

IN THE SUPERIOR COURT OF FORSYTH COUNTY

STATE OF GEORGIA

HIGH GABLES HOMEOWNERS  
ASSOCIATION, INC.,

Plaintiff,

v.

LARRY C. OLDHAM,

Defendant.

Civil Action File No. 05-CV-2005

**DEFENDANT'S RESPONSE  
TO FIRST REQUEST FOR PRODUCTION OF PLAINTIFF**

COMES NOW Defendant Larry C. Oldham and shows the Court the following for his response to the First Requests for Production of Plaintiff High Gables Homeowners Association, Inc. (the "Requests for Production"):

**GENERAL OBJECTIONS**

The following general objections are incorporated into each of the specific responses of Defendant to Plaintiff's Requests for Production as if fully set forth therein:

Defendant objects to Plaintiff's Requests for Production to the extent they attempt to require supplementation of answers exceeding the requirements of O.C.G.A. § 9-11-26.

Defendant objects to the definitions and instructions contained in Plaintiff's Requests for Production to the extent they seek to impose on Defendant duties not set forth in the Georgia Civil Practice Act (the "GCPA"). Defendant also objects to Requests for Production which seek information that is (i) protected by the attorney/client privilege, (ii) within the scope of the attorney work product doctrine, or (iii) protected by any other legally cognizable privilege on the

grounds that such information is not discoverable and is beyond the scope of discovery allowed under the GCPA.

### SPECIFIC OBJECTIONS

Subject to and without waiving any of his general objections, Defendant responds to Plaintiff's Requests for Production as follows:

1.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 1.

2.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 2.

3.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 3.

4.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 4.

5.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 5.

6.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 6.

7.

Defendant objects to Request for Production No. 7 on the grounds that it seeks information that is not relevant to this Action and is not reasonably calculated to lead to the discovery of admissible evidence.

8.

Defendant objects to Request for Production No. 8 on the grounds that it seeks information that is not relevant to this Action and is not reasonably calculated to lead to the discovery of admissible evidence.

9.

Defendant has no documents responsive to Request for Production No. 9.

10.

Defendant has no documents responsive to Request for Production No. 10.

11.

Defendant has attached copies of all documents in his possession responsive to Request for Production No. 11.

12.

Defendant has no documents responsive to Request for Production No. 12.

13.

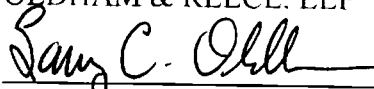
Defendant has no documents responsive to Request for Production No. 13.

14.

Defendant objects to Request for Production No. 14 on the grounds that it is vague and overly broad, that it is unduly burdensome, and that it seeks information that is not reasonably calculated to lead to the discovery of admissible evidence.

These Requests for Production are submitted to Plaintiff as of March 27, 2006.

OLDHAM & REECE, LLP



Larry C. Oldham

Georgia State Bar No. 551455

Attorneys for Defendant

416 Pirkle Ferry Road  
Suite K-500  
Cumming, Georgia 30040  
(770) 889-8557 (phone)

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RULE 5.2 CERTIFICATE

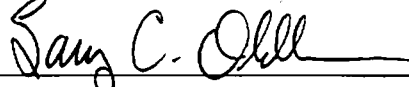
In accordance with Uniform Superior Court Rule 5.2, I hereby certify that on March 27, 2006 I have served **Defendant's Response to First Request for Production of Documents of Plaintiff** to opposing counsel of record by depositing same in the United States Mail with adequate postage thereon and addressed as follows:

P. Jay Pontrelli, Esq.  
Stites & Harbison, PLLC  
303 Peachtree Street, N.E.  
2800 SunTrust Plaza  
Atlanta, Georgia 30339

Peter R. York, Esq.  
Hawkins & Parnell, LLP  
4000 SunTrust Plaza  
303 Peachtree Street, N.E.  
Atlanta, Georgia 30308

So certified as of March 27, 2006.

OLDHAM & REECE, LLP



Larry C. Oldham

Georgia State Bar No. 551455

Attorneys for Defendant

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Cumming, Georgia 30040  
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**CERTIFICATE OF SERVICE**

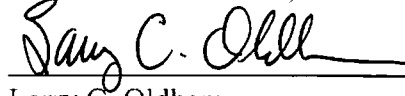
I hereby certify that I have delivered a true and correct copy of the within and foregoing **Defendant's Response to First Request for Production of Documents of Plaintiff** to opposing counsel of record by depositing same in the United States Mail with adequate postage thereon and addressed as follows:

P. Jay Pontrelli, Esq.  
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303 Peachtree Street, N.E.  
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So certified as of March 27, 2006.

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