

IN THE CIRCUIT COURT OF THE FIFTH JUDICIAL CIRCUIT,
IN AND FOR LAKE COUNTY, FLORIDA

ELISA F. DILL, individually, CHRISTI D.
THOMAS, individually, LORITTA D.
FINCH, individually, RACHEL RIGGS, CASE NO: 35-2023-CA-001348-AXXX-XX
individually, and MARK DILL, individually,

Plaintiffs,

v.

PANNU BROS TRUCKING, INC., a Foreign
For Profit Corporation, and RAJVIR SINGH
BAGHRI, an individual,

Defendants.

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**PLAINTIFF ELISA F. DILL'S SECOND REQUEST FOR
PRODUCTION TO DEFENDANT PANNU BROS TRUCKING, INC.**

Plaintiff, ELISA F. DILL, by and through the undersigned attorney and pursuant to Florida Rule of Civil Procedure 1.350, hereby propounds this Second Request for Production of Documents to Defendant PANNU BROS TRUCKING, INC. ("PANNU BROS"). The documents requested are to be produced to the undersigned within thirty (30) days of service of this Request, or at such other reasonable time, date, and place as may be mutually agreed upon by the parties.

PRELIMINARY NOTES ABOUT DISCOVERY

Plaintiff requests that Defendant respond to these and all future discovery requests by producing the requested information and documents separately identified according to request number and identifying the documents produced by stating which numbered request they respond to. Plaintiff requests that Defendant not produce unidentified documents via letters that state essentially nothing more than “here are some more responsive documents”.

Plaintiff also requests that Defendant take the time to accumulate all information that is called for by this discovery request, whether it be facts or documents, and to provide all such information in its initial written discovery responses. If the time provided by law to respond to this written discovery is insufficient, Plaintiff will extend the time, provided the extension requested is not excessive.

INSTRUCTIONS AND DEFINITIONS

- A. Each request seeks information available to PANNU BROS and all persons acting on its behalf. Accordingly, as used herein, the terms “Defendant”, “you” and “your” refer without limitation to PANNU BROS, PANNU BRO’s attorneys, agents and anyone who, at the relevant time, was acting or purporting to act for it or in PANNU BRO’s behalf.
- B. “Plaintiff” means the Plaintiff ELISA F. DILL, and includes her agents, representatives, attorneys, and anyone who, at the relevant times, was acting or purporting to act for her behalf.
- C. The terms “Driver” and “Defendant Driver” refer to Defendant RAJVIR SINGH BAGHRI.
- D. The term “Carrier” refers to Defendant PANNU BROS.
- E. As used herein, the term "relating to" includes relating in any way or pertaining to, referring to or having as its subject matter, directly or indirectly, expressly or impliedly, the subject matter of the specified request.
- F. The term “including” shall mean including, but not limited to, and shall be interpreted as broadly as possible. Any specifically listed items to be included in the request shall not be an exclusive list and shall not be interpreted to limit the breadth of the request.
- G. “Identify” or “describe” or “description”:
 - 1) when used in referring to a person, means to state his or her full name, present and last known residence and business addresses, all known telephone numbers, cellular phone numbers, and email addresses, employer, and title or position;

- 2) when used in referring to an entity means to state its official name, its organizational form, and all known addresses;
 - 3) when used in referring to a document, means to describe the type and nature of the document, the date, title, its present location, the name and address of its custodian, the substance of its contents (except that in lieu of stating the substance of the contents of any document, you may attach a complete copy of the document to your answers to these requests), the label name or description of each file where the original or a copy of the document is kept or located, and any file number or numbers used in connection with it; author, addressee(s),
 - 4) when used in referring to a discussion or communication, means to state the medium of the discussion or communication (e.g., telephone conversation, letter, telegram, telecopy, written memorandum, face-to-face communication, etc.), the date of the discussion or communication, or the dates on which the communication was sent and received if the dates are not the same, the substance of the discussion or communication, the identity of each individual involved or participating in the discussion or communication, the identity of the person who initiated the discussion or communication, the identity of all persons present and/or witnesses to said discussion or communication, the identity of any documents embodying or summarizing the communication or in any way related to it, and the identity of the custodian of each such document regarding the communication;
 - 5) when used in referring to an event, means to describe in detail all actions or conduct and all communications and discussions comprising the event, including a statement of what occurred, the date or dates on which the occurrence took place, the identity of all persons and individuals who participated, the identity of all persons and individuals who witnessed or were present, but not participating, and a description of all documents relating to the event, including particularly, documents summarizing, describing or characterizing the event.
- H. The terms “documents” and “records” as used herein shall mean any and every written, printed, typed, electronic or other media of any kind or nature relating to the subject matter of the request; and shall include all computerized information, any and all e-mails, all copies of documents by whatever means made, all papers, letters, correspondence, faxes, spreadsheets, telegrams, statements, affidavits, inter-office communications, memoranda, stenographic or handwritten notes, notations, notebooks, reports, checks, canceled checks, bank statements, receipts, invoices, bills of lading, log books, toll receipts, delivery receipts, fuel receipts, D.O.T. citations, weigh station receipts, calendars, schedules, diagrams, studies, publications, books, pamphlets, pictures, drawings and schematics of every type, films, videos, audio recordings, maps, surveys, minutes, telexes, contracts, memoranda of agreement, diaries, graphs, charts, income tax

forms, other forms, microfilms, microfiche, computations, data processing cards, computer tapes and printouts, and any other form of electronic media, and things similar to any of the foregoing; and every copy of such document whenever the original is not in your possession, custody or control. The term includes any markings, comments or notations of any character not a part original document or photographic reproduction thereof, such as initials, stamps, date stamps, edits, post-it notes, high-lighting, etc. Any such markings on the front, back or margins shall not be redacted and shall be part of the legible copies produced. Any markings are to be identified or produced and, if necessary, identified as a separate document.

- I. As used herein, the “date” shall mean the exact day, month and year, as ascertainable, or, if not, the best approximation (including relationship to other events).
- J. The term “Crash” means the crash that gives rise to this suit, which occurred on or about December 3, 2022, in Lake County, Florida.
- K. The term “Truck” refers to the 2018 Freightliner Cascadia tractor bearing VIN # 3AKJHHDR8JSJX8658 and the 2015 Utility trailer bearing VIN # 1UYVS2530FU263557 involved in this crash.
- L. As used herein, the “relevant time period” means from 365 days before the Crash through 120 days after the Crash. Unless a different time frame is specified, respond to each request for the relevant time period.
- M. The term “government agency” shall mean any and all federal, state or municipal agency, bureau, department, administration, etc. including any state or federal department of transportation, any investigating officer, the Federal Highway Safety Administration, the Federal Motor Carrier Safety Administration, the Environmental Protection Agency, and any law enforcement agency.
- N. The term “Transportation Cycle” refers to the series of steps involved in moving goods from one location to another.
- O. The term “Load” the term "load" refers to the cargo or freight being transported by the Truck and Trailer and represents the goods, materials, or items that are loaded onto the trailer portion of the tractor-trailer for transportation from one location to another.
- P. The term “electronic device” shall mean any and all electronic technology, software, devices or systems in or on the tractor, trailer(s) or cargo including: communication

devices (e.g., cellular telephones, satellite telephones, all Bluetooth devices, tablets, iPads, Kindle, Android electronics, mobile hot-spot, mobile gateway, wifi device, computers, laptops, PDAs, etc.); G.P.S., R.F.I.D., or other tracking devices; telematics devices; route planning devices; fleet management devices; fleet tracking devices; cargo monitoring systems; safety monitoring devices (e.g., hard stops, acceleration and deceleration, collisions; lane change, drive cams, etc.); driver monitoring devices or cameras; on board systems; any onboard cameras or video devices (e.g., dash cams, go pro's, back-up cameras, etc.); audio recording devices; all in-cab display monitors; engine control modules; event data recorders; airbag control modules; brake control modules; electronic on-board recorders; any intelligent vehicle automated vehicle or connected vehicle technology; all maintenance related systems (e.g., remote diagnostic systems, fault code monitoring system, prognostic systems, etc.); any sensors that capture and transmit data; any third party electronics, devices, software or systems of any kind (e.g., VORAD, Qualcomm, TransCore, SkyBitz, Fluensee, Fleetilla, Teletrac, Lat-Lon, Telogis, GeoLogic, Cheetah, Xata, PeopleNet, Cadec, Vnomics, Virtual Technician, OEM Diagnostic System, Trackpoint, Sense-Aware, Lytx, DriveCam, Rair, Omnitrac, Zonar, Guard Dog Connect, On Command Connection, Virtual Technician, etc.) or any similar system; any driver safety, compliance, or hours of service logging or monitoring systems; any transponders or tachographs; any bar code or toll pass systems; any entertainment or gaming systems (e.g., televisions, hand held electronic games, Playstation, Xbox, Wii, etc.); any other tracking system, logging unit, trip monitor, trip recorder, satellite systems, cellular systems, etc., and all other third party systems, electronics or other devices not described above that were present in or on the tractor, trailer(s) or cargo at the time of the Crash, whether factory installed, after market, mounted or removable and whether or not it was working or recording. This would include any Apps on any electronic device in or on the tractor, trailer(s) or cargo (e.g., Transflo Mobile, BigRoad Free Truck Driver Log Book, Drivers Daily Log, Fuelbook, Drive Axle, Trucker Logbook, UShip, Dispatcher, ABF Mobile, TransFlo, CDL Warrior – Trucker Tools, Werner, Weigh My Truck, etc.).

- Q. In the event that the attorney/client privilege, work product privilege, or any other claim of privilege is asserted with respect to any document that is herein requested or a notation

on or related to that document, then as to each allegedly privileged document or marking, you are required to supply the following information in your response or in a separate privilege log:

- 1) Describe the nature of the document (e.g., letter, memorandum, notation, etc.);
- 2) State the date(s) listed on the document;
- 3) Identify the persons who sent and received the original and/or any copy(ies) of the document;
- 4) Identify the custodian of the document;
- 5) Describe the subject matter of the document;
- 6) State the basis for the assertion of such privilege upon which you contend you are entitled to withhold the document from production;
- 7) Identify the author of each such document;
- 8) Describe the present location of any and all printed, handwritten or electronic copies of each said document; and
- 9) Describe the label name or description of each file where the original or copy of the document is kept or located and any file number or numbers used in connection with it.

REQUESTS

COMPANY BASICS

1. An organizational chart of your company at the time the Driver was hired, at the time of the Crash and today.
2. An organizational chart showing the relationship between all PANNU BROS entities and any named defendant in this case.
3. A list of all subsidiary, related, parent, wholly or partially owned entities of any named defendant in this case.

COMPANY OPERATIONS

4. A copy of each document retention policy in effect for you at the time of the Crash and now.
5. All manuals, videos, books or other similar documents used to train your commercial motor vehicle drivers for two years prior to the date of the Crash and through today.
6. All documents and materials relating to your maintenance annual inspections policies and reports for the relevant time period.
7. All documents and materials relating to your maintenance policy and procedures for the relevant time period.

8. A copy of all your power point or other sales presentations or promotional fliers from five years before the Crash to today.
9. All company newsletters distributed during the time period beginning two years before the Crash to present.
10. Transcripts or recordings of all depositions, trial testimony or other sworn testimony of corporate designees for you given in the past five years for any reason and in the past ten (10) years in any case where it was alleged that a driver or other employee or agent working for you caused injury or death to another person.

TRANSPORTATION CYCLE

11. Dispatch records (written or electronic) indicating assignment of the Truck to the Defendant Driver and his instructions to pickup and deliver any cargo, the dates and times of pickup and delivery and any other factors related to deliveries made or to be made on the day of this Crash.
12. Any driver call-in records or other written or electronic records indicating communications between any defendant and the driver on the day of the Crash, including any reference to the movement of the Truck, the cargo, the equipment and/or the Driver on the day of this Crash.
13. All blanket or specific permits applicable to the load being transported at the time of the Crash, the Defendant Driver, or the Truck or other transportation equipment being used at the time of the Crash.
14. Any and all documents not otherwise produced relating to or identifying each and every person or entity involved in any aspect of planning, logistics, negotiations, routing, scheduling, loading, unloading or delivering the load or cargo being transported in the Truck at the time of the Crash for the transportation cycle.
15. Any and all documents not otherwise produced relating to the entire transportation cycle for all cargo on the Truck at the time of the Crash, including from purchase of the items to delivery to the end consumers that were to receive the deliveries, including motor carriers, drivers, brokers, logistics companies, and all other persons or entities involved.
16. Any and all documents not otherwise produced relating to all payments, consideration and monies owed, paid or received for any aspect of the entire transportation cycle for all cargo on the Truck at the time of the Crash.
17. Any and all documents not otherwise produced relating to the delivery or receipt of the materials or goods hauled by the Defendant Driver on the date of the Crash.

DRIVER QUALIFICATION AND RETENTION

18. Any documents regarding the Defendant Driver's employment or agency with you or any

other defendant covering the time period from the date when the Defendant Driver first became employed or contracted, up until the date of your response to this request, specifically including the Crash date.

19. Any documents relating to any lease agreements or contracts between you or any other defendant and the Defendant Driver pertaining to the Truck.
20. If applicable, all forms completed by either you or the Defendant Driver that were submitted to any government agency concerning any crashes involving the Defendant Driver during the period of the Defendant Driver's employment with you or any other defendant.
21. The entire contents of all files relating to the Defendant Driver not otherwise produced, including personnel, payroll, discipline, or any other files.

TRUCK, TRAILER & EQUIPMENT

22. The complete maintenance files, records and invoices on the Truck, and all other transportation equipment involved in the Crash, including any inspections, repairs or maintenance, as well as daily condition reports from two years prior to the Crash through the time of the return of the Truck to service following the Crash.
23. A copy of the title, registration and any other ownership documents for the Truck and other transportation equipment involved in the Crash.
24. Any document that relates to the make, model, features, accessories, year and identification number(s) of the Truck and other transportation equipment involved in the Crash.
25. Any documents relating to all persons, corporations or entities who were registered title owners and/or had ownership interest or right to control the Truck and other transportation equipment involved in the Crash, or the nature of their ownership interest or right to control it.
26. All records, receipts, advertising, promotional materials, manuals, installation records, and any other documents relating to any aftermarket improvements or alterations to the tractor or trailer(s) at any time.
27. All records, receipts, advertising, promotional materials, manuals, options, installation records, reports from, and any other documents relating to any electronic device or communications device in or on the tractor, trailer, transportation equipment or cargo at the time of the Crash.
28. All records, receipts, advertising, promotional materials, manuals, options, installation records, reports from, and any other documents relating to any factory options or settings for OEM equipment on the Truck, transportation equipment or cargo at the time of the Crash.

29. The lease for the Truck in effect as of the date of the Crash.
30. The trip lease in effect as of the date of the Crash for the Truck.
31. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.3 during the relevant time period.
32. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.9 during the relevant time period.
33. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.11 during the relevant time period.
34. The fuel tax file for any tractor, truck or commercial motor vehicle the Defendant Driver drove for the six months before and the date of the Crash.
35. All documents or manuals that relate to the Gross Vehicle Weight Rating, or the Gross Combination Weight Rating, of the Truck and/or entire vehicle combination at the time of the Crash.
36. All documents that relate to the Gross Vehicle Weight or the Gross Combination Weight of the Truck and cargo at the time of the Crash.
37. All documents reflecting the manufacturer, model and identification number for the engine in the tractor involved in the Crash.
38. All materials, manuals, technical data, cost or other documents reflecting any safety measure on the Truck or equipment involved in the Crash, including any telematics, driver monitoring, collision avoidance, collision warning, lane deviation, tire monitoring, or any other safety measure.

Plaintiff would show in support of said request that the items herein enumerated are in the possession, custody, and control of Defendant and constitute or contain matters within the scope of rule 1.280(b), of the Florida Rules of Civil Procedure. Plaintiff needs the materials itemized herein in the preparation of this case, and Plaintiff is unable, without undue hardship, to obtain the substantial equivalent of said materials by other means.

THE TRUCK ACCIDENT LAW FIRM

/s/ Sara K. Sardina

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on November 7, 2024, a true and correct copy of the foregoing was served by electronic mail to all counsel of record.

/s/ Sara K. Sardina

Attorney