

CAUSE NO. D-1-GN-15-002291

BRIAN RODGERS,

Plaintiff,

v.

THE CITY OF AUSTIN,  
Defendant.

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IN THE DISTRICT COURT

OF TRAVIS COUNTY, TEXAS

98<sup>TH</sup> JUDICIAL DISTRICT COURT

**DEFENDANT’S RESPONSE TO PLAINTIFF’S SECOND  
REQUEST FOR ADMISSIONS**

To: Plaintiff, by and through his attorney of record, Bill Aleshire, AleshireLAW, P.C., 700 Lavaca, Suite 1400, Austin, Texas 78701.

Pursuant to the Texas Rules of Civil Procedure, Defendant, City of Austin, Texas serves its Responses to Plaintiff’s Second Request for Admissions.

**DEFENDANT’S RESPONSE TO PLAINTIFF’S SECOND  
REQUEST FOR ADMISSIONS**

1. You do not have a record of what documents You provided to Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 in response to the Rodgers PIR contained in Exhibit P-1 attached to, and referenced in Paragraph 6 in Plaintiff’s Original Petition in this case.

**RESPONSE:**

The City admits that it did not provide documents responsive to P-1 prior to July 6, 2015. Therefore, the City admits that it does not have a record documents provided prior to July 6, 2015.

2. You do not have a record of what documents You provided to Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 in response to the Rodgers PIR contained in Exhibit P-2 attached to, and referenced in Paragraph 7 in Plaintiff’s Original Petition in this case.

**RESPONSE:**

The City admits that it may not have a complete record of documents it provided prior to

July 6, 2015.

3. You do not have a record of what documents You provided to Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 in response to the Rodgers PIR contained in Exhibit P-3 attached to, and referenced in Paragraph 8 in Plaintiff's Original Petition in this case.

**RESPONSE:**

The City denies.

4. You do not have a record of what documents You provided to Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 in response to the Rodgers PIR contained in Exhibit P-4 attached to, and referenced in Paragraph 9 in Plaintiff's Original Petition in this case.

**RESPONSE:**

The City admits that it may not have a complete record of documents it provided prior to July 6, 2015.

5. You do not have a record of what documents You provided to Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 in response to the Rodgers PIR contained in P-2, P-3, and P-4 (first pages) attached to, and referenced in Paragraph 10 in Plaintiff's Original Petition in this case.

**RESPONSE:**

The City denies.

6. You do not have a record of what correspondence You had with Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 referenced in Paragraph 7(a) and 7(b) in Plaintiff's Original Petition in this case.

**RESPONSE:**

The City denies.

7. You do not have a record of what correspondence You had with Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 referenced in Paragraph 10(a) – 10(c) in Plaintiff's Original Petition in this case.

**RESPONSE:**

The City denies.

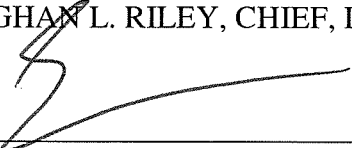
8. You do not have a record of what correspondence You had with Plaintiff (or his attorney Bill Aleshire) prior to July 6, 2015 referenced in Paragraph 11(a) 11(c) in Plaintiff's

Original Petition in this case.

**RESPONSE:**

The city admits that it may not have a complete record of all correspondence referenced in Paragraph 11(a), but otherwise denies.

RESPECTFULLY SUBMITTED,  
ANNE L. MORGAN, INTERIM CITY ATTORNEY  
MEGHAN L. RILEY, CHIEF, LITIGATION



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CHRISTOPHER COPPOLA  
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Austin, Texas 78767-1546  
(512) 974-2161  
(512) 974-1311 [FAX]  
**ATTORNEYS FOR DEFENDANT**

**CERTIFICATE OF SERVICE**

I certify that, on the 8<sup>th</sup> day of September, 2015, I served a copy of *Defendant's Response to Plaintiff's Second Request for Admissions* on Plaintiff, by and through its attorney of record, in compliance with the Texas Rules of Civil Procedure.

**Via E-Service to:**

Bill Aleshire  
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**ATTORNEY FOR PLAINTIFF**



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CHRISTOPHER COPPOLA