

IN THE CIRCUIT COURT OF THE  
5TH JUDICIAL CIRCUIT IN AND  
FOR LAKE COUNTY, FLORIDA

CASE NO.: 35-2023-CA-001348-AXXX-XX

ELISA F. DILL, Individually, CHRISTI D.  
THOMAS, Individually, LORITTA D. FINCH,  
Individually, RACHEL RIGGS, Individually,  
and MARK DILL, Individually,

Plaintiff(s),

v.

RAJVIR S. BAGHRI A/K/A RAJVIR SINGH  
BAGHRI, AND PANNU BROS TRUCKING,  
INC.,

Defendant(s).

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

COMES NOW DEFENDANT, PANNU BROS TRUCKING, INC., by and through the undersigned counsel and pursuant to Florida Rules of Civil Procedure 1.350, files its Response to Plaintiff's, ELISA F. DILL's, Second Request For Production Of Documents served on Defendant on August 29, 2024, as follows:

**COMPANY BASICS**

1. An organizational chart of your company at the time the Driver was hired, at the time of the Crash and today.

**RESPONSE: None within the custody, control, or possession of the Defendants.**

2. An organizational chart showing the relationship between all PANNU BROS entities and any named defendant in this case.

**RESPONSE: None within the custody, control, or possession of the Defendants.**

3. A list of all subsidiary, related, parent, wholly or partially owned entities of any named defendant in this case.

**RESPONSE: None.**

## **COMPANY OPERATIONS**

4. A copy of each document retention policy in effect for you at the time of the Crash and now.

**RESPONSE: None.**

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.

**RESPONSE: None.**

6. All documents and materials relating to your maintenance annual inspections policies and reports for the relevant time period.

**RESPONSE: Objection, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the stated objection, maintenance records have been produced.**

7. All documents and materials relating to your maintenance policy and procedures for the relevant time period.

**RESPONSE: Objection, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the stated objection, maintenance records have been produced.**

8. A copy of all your power point or other sales presentations or promotional fliers from five years before the Crash to today.

**RESPONSE: None.**

9. All company newsletters distributed during the time period beginning two years before the Crash to present.

**RESPONSE: None.**

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.

**RESPONSE: Objection, overly broad, vague, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.**

#### **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.

**RESPONSE: Dispatch records have previously been produced.**

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.

**RESPONSE: These documents have been requested and will be produced upon receipt if they exist.**

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.

**RESPONSE: These documents have been requested and will be produced upon receipt if they exist.**

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.

**RESPONSE: Objection, overly broad, vague, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.**

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.

**RESPONSE: All documents related to the transportation of cargo have previously been produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

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.

**RESPONSE: All documents related to the transportation of cargo have previously been produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

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.

**RESPONSE: All documents related to the delivery or receipt of the materials or goods hauled have previously been produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

## **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.

**RESPONSE: All employment documents related to the Defendant driver have previously been produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

19. Any documents relating to any lease agreements or contracts between you or any other defendant and the Defendant Driver pertaining to the Truck.

**RESPONSE: The equipment lease agreement has been previously produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

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.

**RESPONSE: None.**

21. The entire contents of all files relating to the Defendant Driver not otherwise produced, including personnel, payroll, discipline, or any other files.

**RESPONSE: All employment documents related to the Defendant driver have previously been produced. All other documents requested are not within the custody, control, or possession of the Defendant.**

## **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.

**RESPONSE: In addition to the records and invoices previously produced, please see attached. All other documents requested are not within the custody, control, or possession of the Defendant.**

23. A copy of the title, registration and any other ownership documents for the Truck and other transportation equipment involved in the Crash.

**RESPONSE: Please see attached.**

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.

**RESPONSE: Please see attached.**

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.

**RESPONSE: Please see attached.**

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.

**RESPONSE: None.**

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.

**RESPONSE: None.**

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.

**RESPONSE: None.**

29. The lease for the Truck in effect as of the date of the Crash.

**RESPONSE: None.**

30. The trip lease in effect as of the date of the Crash for the Truck.

**RESPONSE: Not applicable.**

31. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.3 during the relevant time period.

**RESPONSE: Objection, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the stated objection, in addition to the maintenance records previously produced, please see attached.**

32. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.9 during the relevant time period.

**RESPONSE: Objection, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the stated objection, the documents have been requested and will be produced upon receipt if they exist.**

33. Any and all records for the Truck generated pursuant to 49 C.F.R. §396.11 during the relevant time period.

**RESPONSE: Objection, overbroad, vague, and not reasonably calculated to lead to the discovery of admissible evidence. Without waiving the stated objection, the documents have been requested and will be produced upon receipt if they exist.**

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.

**RESPONSE: The documents have been requested and will be produced upon receipt if they exist.**

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.

**RESPONSE: None.**

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.

**RESPONSE: These documents have been previously produced.**

37. All documents reflecting the manufacturer, model and identification number for the engine in the tractor involved in the Crash.

**RESPONSE: None in Defendant's possession.**

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.

**RESPONSE: None in Defendant's possession.**

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.

**CERTIFICATE OF SERVICE**



WE HEREBY CERTIFY that a true and correct copy of the foregoing has been furnished via Electronic Mail, to all counsel of record on the attached Service List, this 9<sup>th</sup> day of December, 2024.

LUKS, SANTANIELLO, PETRILLO, COHEN &  
PETERFRIEND  
Attorneys for Defendants  
789 SW Federal Highway, Suite 101  
Stuart, FL 34994  
Telephone: 772-678-6080  
Facsimile: 772-678-6631

By: /s/ Benjamin S. Pahl  
Benjamin S. Pahl  
Florida Bar No.: 113709  
[BPahl@insurancedefense.net](mailto:BPahl@insurancedefense.net)

**SERVICE LIST**

Co-Counsel for Plaintiff

SARA K. SARDINA, ESQ.  
JOSEPH V. CAMERLENGO, B.C.S.  
The Truck Accident Law Firm  
1200 Riverplace Blvd, Suite 902  
Jacksonville, Florida 32207  
Telephone: (904) 306-9220  
Facsimile: (904) 306-9221  
[jvc@truckcrashlaw.com](mailto:jvc@truckcrashlaw.com)  
[sks@truckcrashlaw.com](mailto:sks@truckcrashlaw.com)  
[team@truckcrashlaw.com](mailto:team@truckcrashlaw.com)

and

KYLE J. BAGEN, ESQ.  
Steven A. Bagen & Associates, P.A.

6241 NW 23rd Street, Suite 300

Gainesville, Florida 32627

Telephone: (352) 377-9000

Facsimile: (352) 373-9000

[kyle@bagenlaw.com](mailto:kyle@bagenlaw.com)

[wendy@bagenlaw.com](mailto:wendy@bagenlaw.com)