holding location of each such “blanket” bond and for each bond, give the names of all such persons covered in surety on their honesty, faithful discharge of duties, and performance.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 5. However, notwithstanding this interrogatory’s inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

7. If answering “yes” to #5 above, provide the name of the surety company providing issuance of such blanket bonds and the respective dates of such issuance.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 5. However, notwithstanding this interrogatory’s inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

8. If answering “yes” to #5 above, provide copies of each such “blanket” bonds.

**RESPONSE:**

**This request for production is not applicable because AIG did not answer “Yes” to Interrogatory No. 5. However, notwithstanding this request’s inapplicability. AIG objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this request for production is vague and/or overbroad. AIG further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this request for production for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

9. Does your county or township have any “self-funded” and/or third party “excess” or other type of insurance policies that guarantee or provide surety to the

taxpayers and/or others to whom oaths, honesty, and faithful discharge of duties, and performance is to be held accountable?

**RESPONSE:**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

10. If answering "yes" to #5 [sic] above, provide the name and holding location of each such policy and for each policy, give the names of all such persons covered in surety on their honesty, faithful discharge of duties, and performance.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer "Yes" to Interrogatory No. 9. However, notwithstanding this interrogatory's inapplicability, AIG objects to this interrogatory to the extent it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

11. If answering "yes" to #5 [sic] above, provide the name of the surety company providing issuance of such policies and the respective dates of such issuance.



**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 9. However, notwithstanding this interrogatory’s inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

12. If answering “yes” to #5 [sic] above, provide copies of each such policies.

**RESPONSE:**

**This request for production is not applicable because AIG did not answer “Yes” to Interrogatory No. 9. However, notwithstanding this request’s inapplicability, AIG objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this request for production is vague and/or overbroad. AIG further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this request for production for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

13. If answering “no” to the above, does your county or township have any “self-funded” and/or third party “excess” or other type of insurance policies that indemnify any

of the categories of officers and employees cited in #1 above against claims or court findings and/or rulings determining “tort”, “errors and omissions”, or any other form of “liability” without providing any guarantees directly to the taxpayers for such types of breaches of “faithful” discharge and performance of duties in accordance with those officers’ and employees’ oath of office?

**RESPONSE:**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is ambiguous, vague and/or overbroad. AIG further objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

14. If you answered “yes” to #13 above, please provide copies of all such “self-funded” or third-party insurance policies.

**RESPONSE:**

**This request for production is not applicable because AIG did not answer “Yes” to Interrogatory No. 13. However, notwithstanding this request’s inapplicability, AIG objects to this request for production to the extent it seeks information and/or the production of materials that are not relevant to any party’s claims or defenses and because this request for production is vague and/or overbroad. AIG further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in**

**this litigation. AIG also objects to this request for production for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

15. For each of the years cited above (2011, 2012, 2013, 2014, 2015, 2016) has anyone placed or filed any claims – or attempted to place or file any claims – against any of the above categories of individual bonds, blanket bonds, or insurance policies based upon reports, notifications or other forms of communication indicating any level of violation or any officer or employee’s Oath, faithful discharge or performance of duties?

**RESPONSE:**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

16. If you answered “yes” to #15 above, provide names of all such individual [sic] placing or filing such claims.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 15. However, notwithstanding this interrogatory’s inapplicability,**

**AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

17. If you answered "yes" to #15 above, provide claim numbers for each of the claims successfully established and explain how each was resolved.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer "Yes" to Interrogatory No. 15. However, notwithstanding this interrogatory's inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

18. If you answered “yes” to #15 above, provide full explanations for each of the claims that were thwarted or otherwise not established with a claim number, and how those attempts to place or file such claims were resolved or left unresolved.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 15. However, notwithstanding this request’s inapplicability, AIG objects to this interrogatory to the extent it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

19. For each of the years cited above (2011, 2012, 2013, 2014, 2015, 2016) has anyone filed any court cases in local district court, county circuit court, or in federal court citing any form of violation of officers’ or employees’ breach of trust, violation of oath, faithful discharge of duties, or performance such as by claims of physical abuse, wrongful death, tort, misfeasance or malfeasance, or other forms of liability?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this**

**interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

20. If you answered “yes” to #19 above, provide case numbers, case captions, name of the judge or judges assigned to the cases, names of the litigants, the contact information for all parties to these cases, and the outcome of the case, including amounts of awards issued by the court(s).

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of**

Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.

21. If you answered “yes” to #19 above, provide the name of all parties involved in any out of court settlements and the names of all cases which have been “sealed” or otherwise undisclosed of the terms by which such cases were resolved.

**RESPONSE:**

This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory to

**the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

22. If you answered “yes” to #19 above, provide the name of all parties involved in any out of court settlements and the names of all cases which have been “sealed” or otherwise undisclosed of the terms by which such cases were resolved.

**RESPONSE:**

**This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense**



privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.

23. If you answered “yes” to #19 above, were any “claims” made upon bonds, blanket bonds, or insurance policies as part of or an aftermath result of the resolve of such claims and/or rulings against officers and/or employees performance?

**RESPONSE:**

This interrogatory is not applicable because AIG did not answer “Yes” to Interrogatory No. 19. However, notwithstanding this request’s inapplicability, AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory to the extent it seeks information or documents protected from discovery by the attorney-client privilege, the attorney work product doctrine, the joint defense privilege or any other applicable privilege or doctrine. Nothing contained in these objections is intended as, or shall in any way be deemed, a waiver of any attorney-

**client privilege, any work product privilege, joint defense privilege or any other applicable privilege or doctrine. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

**OBJECTIONS AND RESPONSES TO ADDITIONAL QUESTIONS FOR  
PLUNKETT COONEY ATTORNEYS AND THEIR CLIENTS**

24. For each of the above named individuals, being Creamer, Drake and Ulrich, provide the current position, the company employing each, and the last 10 years of employment history, or as far back as the time in which they were first employed [sic] AIG and/or any of its “shell” company, subsidiaries, or associate enterprises.

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party’s claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

25. For each of the above-named individuals, being Creamer, Drake and Ulrich, how many other claims numbers have been directly issued, directly assigned to others for processing, or directly investigated or resolved by Creamer, by Drake, and by Ulrich?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

26. Is Julie Ulrich-Barrueco in any way a blood-relative to Robert Ulrich?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

27. What is the employment background of Julie Ulrich-Barrueco, before and after her name change, as it pertains to all history of her employment as an attorney, and as

it pertains to all history of her employment with the AIG conglomerate of companies, affiliates, subsidiaries, and/or shell companies?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is vague and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

28. Why did each of Michael Creamer, Jim Drake, and Robert Ulrich appear to be assigning Krystal Price's case "up" the chain of commands to Julie Ulrich, an attorney in New York, rather than to claims adjusters employed by the Insurance Company for the State of Pennsylvania ("ICSOP") as Plunkett-Cooney attorneys claim, and the evidence shows, that the policy issued between the Charter County of Wayne and "ICSOP"?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks**

**information or documents beyond the scope of those matters currently at issue in this litigation. AIG also objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

29. Was the assignment of Krystal Price's claim number unusual in any way, or are there written policies and practices set into place governing how claim numbers and claim processing against policies are issued claim numbers and managed?

**RESPONSE:**

**AIG objects to this interrogatory because it seeks information that is not relevant to any party's claims or defenses and because this interrogatory is speculative, vague, ambiguous and/or overbroad. AIG further objects to this interrogatory to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. Additionally, AIG objects to this interrogatory, pursuant to Fed. R. Civ. P. 33(a)(1) which limits the number of written interrogatories a party may serve on another party to 25, including all discrete subparts, unless otherwise stipulated or ordered by the Court. AIG has not stipulated nor agreed to respond to interrogatories in excess of the 25 allowed by the Federal Rules, nor has Plaintiff David Schied sought leave of Court to serve additional interrogatories. Finally, AIG objects to this interrogatory for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

30. If there are written policies in place on how claims are to be managed by ANY of the companies named as affiliated with AIG, as named by the Plunkett-Cooney's filing of "Motion for Summary Judgment," provide copies of all such policies and procedures from each company.

**RESPONSE:**

**AIG objects to this request for production because it seeks information and/or the production of materials that are not relevant to any party's claims or defenses and because this request for production is vague and/or overbroad. AIG further objects to this request for production to the extent that it: (a) seeks information or documents beyond the scope of the Federal Rules of Civil Procedure; and (b) seeks information or documents beyond the scope of those matters currently at issue in this litigation. Additionally, AIG objects to this request for production to the extent it seeks information containing trade secrets or other confidential or proprietary business information of AIG and/or third parties. Finally, AIG objects to this request for production for the reason that AIG is not a proper defendant in this action and cannot be held liable to Plaintiff.**

Respectfully submitted,

/s/Warren J. White

Charles W. Browning (P32978)

Warren J. White (P73239)

PLUNKETT COONEY

***Attorneys for American International Group, Inc.***

38505 Woodward Avenue, Suite 2000

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[cbrowning@plunkettcooney.com](mailto:cbrowning@plunkettcooney.com)

[wwhite@plunkettcooney.com](mailto:wwhite@plunkettcooney.com)

Dated: May 2, 2016

**CERTIFICATE OF SERVICE**

The undersigned certifies that on the 2nd day of May, 2016, a copy of ***American International Group, Inc.'s Objections and Responses to Interrogatories and Request for Exhibits*** and this ***Certificate of Service*** were served upon all counsel of record and Plaintiff via U.S. Mail, postage prepaid, to the following addresses:

Zenna Elhasan P67961  
Wayne County Corporation Counsel  
Davidde A. Stella P69948  
Assistant Corporation Counsel  
500 Griswold St., 11<sup>th</sup> Floor  
Detroit, MI 48226  
(313) 224-5030  
[dstella@waynecounty.com](mailto:dstella@waynecounty.com)  
[dstella@co.wayne.mi.us](mailto:dstella@co.wayne.mi.us)  
*Attorneys for Wayne County*

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248-649-1330  
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*Attorney for MMRMA*

Jeffrey R. Clark P33074  
33900 Schoolcraft Road  
Livonia, MI 48150  
(734) 261-2400  
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*Attorney for Karen Khalil, Cathleen Dunn,  
Joseph Bommarito, James Turner, David Holt,  
Jonathan Strong, "Police Officer" Butler, John  
Schipani, Redford Township Police  
Department, Redford Township 7<sup>th</sup> District  
Court, Tracey Schultz Kobylarz and the  
Charter Township of Redford*

David Schied  
P.O. Box 1378  
Novi, MI 48376

*/s/Warren J. White*  
Charles W. Browning (P32978)  
Warren J. White (P73239)  
PLUNKETT COONEY

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PLUNKETT  COONEY

May 2, 2016

***Via Certified Mail***

David Schied  
PO Box 1378  
Novi, MI 48376

Re: *David Schied v The Insurance Company of the State of Pennsylvania, et al.*  
Case No. 2:15-cv-11840  
Our File No. 00085.51489

Dear Mr. Schied:

Enclosed is a copy of the following:

- 1) The Insurance Company of the State of Pennsylvania's Objections and Responses to David Schied's First Interrogatories and Requests for Exhibits, together with a Certificate of Service.
- 2) American International Group, Inc.'s Objections and Responses to David Schied's First Interrogatories and Requests for Exhibits, together with a Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Very truly yours,



Warren J. White  
PLUNKETT COONEY  
248.901.4000  
[wwhite@plunkettcooney.com](mailto:wwhite@plunkettcooney.com)

WJW:pm

Encl.

Cc. Davidde A. Stell  
James T. Mellon  
Jeffrey R. Clark



PLUNKETT  COONEY

June 10, 2016

**Via U.S. Mail**

David Schied  
PO Box 1378  
Novi, MI 48376

Re: *David Schied v The Insurance Company of the State of Pennsylvania, et al.*  
Case No. 2:15-cv-11840  
Our File No. 00085.51489

Dear Mr. Schied:

Enclosed is a copy of the following:

- 1) The Insurance Company of the State of Pennsylvania's Objections and Responses to David Schied's First Interrogatories and Requests for Exhibits, together with a Certificate of Service.
- 2) American International Group, Inc.'s Objections and Responses to David Schied's First Interrogatories and Requests for Exhibits, together with a Certificate of Service.

These documents were previously sent to your attention on May 2, 2016, via certified mail, return receipt requested, however, the documents were returned to our office as unclaimed. If you have any questions, please do not hesitate to contact me.

Very truly yours,



Warren J. White  
PLUNKETT COONEY  
248.901.4000  
[wwhite@plunkettcooney.com](mailto:wwhite@plunkettcooney.com)

WJW:pm  
Encl.