

Donald C. Thomas  
 Howard A. Lazar  
 Delaney Wiles, Inc.  
 1007 W. 3<sup>rd</sup> Ave., Ste. 400  
 Anchorage, AK 99501  
 Phone: (907)279-3581  
 Fax: (907)277-1331  
 Email: [dct@delaneywiles.com](mailto:dct@delaneywiles.com)  
[hal@delaneywiles.com](mailto:hal@delaneywiles.com)

Attorneys for General Dynamics Land Systems Inc.  
 General Dynamics Land Systems Customer  
 Service & Support Co.

UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF ALASKA

DAYLE JAMES, as Personal )  
 Representative of the ESTATE )  
 OF CHARLIE THOMAS JAMES, JR., )  
 )  
 Plaintiff, )

v. )

GENERAL DYNAMICS CORPORATION; )  
 GENERAL DYNAMICS LAND SYSTEMS )  
 INC.; GENERAL DYNAMICS LAND )  
 SYSTEMS CUSTOMER SERVICE & )  
 SUPPORT CO.; TOTE INC.; TOTE )  
 MARITIME ALASKA INC.; ABC )  
 ENTITY; ABC CORP.; JOHN DOES )  
 1-4, )

Defendants. )

Case No. 3:17-cv-00046-JWS

**GENERAL DYNAMICS DEFENDANTS' SUPPLEMENTAL RESPONSE  
 TO REQUEST FOR PRODUCTION IN  
 PLAINTIFF'S FIRST DISCOVERY REQUESTS TO ALL DEFENDANTS**

Defendants General Dynamics Land Systems Inc. and General

DELANEY WILES, INC.  
 SUITE 400  
 1007 WEST 3<sup>rd</sup> AVENUE  
 ANCHORAGE, ALASKA  
 99501  
 (907) 279-3581  
 FAX (907) 277-1331

Dynamics Land Systems Customer Service & Support Co. (collectively herein "GDLS") hereby supplement their 23 June 2017 response to the request for production in Plaintiff's First Discovery Requests to All Defendants, dated 24 May 2017, as follows:

**REQUEST FOR PRODUCTION NO. 1:** Please produce copies any and all reports, memoranda, statements, recordings, photos, videos, electronic data, or any other similar items, which were created as a result of any inspection, investigation, written or recorded statements, photos, videos or similar efforts expended regarding the death of Plaintiff's decedent, the brake failure that was blamed for his death, or the causes and circumstances that led up to his death.

**SUPPLEMENTAL RESPONSE:** Defendants GDLS hereby incorporate by reference all objections stated in their 23 June 2017 response to this request. Without waiver of any objection, see attached additional doc. nos.:

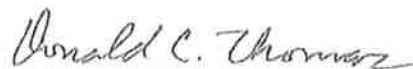
D10-000396 - Notes taken by Brandon Taylor identifying some of the attendees at the initial inspection of the subject Stryker here in Anchorage sometime shortly after the accident.

DELANEY WILES, INC  
SUITE 400  
1007 WEST 34<sup>th</sup> AVENUE  
ANCHORAGE ALASKA  
99501  
(907) 279 3661  
FAX (907) 277 1331

James v. General Dynamics Corp., et al. Case No. 3:17-cv-00046-JWS  
GEN DYN DEFS' 1<sup>ST</sup> SUPP. RESP TO RFE IN PL'S 1<sup>ST</sup> DISCO REQ TO ALL DEFS Page 2 of 3

DATED this 11<sup>th</sup> day of July, 2017, at Anchorage, Alaska.

DELANEY WILES, INC.  
Attorneys for General Dynamics  
Defendants



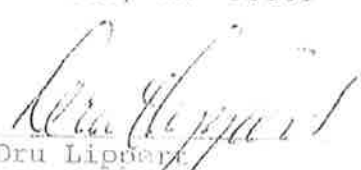
Donald C. Thomas  
1007 W. 3<sup>rd</sup> Ave., Ste. 400  
Anchorage, AK 99501  
Phone: (907)279-3581  
Fax: (907)277-1331  
Email: [hal@delaneywiles.com](mailto:hal@delaneywiles.com)  
Alaska Bar Assoc. No. 8604013

**CERTIFICATE OF SERVICE**

This certifies that I am an authorized agent of Delaney Wiles, Inc., for service of papers, and that on this 11<sup>th</sup> day of July, 2017, a copy of the foregoing document was served upon:

Michael W. Flanigan (via hand delivery)  
Flanigan & Bataille  
1007 W. 3<sup>rd</sup> Ave., Ste. 206  
Anchorage, AK 99501

Barbara L. Holland (via mail)  
Tyler W. Arnold  
Carvey Schubert Barer  
1191 Second Ave., Ste. 1800  
Seattle, WA 98101

  
Dru Lippert  
4828-0410-6311, s. 1

DELANEY WILES, INC.  
SUITE 400  
1007 WEST 3<sup>RD</sup> AVENUE  
ANCHORAGE, ALASKA  
99501  
(907) 279-3581  
FAX (907) 277-1331

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GEORGE L. FLY  
TOTE  
907 265 7233

MATTHEW PAULI  
OSHA  
907 291 3535

COL ANDERSON  
USARAK G4  
907 384 7077

**SHAWN P. RAY PE, ACTRR, ASE, CFET, CVFI**  
CHIEF MECHANICAL ENGINEER  
ACCIDENT RECONSTRUCTIONIST  
SRAY@CASE4N6.COM  
C 503.310.1975  
P 503.736.1106x27  
F 503.736.1051  
T 877.736.1106



4636 N. WILLIAMS AVENUE  
PORTLAND, OR 97217-2828  
WWW.CASE4N6.COM



United States Army Alaska

**Lavonne D. Taylor**  
Paralegal

Office of the Staff Judge Advocate  
724 Postal Service Loop #5700  
Fort Richardson, AK 99505-5700

(907) 384-0330  
DSN 317-384-0330  
Fax (907) 384-7521

D10-000396

James v. General Dynamics