

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

FLOYD RUFFIN,

PLAINTIFF,

VERSUS

BP EXPLORATION & PRODUCTION  
INC. and BP AMERICA PRODUCTION  
COMPANY,

DEFENDANTS.

Related to: 12-968 BELO  
in MDL No. 2179

CIVIL ACTION NO. 20-00334

JUDGE LEMELLE

MAGISTRATE  
JUDGE CURRAULT

\*\*\*\*\*

**INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS  
PROPOUNDED TO PLAINTIFF BY DEFENDANTS BP EXPLORATION &  
PRODUCTION INC. AND BP AMERICA PRODUCTION COMPANY**

To: Floyd Ruffin  
Through his Attorney of Record:  
Nathan Lee Nelson  
Charles David Durkee  
**The Downs Law Group, P.A.**  
3250 Mary Street, Suite 307  
Coconut Grove, FL 33133  
(305) 444-8226  
[nnelson@downslawgroup.com](mailto:nnelson@downslawgroup.com)  
[ddurkee@downslawgroup.com](mailto:ddurkee@downslawgroup.com)

**NOW INTO COURT**, through undersigned counsel, come BP Exploration & Production Inc. and BP America Production Company, to propound the following Interrogatories and Requests for Production of Documents **to the above-listed plaintiff individually** to be answered within the time provided by law. These Interrogatories are to be answered separately and fully under oath pursuant to Federal Rule of Civil Procedure 33. These discovery requests are deemed

to be continuing under Federal Rule of Civil Procedure 34, and the information sought by these discovery requests includes information in the possession of plaintiff, plaintiff's attorney, and other persons acting on plaintiff's behalf.

If the plaintiff objects to the production of any document or item requested, please list each document or item that the plaintiff has declined to produce, identifying each by date, description, originating source, recipient or person to whom directed, and include the plaintiff's grounds for objecting to the production of each document or item.

### **DEFINITIONS**

As used in these discovery requests, the terms below have the associated definitions:

A. "Document" or "documents" mean any writing of any kind, including originals and all non-identical copies (whether different from the originals by reason of any notation made on such copies or otherwise), including, but without limitation, correspondence, memoranda, notes, desk calendars, diaries, statistics, letters, emails, telegrams, minutes, contracts, reports, studies, checks, invoices, statements, receipts, returns, warranties, guaranties, summaries, pamphlets, books, prospectuses, interoffice and intra-office communications, offers, notations of any sort of conversation, telephone calls, meetings or other communications, bulletins, magazines, publications, printed matter, photographs, computer printouts, teletypes, telefax, worksheets, and all drafts, alterations, modifications, changes, and amendments of any of the foregoing, tapes, tape recordings, transcripts, graphic or oral records or representations of any kind, and electronic, mechanical or electric records or representations of any kind, of which you have knowledge, or which are now or were formerly in your actual or constructive possession, custody, or control.

B. "Possession, custody, or control" includes a joint and several possession, custody, or control not only by the person(s) to whom these discovery requests are addressed, but also the joint or several possession, custody, or control by each or any other person acting or purporting to act on behalf of the person(s), whether as employee, attorney, accountant, agent, sponsor, spokesman, or otherwise.

C. "Person" means any natural person, firm, corporation, partnership, proprietorship, joint venture, organization, group of natural persons, or other association separately identifiable, regardless of whether such association has a separate juristic existence in its own right.

D. "Identify," "identity," and "identification," when used to refer to a person means to state the following:

1. The person's full name, present or last known home address, home telephone number, business address, and business telephone number;
2. The person's present title and employer or other business affiliation; and
3. The person's employer and title at the time of the actions to which each Interrogatory is directed.

E. "Identify," "identity," and "identification," when used to refer to a document means to state the following:

1. The subject of the document;
2. The title of the document;
3. The type of document (*e.g.* letter, memorandum, chart);
4. The date of the document, or if the specific date thereof is unknown, the month and year or other best approximation of such date;
5. The identity of the person or persons who wrote, contributed to, prepared, or originated such document; and
6. The present or last known location and custodian of the document.

F. "Identify," "identity," or "identification," when used in reference to a physician means to include the full name, address, and specialty of such physician, along with the name and location of the institution at which the plaintiff received such medical service.

G. The phrases "medical facility" or "other health care institution" mean any and all facilities, institutions, and offices from which plaintiff obtained medical/surgical consultation, diagnostic evaluation, care and/or treatment, which are to include, but are not limited to, any and all laboratory, diagnostic, pathology, psychological, psychiatric, rehabilitative, respiratory, and/or ultrasound evaluation.

H. The word "physician" shall refer to all health-care providers, including physicians, surgeons, optometrists, dentists, psychiatrists, psychologists, D.O.s, chiropractors, physical therapists and/or their assistants, technicians, technologists or other staff.

I. "Radiograph" means any and all x-rays, CT scans, radiologic studies, and reports.

J. "You," "your," or "plaintiff" means Floyd Ruffin and all other persons purporting to act on his behalf.

K. "BP" means BP Exploration & Production Inc. and BP America Production Company.

L. “Deepwater Horizon Incident” refers to the April 2010 explosion and sinking of the Deepwater Horizon drilling rig, together with the resultant oil spill.

### **INTERROGATORIES**

#### **INTERROGATORY NO. 1:**

Please identify each and every person who, as part of your work in response to the Deepwater Horizon Incident, supervised you or was a co-worker with you.

#### **INTERROGATORY NO. 2:**

Please identify all persons known to you who may have knowledge concerning the facts and circumstances surrounding or related to your claims against BP, whether that knowledge relates to causation or damages, and provide a description of the facts known by such persons.

#### **INTERROGATORY NO. 3:**

Please identify all warnings, job and safety training, orientation, or instruction provided to you during your work related to the Deepwater Horizon Incident; when and where such job and safety training, orientation, or instruction was provided to you; who provided such job and safety training, orientation, or instruction; and any documents received by you as a result of that job and safety training, orientation, or instruction.

#### **INTERROGATORY NO. 4:**

Identify each clinic, facility, physician, health care provider, medical practitioner, or other person who interviewed, examined, diagnosed, treated, or in any way provided you with medical care for symptoms, injuries, and/or conditions (including psychiatric, psychological, or mental health treatment) **for any reason** during the past twenty (20) years, including for the injuries for which you have brought this lawsuit, stating the name of the hospital, clinic, or other location where services were rendered, whether services were in person or via telephone/telemedicine,

date(s) of each, the nature of the injury or condition addressed, the nature of the services rendered (interview, examination, diagnosis, treatment, other), and the details of any disability, permanent impairment, or dysfunction from such injury or illness.

**INTERROGATORY NO. 5:**

Identify fully each and every medication, drug, and/or pharmaceutical taken by you since the alleged exposure and for the five (5) years preceding the alleged exposure, and state the dose of the medication, what the medication was used for, and identify who prescribed it and the pharmacy at which it was filled.

**INTERROGATORY NO. 6:**

Identify each condition which you allege was caused by exposure from your work in response to the Deepwater Horizon Incident. Please include: the first date of diagnosis for each condition; the name and address of any medical personnel who interviewed, examined, diagnosed, and/or treated the condition along with a description of how and by whom you were referred to that person; the physician who has purportedly associated the illness with the Deepwater Horizon Incident; the date on which such association was made; and any corresponding records relating to the condition.

**INTERROGATORY NO. 7:**

Please itemize all expenses, including medical expenses, which you claim to have incurred as a result of your alleged injuries and, with respect to each item of expense listed, state the nature and amount thereof, the identity of each person charging such amount, identify the document evidencing such expense, the dates of each payment of those expenses, the identity of the person paying each listed expense, and for each expense you claim to have paid, please state whether you have been reimbursed for any of these payments, identifying the persons reimbursing you.

**INTERROGATORY NO. 8:**

Please specify the total length of time you were incapacitated from work as a result of the occurrence alleged in the Complaint, and please list the specific dates. Please itemize the amount of damages, including any lost wages, future medical expenses, and any other damages, for which you seek judgment and detail the basis for your computation of these damages.

**INTERROGATORY NO. 9:**

Please provide the exact dates/days during which you worked as part of the response to the Deepwater Horizon Incident; exactly what your work entailed on those days; the length of your shift on those days; whether you ever spotted oil during those days, including tar balls on the water or on shore; and if so, whether you reported the oil spotting to anyone. If you did report oil spotting to anyone, please also identify the person(s) to whom you reported the spotted oil; the date(s) on which you made such report(s); whether the report(s) were written or oral; the content of such report(s); and if written, whether you still have in your possession, custody, or control, the original or copies of such report(s).

**INTERROGATORY NO. 10:**

During the period you were working in response to the Deepwater Horizon Incident, please identify each incident of exposure to substance(s) that you allege caused your illness. For each such exposure event, please provide the following information:

- (a) The name and location of the premises or vessel on which you were working including—if a vessel—the precise location on the vessel;
- (b) The precise dates of each job during which you contend you were exposed to the substance(s) alleged to have caused your illness;
- (c) The identity of your employer and your supervisor on each such job;

- (d) The precise dates and intervals of time that you were exposed to the substance(s) alleged in your Complaint;
- (e) The type of work you were doing when you were allegedly exposed to the substance(s) you contend caused the illness;
- (f) How you became exposed to the substance(s) you contend caused your illness (e.g., through dermal contact, inhalation, ingestion, etc.);
- (g) A description of the substance(s) you were exposed to on the dates identified above;
- (h) How you know you were exposed to the substance(s); and
- (i) The identity of anyone else present on the premises or vessel on which you were working.

**INTERROGATORY NO. 11:**

If you have ever experienced exposure to substances or sources of contaminants and/or toxins (other than instances allegedly occurring in relation to your work on the Deepwater Horizon Incident), please identify each incident of exposure to such substance(s). For each such exposure event, please provide the following information:

- (a) The name and location of the premises or vessel on which you were working including—if a vessel—the precise location on the vessel;
- (b) The precise dates of each job during which you contend you were exposed to the substance(s) alleged to have caused your illness;
- (c) The identity of your employer and your supervisor on each such job;
- (d) The precise dates and intervals of time that you were exposed to the substances in question;
- (e) The type of work you were doing when you were allegedly exposed to the substance(s);
- (f) How you became exposed to the substance(s) (e.g., through dermal contact, inhalation, ingestion, etc.);
- (g) A description of the substance(s) you were exposed to;
- (h) How you know you were exposed to the substance(s); and

- (i) The identity of anyone else present on the premises or vessel on which you were working.

**INTERROGATORY NO. 12:**

Please identify the type of protective or safety equipment (e.g. goggles, glasses, gloves, hats, aprons, etc.) you were provided or instructed to use and the clothing (including any protective or safety equipment) you were actually wearing during each of the alleged exposures identified in Interrogatory No. 10 and Interrogatory No. 11 above.

**INTERROGATORY NO. 13:**

Have you ever been diagnosed with the medical condition(s) which are the subject of the current lawsuit prior to April 16, 2012? If so, please include information stating the name of the hospital, clinic, or other location where services were rendered, whether services were in person or via telephone/telemedicine, date(s) of each, the nature of the injury or condition addressed, the nature of the services rendered (interview, examination, diagnosis, treatment, other), and the details of any disability, permanent impairment, or dysfunction from such injury or illness; (a) for any diagnosis prior to April 20, 2010 and (b) for any diagnosis prior to April 16, 2012.

**INTERROGATORY NO. 14:**

Please list each and every employer that you ever had, including periods of part-time and self-employment. With respect to each employment, provide the following information:

- (a) Identify the employer;
- (b) Identify the location of the employment, including city, county (parish), state, and country;
- (c) State the beginning and ending dates of each employment;



- (d) Describe your titles, duties and responsibilities, and the places where you performed your job duties for each employment;
- (e) Identify your immediate supervisor(s);
- (f) State your rate of pay; and
- (g) State the reasons for the termination of each employment.

**INTERROGATORY NO. 15**

Please identify any malignancy, carcinoma, sarcoma, mesothelioma, and any other tumors, growths, or cancers which any of your brother(s), sister(s), parents(s), or grandparent(s) have contracted, including the type and location of the malignancy, carcinoma, sarcoma, mesothelioma, and other cancer and the date of diagnosis.

**INTERROGATORY NO. 16:**

Please identify any claims or lawsuits filed by you or on your behalf, any personal injury or illness claims asserted by you or on your behalf (including, but not limited to, any insurance or worker's compensation policy or for Social Security or SSI benefits), any bankruptcy claims or filings, any bankruptcy trust claims or submissions (e.g. asbestos or silica), personal injury trust claims or submissions, and/or any settlement of any claims (whether at issue in this lawsuit or otherwise) asserted by you or on your behalf including describing the nature and outcome of the claims or lawsuits; the parties involved; the date asserted; the title, court, and cause number (if any); the sums received to date as a result of any such lawsuits or claims; and the attorney(s) who represented you in connection with same.

**INTERROGATORY NO. 17:**

If you have ever been arrested, or charged, or pleaded guilty to, or been convicted of any crime or offense whatsoever, at any time, please state the nature of the offense, the date, the

county/parish and state involved with the charges, and the disposition of the charge or the sentence given to you if resolved, or, if still pending, the date of your next court appearance and the docket number and court name.

**INTERROGATORY NO. 18:**

Describe, with specificity, all of your efforts to mitigate damages, including all efforts to avoid any contact with the substance(s) alleged to have caused your condition, as well as all efforts to obtain gainful employment or return to employment.

**INTERROGATORY NO. 19:**

State whether you have previously received, are currently receiving, or anticipate applying or becoming eligible for Medicare, Medicaid, or Social Security Disability benefits within the next two years. If so, please identify the amount received or expected to be received.

**INTERROGATORY NO. 20:**

Please state whether you have submitted any claim(s), participated as a supporting witness for any claim(s), and/or been the subject of or participated as a witness in the audit of any claim(s), for compensation related to the Deepwater Horizon Incident. If you have, please identify the claimant(s), type(s) of claim(s), the determination(s) as to compensability, and the amount(s) received or expected to be received as payment for such claim(s), and the attorney(s) who represented you or the claimant(s) in connection with such claim(s).

**INTERROGATORY NO. 21:**

Please state whether you have ever been a member of any military branch of the United States Government or a state government, including but not limited to the Army, Navy, Air Force, Marines, Coast Guard, National Guard, or any reserve unit thereof; please describe your service,

including the military branch of which you were a member, your serial number, the beginning and ending dates of your military service, each job title and rank you held while in the military and the dates you held that title and rank, training locations, and a description of your work responsibilities and work locations while in the military.

**INTERROGATORY NO. 22:**

Please identify each and every fact witness from whom plaintiff intends to offer testimony at the trial of this matter and provide a summary of their anticipated testimony including any specific work site, employer, training, damage category, exposure, and/or other matter about which the witness will testify.

**INTERROGATORY NO. 23:**

Please state whether you were asked to participate in any studies regarding any purported health effects on humans of the Deepwater Horizon Incident; whether you agreed or declined to participate in any such studies; whether you volunteered to participate in any such studies without being asked; whether you in fact participated in any such studies; whether you received any materials in the mail, by email, or otherwise about any such studies and whether you still have such materials in your possession, custody, or control; the name, sponsor, protocol, date, and other identifying information regarding any such studies in which you were asked to and/or did in fact participate; and why you did or did not participate in any such studies.

**INTERROGATORY NO. 24:**

Please state whether there was health or medical monitoring available to you during your work in response to the Deepwater Horizon Incident. If so, please identify the individual(s) or entit(ies) (including BP) providing such monitoring services; the location of the clinic(s) or facilit(ies) where such monitoring was available to you; whether you in fact received such

monitoring services from the individual(s) or entit(ies) you identified; and if so, the individual(s) or entit(ies) who made such monitoring services available to you, the healthcare provider(s) who provided such services to you, the location(s) where you received such services, the date(s) on which you received such services, the medical condition(s) being monitored, the nature of the services received (e.g., physical examination, imaging studies, treatments or medications prescribed, etc.), any diagnos(es) made when such services were provided, and any documents memorializing such services.

**INTERROGATORY NO. 25:**

Please state whether there was any environmental monitoring by any individuals or entities (including BP) of the area in which you worked (whether at sea or on land) during your work in response to the Deepwater Horizon Incident. If so, please identify the individual(s) or entit(ies) providing such monitoring services; the locations of the facilit(ies) where such monitoring was performed; the nature of the monitoring services performed there (e.g., air, water, or food quality testing) and how any related testing was performed; and any actions taken as a result of any such testing (e.g., the promulgation of water quality advisories or a ban on fishing/shrimping in the area).

**REQUESTS FOR PRODUCTION OF DOCUMENTS**

**REQUEST FOR PRODUCTION NO. 1:**

Please produce a copy of your driver's license (front and back) and any other licenses or forms of identification issued to you by the State of Louisiana, any other state(s), the United States Coast Guard, or any other governmental bodies or agencies.

**REQUEST FOR PRODUCTION NO. 2:**

Please produce all documents received by you as a result of your job or safety training, orientation, or instruction related to your work in response to the Deepwater Horizon Incident.

**REQUEST FOR PRODUCTION NO. 3:**

Please produce all documents reflecting that you used or were exposed to the substance(s) alleged to have caused the illness described in your Complaint, including any documents related to the place, date, level, and duration of the use or exposure.

**REQUEST FOR PRODUCTION NO. 4:**

Please produce all documents describing, documenting, or otherwise related to your daily activities or the work you performed during the time you contend you were exposed to the substance(s) alleged to have caused your illness.

**REQUEST FOR PRODUCTION NO. 5:**

Please produce any and all documents which you contend identify the substance(s) alleged to have caused the illness described in your Complaint.

**REQUEST FOR PRODUCTION NO. 6:**

Please produce each and every document or other tangible materials which you have relied upon or will rely upon to allege, support, or reflect that you were exposed in any manner to the substance(s) alleged to have caused the illness described in your Complaint.

**REQUEST FOR PRODUCTION NO. 7:**

Please provide copies of any and all documents, charts, graphs, or other tangible items, which you intend to use in any manner at the trial of this case, regardless of whether or not the document or item will be introduced as an exhibit.

**REQUEST FOR PRODUCTION NO. 8:**

Please produce a copy of all statements, affidavits, reports, depositions, and audio, video, or written recordings obtained by or for you relating to the circumstances of your alleged exposures, sickness, illness or injury or in any way relating to the subject matter or claims involved in any Deepwater Horizon Incident litigation.

**REQUEST FOR PRODUCTION NO. 9:**

Please produce all documents and/or tangible things that support your contention that you allegedly worked on or around premises or vessels used as part of the Deepwater Horizon Incident response, including but not limited to a list identifying those premises and vessels, dates of work, and job description for your work.

**REQUEST FOR PRODUCTION NO. 10:**

Please produce any and all documents identifying or otherwise relating to any co-worker or other witness who claims to have observed you working with or around, or otherwise coming into proximity with, the substance(s) alleged to have caused the illness described in your Complaint.

**REQUEST FOR PRODUCTION NO. 11:**

Please produce all documents regarding the identification, composition, labeling and warnings, manufacture, use or application, marketing and/or distribution of the substance(s) alleged to have caused the illness described in your Complaint.

**REQUEST FOR PRODUCTION NO. 12:**

Please produce all photographs, drawings, diagrams, films, videos, and graphic depictions that in any way relate to the incident or the events, exposures, or circumstances of your alleged injury or illness, including pictures of you and/or your injuries, the premise(s), vessel(s), condition(s), chemical(s), product(s), substance(s), material(s), thing(s) and/or person(s) that relate to your claim in any way.

**REQUEST FOR PRODUCTION NO. 13:**

Please produce all personnel records, employment records, and/or union records, for each and every employer for which you have worked or performed services (whether directly or on a contract basis).

**REQUEST FOR PRODUCTION NO. 14:**

Please produce a copy of all medical and/or health insurance claims filed by or on your behalf.

**REQUEST FOR PRODUCTION NO. 15:**

Please produce a copy of any documents obtained during the past twenty (20) years concerning any of your medical/health problems, medical appointments, and/or health insurance, including but not limited to: all reports, correspondence and records from any medical provider who has examined the plaintiff and from any medical facility where the plaintiff has been treated

either as an inpatient or as an outpatient; all chest radiographs, tomographic films, computerized tomographic (C.T.) films, gallium or other radiosopic tracing films, perfusion and ventilation scans, nuclear magnetic resonance (N.M.R.) or Magnetic Resonance Imaging (M.R.I) films, or any other record of any diagnostic imaging modality including the digital files that encode the imaging done in any radiologic examination involving plaintiff; all radiologists' or other physicians' reports of any diagnostic radiologic procedure performed on plaintiff; all pulmonary function test results and data on the plaintiff, including, but not limited to, all measurements of diffusion capacity, arterial blood gases, lung compliance, lung volumes, expiratory and inspiratory lung airflow rates, and the flow volume loops or tracing related to any such data; all interpretive reports on pulmonary function data; and any and all additional laboratory or diagnostic tests and the reports interpreting the results of those tests.

**REQUEST FOR PRODUCTION NO. 16:**

Please produce all applications prepared and/or submitted by or on behalf of you for life insurance, medical care insurance, health and accident insurance, and/or disability insurance.

**REQUEST FOR PRODUCTION NO. 17:**

Please produce any documents relating to any previous or pending lawsuit, claim, or demand ever made by the plaintiff for damages, compensation of other benefits allegedly resulting from any illness or injury, including but not limited to: workers' compensation, disability benefits (including Social Security Disability), federal or state unemployment compensation claim records, disability insurance claim records, pension claim records, and any other health or accident insurance claim records, or suit.



**REQUEST FOR PRODUCTION NO. 18:**

Please produce all documents, bills, invoices, contracts, receipts, and payment records substantiating, evidencing, referring to, or related in any way to the damages, losses, and expenses you claim in this matter including, but not limited to, those relating to lost wages and medical expenses.

**REQUEST FOR PRODUCTION NO. 19:**

Please produce all documents identifying and substantiating all sources and amounts of annual income over the last 10 years, including but not limited to: plaintiff's federal, state, and local income tax records for the last five years as well as any other documents upon which the plaintiff relies in support of his claim. If loss of earnings or of earning capacity is alleged or claimed to have occurred before the current year, include copies of the income tax records for the five years prior to the claimed loss and up to the current tax year.

**REQUEST FOR PRODUCTION NO. 20:**

Please produce all documents, including but not limited to any report, prepared by any expert on your behalf, the curriculum vitae of each expert, and all documents relied upon by the expert in rendering such opinions, as well as copies of all articles authored by any such experts.

**REQUEST FOR PRODUCTION NO. 21:**

Please produce all reports, documents, physical models, photographs, graphic depictions, compilation of data, factual observations, opinions, tests, supporting data, calculations, and other material prepared by or for each expert in anticipation of such expert's trial or deposition testimony and any such materials prepared by an expert used for consultation whose work product or opinions have been reviewed, either in whole or part, by an expert who is to be called as a witness, either in

person or by deposition. If such have not been recorded and reduced to tangible form, please direct that such be done, and produce such.

**REQUEST FOR PRODUCTION NO. 22:**

Please produce all settlement agreements, documents, and correspondence relating to settlement agreements which have been entered into by you arising out of the Deepwater Horizon Incident and/or the alleged illnesses or injury made the basis of this lawsuit.

**REQUEST FOR PRODUCTION NO. 23:**

If you have agreed to indemnify, reimburse, pay, or provide any credit, allowance, offset, benefit, or consideration to any person or concern with reference to the prosecution or outcome of this lawsuit, please provide the complete contents, terms, and conditions of each such agreement.

**REQUEST FOR PRODUCTION NO. 24:**

Please produce all documents you have received in response to a subpoena or release/authorization in this litigation.

**REQUEST FOR PRODUCTION NO. 25:**

Please produce all documents you produced to any other party or third party in connection with the above-captioned proceeding or related proceedings involving similar circumstances filed in this or any other state.

**REQUEST FOR PRODUCTION NO. 26:**

Please produce a copy of any and all trial, deposition, or other sworn testimony given by you at any time in the past.

**REQUEST FOR PRODUCTION NO. 27:**

Please produce all non-privileged documents regarding any prior lawsuits and/or claims in any jurisdiction: (1) filed or asserted by you or on your behalf and/or (2) for which you served and/or have been identified as a witness.

**REQUEST FOR PRODUCTION NO. 28:**

Please produce all non-privileged documents regarding any audits associated with or related to any lawsuits and/or claims in any jurisdiction.

**REQUEST FOR PRODUCTION NO. 29:**

Regarding any prior injuries you sustained, state or federal lawsuits filed or asserted on your behalf, state or Longshore compensation claims, or any other personal injury claims filed or asserted on your behalf, please produce the following: (1) all economic and vocational expert reports prepared on your behalf; (2) all release and settlement documents of non-employer claims; and (3) all petitions, motions, and orders regarding settlements of state or federal worker's compensation claims, including settlements pursuant to 33 U.S.C. §908(i).

**REQUEST FOR PRODUCTION NO. 30:**

Please produce all insurance policies, including but not limited to medical and disability policies, and their respective fact sheets covering you during the period the injury was allegedly sustained by you for the past ten (10) years prior to the date of this Request.

**REQUEST FOR PRODUCTION NO. 31:**

Please produce all documents reflecting any insurance carrier's claim of subrogation to your recovery in this lawsuit.

**REQUEST FOR PRODUCTION NO. 32:**

Please produce copies of all documents that you identified, referred to, reviewed, or relied upon in responding to the above Interrogatories.

**REQUEST FOR PRODUCTION NO. 33:**

Please provide the following properly executed authorizations for Plaintiff:

- (a) Authorization to Disclose Information to the Social Security Administration;
- (b) Request for Social Security Earnings Information;
- (c) Social Security Administration Consent for Release of Information;
- (d) Authorization for Request for Copy of Federal Tax Return and Request for Transcript of Federal Tax Return;
- (e) 1-800-MEDICARE Authorization to Disclose Personal Health Information;
- (f) Authorization for Release of Records Provided to *Deepwater Horizon* Medical Benefits Claims Administrator per BELO CMO;
- (g) Supplemental Release of Records Provided to *Deepwater Horizon* Medical Benefits Claims Administrator;
- (h) Authorization for Release of Records Provided to *Deepwater Horizon* Economic and/or Property Claims Administrator;
- (i) Authorization and Direction for Disclosure and Release of Employee/Personnel Records;
- (j) Authorization for the Use/Disclosure of Protected Health Information;
- (k) Authorization for Release of Psychotherapy Notes;
- (l) Authorization and Direction for Disclosure and Releases of Veterans Affairs Information and Military Records;
- (m) Authorization and Direction for Disclosure and Release of Educational/Training Records;
- (n) Authorization to Obtain Union, Trade, Skill and/or Professional Organization Membership Documents & Records;

- (o) Authorization and Direction for Disclosure and Release of Medicaid, Medicare, Medical Insurance, and Disability Insurance Benefits Information;
- (p) Authorization for the Release of Criminal Records;
- (q) Authorization for Release Health Information and Request Pertaining to Military Records;
- (r) Authorization and Direction for Disclosure and Release of Asbestos Personal Injury Trust Records;
- (s) Authorization for Release of Payroll and Personnel Records;
- (t) Authorization for Release of Worker's Compensation Records;
- (u) Authorization for Release of Unemployment Compensation Benefits Records;
- (v) Authorization for Release of Driving / Motor Vehicle Records; and
- (w) Authorization for Release of Government Assistance / Welfare Benefits Records.
- (x) Authorization for Release of Gulf Coast Claims Facility Records.

**REQUEST FOR PRODUCTION NO. 34:**

If you have submitted any other claim(s) for compensation related to the Deepwater Horizon Incident, please produce copies of all documents related to such claim(s).

**REQUEST FOR PRODUCTION NO. 35:**

Please produce a document log for any documents withheld from production on account of any claim of privilege or protection from production whatsoever.

**REQUEST FOR PRODUCTION NO. 36:**

Please produce a copy of any and all requests to any federal, state, local, municipal, or other government agency, office, department, or administrative entity pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and/or any comparable federal, state, or local authority in connection with this litigation and any correspondence with the federal, state, local, municipal,

or other governmental agency, office, department, or administrative entity relating to such a request.

**REQUEST FOR PRODUCTION NO. 37:**

Please produce a copy of any and all documents received by you in connection with any request to any federal, state, local, municipal, or other governmental agency, office, department, or administrative entity pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. § 552, and/or any comparable federal, state, or local authority in connection with this litigation.

**REQUEST FOR PRODUCTION NO. 38:**

Please produce any and all contracts, documents, data, and/or information relating to the compensation of any witness and/or medical personnel involved with your claim including, but not limited to, any compensation on a contingency basis.

**REQUEST FOR PRODUCTION NO. 39:**

Please produce any and all documents, data, and/or information including, but not limited to, invoices, receipts, payments, agreements or charges relating to the medical interview, examination, diagnosis, and/or treatment of the conditions alleged in your Complaint.

**REQUEST FOR PRODUCTION NO. 40:**

Please produce all documents and other materials submitted to or received from the Deepwater Horizon Medical Benefits Claims Administrator, including your Proof of Claim Form, as part of your participation in the Medical Benefits Class Action Settlement.

Respectfully submitted,

s/ Brady C. McMillin

Charles B. Wilmore (Bar #28812)

R. Keith Jarrett (Bar #16984)

Devin C. Reid (Bar #32645)

Elizabeth S. Wheeler (#21148)

Randy J. Marse (Bar #34662)

Brady C. McMillin (Bar #38346)

LISKOW & LEWIS

701 Poydras Street, Suite 5000

New Orleans, LA 70139

Telephone: (504) 581-7979

Telefax: (504) 556-4108

*Attorneys for BP Exploration &  
Production Inc. and BP America  
Production Company*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a copy of the above and foregoing pleading has been served upon plaintiff's counsel of record on June 30, 2020 by electronic mail, facsimile or United States mail, properly addressed and postage prepaid, and all other known counsel of record via electronic mail, facsimile or United States mail, properly addressed and postage prepaid.

s/ Brady C. McMillin