

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
JACKSONVILLE DIVISION**

OTIS AND FIONA OLMAN,

Plaintiffs,

v.

Case No. 8-16-CV-00637

FULL MOON SPORTS, INC.
& BRUCE BELCHER,

Defendants.

**DEFENDANT'S ANSWERS AND OBJECTIONS
TO PLAINTIFF'S FIRST SET OF INTERROGATORIES**

As authorized by Federal Rule of Civil Procedure 33, Defendant Full Moon Sports, Inc. hereby responds to Plaintiff's First Set of Interrogatories as follows:

General Objections

[omitted]

Answers and Specific Objections

Interrogatory #1

Identify the person or persons who made the determination to promote Mr. Sid Shockley to manager of the Jacksonville store.

Response #1

Subject to the General Objections, Full Moon states that the ultimate decision to promote Mr. Shockley was made by Full Moon's Reorganization Committee.

Interrogatory #2

Identify the manager or managers of Full Moon's information systems, information management or computer department (or other similar department or organizational structure) for the period from January 2015 to the present.

Response #2

Subject to and incorporating the General Objections, Full Moon states that Mr. Noah Stephen held the position of Vice President of Information Management at Full Moon during the specified period.

Interrogatory #8

State the age of all managers of all Full Moon retail stores as of January 2015 and January 2016.

Response #8

Full Moon objects to Interrogatory #8 on the grounds that it is over broad and calls for information that is not relevant to the claim or defense of any party. Accordingly, Full Moon declines to answer.

Interrogatory #15

Identify all facts that support your contention that Otis Olman converted Full Moon's property as Full Moon has alleged in its counterclaim in this action.

Response #15

Full Moon objects to Interrogatory #15 as being premature. Further responding, Full Moon states that it will respond to Interrogatory #15 after it has had an opportunity to engage in discovery as contemplated by the Case Management Order in this case.

Interrogatory #22

Does Full Moon contend that Otis Olman was unqualified to continue serving as manager of the Jacksonville store at the time of his replacement? If your answer is yes, identify all facts that support this contention.

Response #22

Yes, Full Moon contends that Plaintiff Otis Olman was unqualified to continue serving as manager of the Jacksonville store at the time of his replacement. Full Moon objects to Interrogatory #22 as being premature to the extent it calls for an identification of "all facts that support this contention." Full Moon states that it will respond to Interrogatory #22 after it has had an opportunity to engage in discovery as contemplated by the Case Management order in this case.

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As to Objections,
Full Moon Sports, Inc.
By its attorneys

Harrison Ames, Esq.

Counsel for Full Moon Sports, Inc.
[Address, phone number, etc. omitted]

As to Answers:

Bertie Lurch
President, Full Moon Sports, Inc.

Before me personally appeared Bertie Lurch who swore under the penalties of perjury that the foregoing answers were true and accurate based on a review of the books and records of Full Moon Sports, Inc.

Thomas Alva
Notary Public, my commission expires: 12/10/2016

[Certificate of Service omitted]