

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
IN AND FOR DUVAL COUNTY, FLORIDA**

**DARLENE PEOPLES,**

**Plaintiff,**

**CASE NO.: 2017 CA 003340**

**CV-H**

**vs.**

**COMMUNITY REHABILITATION  
CENTER, INC., a Florida Not for  
Profit Corporation,**

**Defendant.**

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**PLAINTIFF'S MOTION TO COMPEL AND FOR SANCTIONS**

Plaintiff, DARLENE PEOPLES ("Plaintiff"), by and through her undersigned counsel, moves this court for an order to compel the Defendant, COMMUNITY REHABILITATION CENTER, INC. ("Defendant"), to adequately respond to discovery, and for sanctions, as follows:

1. On October 10, 2017, Plaintiff served Defendant with her First Set of Interrogatories and First Request for Production of Documents. See Plaintiff's First set of Interrogatories and First Request for Production attached hereto and incorporated herein as Composite Exhibit "A."

2. Pursuant to the Florida Rules of Civil Procedure 1.380, Defendant was required to produce the documents requested, object to the discovery requested, or otherwise respond to Plaintiff's aforementioned discovery no later than November 9, 2017. However, Defendant failed to do so.

3. After the deadline to response passed, on November 16, 2017, Plaintiff's counsel sent Defendant's Counsel correspondence requesting Defendant's outstanding discovery

responses. *See* Correspondence attached hereto and incorporated herein as Composite Exhibit “B.” In response, Defendant’s counsel requested an extension of time through November 27, 2017. *Id.* Plaintiff’s Counsel did not object to this request. *Id.*

4. Despite the enlargement of time, Defendant, once again, failed to timely respond to Plaintiff’s discovery requests.

5. After the expiration of Defendant’s untimely extension request, on December 12, 2017, the undersigned sent Defendant’s Counsel correspondence seeking Defendant’s discovery responses. *See* Correspondence attached hereto and incorporated herein as Composite Exhibit “C.” Defendant’s Counsel sought a second extension of one (1) week, and, in response, was advised that there was no objections to this request so long as Defendant agreed there would be no objections and that all documents would be produced contemporaneously. *Id.*

6. On December 19, 2017, after receiving no discovery responses and hearing nothing from Defendant’s Counsel, the undersigned sent yet another email advising that a motion to compel would be forthcoming. *See* Correspondence attached hereto and incorporated herein as Exhibit “D.”

7. Out of professional courtesy, the undersigned held off filing said motion to compel, and instead gave opposing counsel additional time to provide responses to Plaintiff’s discovery requests.

8. Finally, on January 29, 2018, Defendant filed its Response to Plaintiff’s First Request for Production of Documents. However, Defendant failed to provide Answers to Plaintiff’s First Set of Interrogatories.

9. Additionally, upon review of the documents provided by Defendant, the undersigned realized that many of the emails produced by Defendant were cut off on the right

side. *See* Documents Produced by Defendant attached hereto and incorporated herein as Composite Exhibit “E.”

10. On January 29, 2018, the undersigned sent opposing counsel correspondence advising of the foregoing and requesting that proper copies of the documents be produced. Plaintiff also requested that Defendant serve its Answers to Plaintiff’s First Set of Interrogatories. *See* Correspondence attached hereto and incorporated herein as Exhibit “F.” Opposing counsel failed to respond. *Id.*

11. On February 19, 2018, additional correspondence was sent to Defendant’s Counsel requesting the same information requested on January 29, 2018. *See* Correspondence attached hereto and incorporated herein as Exhibit “G.” Defendant’s counsel did not respond.

12. On February 26, 2018, in a final attempt to resolve this matter without the need of court intervention, the undersigned sent additional correspondence to Defendant’s Counsel requesting Defendant’s Answers to Plaintiff’s First Set of Interrogatories and a complete copy of all responsive documents. Counsel was advised that a motion to compel would be filed and that sanctions would be sought.

13. Realizing what had occurred, a few minutes later, Defendant’s Counsel contacted Plaintiff’s Counsel stating that Defendant’s interrogatory answers would be served the following day. This never happened.

14. In fact, Defendant didn’t serve interrogatory answers until March 2, 2018, nearly five months after Defendant was initially served. To add insult to injury, the Defendant served unverified responses. *See* Defendant’s Unverified Response to Plaintiff’s First Set of Interrogatories attached hereto and incorporated herein as Exhibit “H.”

15. To date, Defendant has failed to provide verified responses to Plaintiff's interrogatories.

16. Defendant has also failed to provide a complete copy of all responsive documents.

17. Accordingly, Plaintiff hereby requests this Honorable Court enter an order compelling Defendant to provide Plaintiff with legible and proper documents in response to Plaintiff's Request for Production and verified responses to Plaintiff's First Set of Interrogatories.

**WHEREFORE**, the undersigned counsel respectfully requests the entry of an Order Granting Plaintiff's Motion to Compel and Sanctions, and granting such further relief as this Court deems just and proper.

Dated this 22<sup>nd</sup> day of March, 2018.

Respectfully Submitted,

**/s/ Noah E. Storch**

Noah E. Storch, Esq.

Florida Bar No. 0085476

RICHARD CELLER LEGAL, P.A.

7450 Griffin Road, Suite 230

Davie, Florida 33314

Telephone: (866) 344-9243

Facsimile: (954) 337-2771

E-mail: [noah@floridaovertimelawyer.com](mailto:noah@floridaovertimelawyer.com)

*Counsel for Plaintiff*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 22<sup>nd</sup> day of March, 2018, I electronically filed the foregoing Motion to Compel and for Sanctions, via the e-file portal which will send an electronic filing of all Counsel of Record and also via e-mail to John D. “Jack” Webb, Esq., *Attorney for the Defendant* at: ([jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)).

# EXHIBIT A

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
IN AND FOR DUVAL COUNTY, FLORIDA**

**DARLENE PEOPLES,**

**CASE NO.: 2017 CA 003340**

**Plaintiff,**

**vs.**

**COMMUNITY REHABILITATION  
CENTER, INC.,  
a Florida Not For Profit Corporation,**

**Defendant.** \_\_\_\_\_/

**NOTICE OF SERVING PLAINTIFF'S FIRST SET OF  
INTERROGATORIES TO DEFENDANT**

Plaintiff, **DARLENE PEOPLES**, by and through her undersigned counsel, hereby notices the serving of her First Set of Interrogatories to Defendant, to be answered, under oath, in accordance with the Florida Rules of Civil Procedure, within thirty (30) days of the service date hereof.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 10th day of October, 2017, I e-filed the foregoing via E-file Portal and email to *Attorney for Defendant*, Jack Webb, Esq., at [jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com).

**By: /s/Noah E. Storch**

Noah E. Storch, Esq.

Florida Bar No.: 0085476

Richard Celler, Esq.

Florida Bar No.: 0173370

Richard Celler Legal, P.A.

7450 Griffin Road, Suite 230

Davie, FL 33314

Telephone: (866) 344-9243

Facsimile: (954) 337-2771

Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)

Email: [Richard@floridaovertimelawyer.com](mailto:Richard@floridaovertimelawyer.com)

*Attorney for Plaintiff*

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
IN AND FOR DUVAL COUNTY, FLORIDA**

**DARLENE PEOPLES,**

**CASE NO.: 2017 CA 003340**

**Plaintiff,**

**vs.**

**COMMUNITY REHABILITATION  
CENTER, INC.,  
a Florida Not For Profit Corporation,**

**Defendant.** /

**PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT**

Plaintiff, **DARLENE PEOPLES**, pursuant to Florida Rules of Civil Procedure, propounds the following Interrogatories to Defendant, **COMMUNITY REHABILITATION CENTER, INC.**, to be answered in writing, under oath and in accordance with the Florida Rules of Civil Procedure.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 10<sup>th</sup> day of October, 2017, I emailed to *Attorney for Defendant*, Jack Webb, Esq., at [jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com).

**By: /s/Noah E. Storch**

Noah E. Storch, Esq.

Florida Bar No.:0085476

Richard Celler, Esq.

Florida Bar No.: 0173370

Richard Celler Legal, P.A

7450 Griffin Road, Suite 230

Davie, FL 33314

Telephone: (866) 344-9243

Facsimile: (954) 337-2771

Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)

Email: [Richard@floridaovertimelawyer.com](mailto:Richard@floridaovertimelawyer.com)

*Attorney for Plaintiff*



## **DEFINITIONS**

For Purposes of these Interrogatories:

- a. "Person" includes corporations, partnerships, and other business or legal entities, as well as individuals.
- b. "Identify" when used in reference to an individual means to state his full name, present or last known address, present employment position or business affiliation and phone number.
- c. "Identify" when used in reference to an entity means to identify whether the entity is a corporation, partnership or other organization, and the present or last known address of the principal place of business.
- d. "Identify" when used in reference to documents means to specifically state the type of document (e.g. letter, interoffice memorandum) and the following: (1) information sufficient to enable the inquirer to identify the document such as the nature of the document, the date, name or names of addressee(s), author(s) or recipient(s), name of signer(s), title or heading of the document and approximate number of pages.
- c. "Plaintiff" refers to Plaintiff, **DARLENE PEOPLES**.
- d. Defendant(s)" and "you" and "your" refers to, the Defendant **COMMUNITY REHABILITATION CENTER, INC.**

### **DEFENDANT'S ANSWER TO PLAINTIFF'S INTERROGATORIES**

1. What is the name and address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

**ANSWER:**

2. List the names and addresses of all persons who are believed or known to have any knowledge concerning any of the issues in this lawsuit and specify the subject matter about which the witness has knowledge.

**ANSWER:**

3. If you have ever talked to the Plaintiff or Plaintiff's co-workers, former co-workers, agents, servants, employees, friends, partners, or anyone who has or who may have knowledge of Plaintiff regarding Plaintiff's claims in this lawsuit or have any knowledge, either directly or indirectly, of any statement or admission of any kind made by Plaintiff or anyone acting on Plaintiff's behalf regarding Plaintiff's claims or any other fact that might be relevant to this lawsuit, describe in detail such statement and/or admission and identify who made the statement or admission, to whom it was made, and the date it was made.

**ANSWER:**

4. Did Plaintiff ever complain to Defendant that she felt she was being treated unfairly or improperly in the work place? If so, please provide the date of such complaint, the person(s) to whom Plaintiff complained, the resolution of such complaint, and identify any and all documents that support your answer to this Interrogatory?

**ANSWER:**

5. Identify any and all individuals with knowledge of the allegations made by Plaintiff in this action or Defendant's defenses. Please provide the name, telephone number, job position, and last known address of each individual identified, and state whether he/she is a current or former employee.

**ANSWER:**

6. Was Plaintiff a poorly performing employee for Defendant? If so, please explain in what manner Plaintiff was performing poorly, the date(s) of such incident(s) of poor performance, the person(s) who have knowledge regarding such poor performance, and identify any and all documents supporting your answer to this Interrogatory?

**ANSWER:**

7. Please describe Plaintiff's position held with Defendant during her employment, Plaintiff's rate of pay, schedule and hours worked, and identify any and all documents that support your answer to this Interrogatory.

**ANSWER:**

8. Describe in detail all facts, proof, or evidence which, in whole or in part, form the basis of any defense or affirmative defenses pled in this lawsuit.

**ANSWER:**

9. Identify any and all non-privileged documents upon which Defendant relied in answering each of the above Interrogatories, and for each such document identified, please provide the Interrogatory Number that such document relates to.

**ANSWER:**

By \_\_\_\_\_

STATE OF \_\_\_\_\_

COUNTY OF \_\_\_\_\_

BEFORE ME, the undersigned authority, on this day, personally appeared \_\_\_\_\_, who being first duly sworn, deposes and says that he/she has read the foregoing Answers to Interrogatories, knows the contents of same, and to the best of his/her knowledge and belief, the same are true and correct.

SWORN TO AND SUBSCRIBED before me this \_\_\_\_ day of \_\_\_\_\_, 2017.

The Affiant, \_\_\_\_\_, is [ ] personally known to me or [ ] has produced \_\_\_\_\_ as identification, which is current or has been issued within the past five years and bears a serial number or other identifying number.

\_\_\_\_\_  
Print Name:

\_\_\_\_\_  
NOTARY PUBLIC-STATE OF \_\_\_\_\_

Commission Number: \_\_\_\_\_

My commission expires: \_\_\_\_\_

(Notary Seal)

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
IN AND FOR DUVAL COUNTY, FLORIDA**

**DARLENE PEOPLES,**

**CASE NO.: 2017 CA 003340**

**Plaintiff,**

**vs.**

**COMMUNITY REHABILITATION  
CENTER, INC.,  
a Florida Not For Profit Corporation,**

**Defendant.** \_\_\_\_\_/

**PLAINTIFF'S FIRST REQUEST TO PRODUCE TO DEFENDANT**

Plaintiff, **DARLENE PEOPLES**, pursuant to Florida Rules of Civil Procedure, requests that Defendant, **COMMUNITY REHABILITATION CENTER, INC**, produce the documents requested below to Plaintiff according to the Florida Rules of Civil Procedure.

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on this 10<sup>th</sup> day of October, 2017, I e-filed the foregoing via E-file Portal and emailed a confirmed copy to *Attorneys for Defendant*, Jack Webb, Esq., at [jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com).

**By: /s/Noah E. Storch**

Noah E. Storch, Esq.

Florida Bar No.:0085476

Richard Celler, Esq.

Florida Bar No.: 0173370

Richard Celler Legal, P.A

7450 Griffin Road, Suite 230

Davie, FL 33314

Telephone: (866) 344-9243

Facsimile: (954) 337-2771

Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)

Email: [Richard@floridaovertimelawyer.com](mailto:Richard@floridaovertimelawyer.com)

*Attorney for Plaintiff*

### **INSTRUCTIONS FOR USE**

A. This Request for Production of Documents is continuing in nature. If further documents come into the knowledge or possession of the Defendant, supplementation of the Response to this Request for Production of Documents is required.

B. Unless otherwise indicated, this Request refers to the time frame of the beginning of the Plaintiff's employment through the date of her termination and to the place and circumstances of the events mentioned or complained of in the pleadings.

C. If the original of any document herein requested is not in your custody, control or possession, please state to the best of your knowledge the name, address, and telephone number of the person or entity in possession, custody or control of the original.

D. In response to any document request, if any document requested has been discarded, destroyed or otherwise disposed of, please identify such document by stating the following: (1) its author or preparer; (2) its date or dates of preparation; (3) the addressee(s); (4) the subject matter of the document; (5) all persons to whom it was distributed; (6) the date, manner and reason for destruction or other disposition of the document; and (7) the name of the person who authorized or requested the destruction or other disposition of the document.

E. If you consider any document called for by the Request for Production of Documents to be privileged from production, you must include in your answer to the Request for Production of Documents: (1) a list of documents withheld from production, identifying each document by date, addressee, author, title and subject matter; (2) the identify of those persons who have seen the document or who have seen copies of it; and (3) a statement of the ground(s) upon which each such document is considered privileged.

F. All uses of the conjunctive shall be interpreted as also including the disjunctive and vice versa. Words in the singular shall be read to include the plural and vice versa.

G. Segregate and identify all documents produce according to the request's number and subdivision to which each is responsive. If it is determined that a document is responsive to more than one request or sub-part of a request, produce the document pursuant to the first numbered request to which it is responsive and list the other request to which it is also responsive.

H. Produce each document in its entirety, including all attachments, cover memoranda, appendices, even if only a portion of the document is responsive to the request.

## **DEFINITIONS**

For Purposes of these Requests for Production:

- a. "Documents" includes writings or recording of every kind or character including, without limitation, all correspondence, contracts, agreements, letters, invoices, reports, records, memoranda, computer printouts, pamphlets, photographs, notes of meetings, including materials taped, filmed, or photographed and all other matters commonly considered to be documents.
- b. "Related to" means concern, explain, contain, correspond to, evidence or discuss, or to be in any way legally, logically, or factually connected with the matter inquired of.
- c. "And" and "or" are used herein both in the conjunctive and disjunctive.
- d. "Identify" when used in reference to documents means to specifically state the type of document (e.g. letter, interoffice memorandum) and the following: (1) information sufficient to enable the inquirer to identify the document such as the nature of the document, the date, name or names of addressee(s), author(s) or recipient(s), name of signer(s), title or heading of the document and approximate number of pages.
- e. "Plaintiff" refers to Plaintiff, **DARLENE PEOPLES**.
- f. "Defendant(s)" and "you" and "your" refers to, the Defendant **COMMUNITY REHABILITATION CENTER, INC.**



### **REQUESTS FOR PRODUCTION**

1. Please produce any all documents identified in response to Plaintiff's First Set of Interrogatories.
2. Please produce any and all documents supporting Defendant's reason(s) for terminating Plaintiff.
3. Please produce any and all witness statements Defendant secured regarding Plaintiff's claims or for unemployment or in this case.
4. The personnel file of Plaintiff.
5. Defendant's Employee Handbook.
6. Any and all policies and procedures in Defendant's workplace regarding retaliation or whistleblowing the workplace.
7. Any and all documents relating to Plaintiff's job performance during her employment with Defendant including any performance reviews and notes therefrom.
8. Any and all documents relating to and/or reflecting medical treatment provided by Plaintiff to Defendant's patients.
9. Any and all documents relating to communications, whether oral or written, and/or discussions between Defendant and Plaintiff relating to, involving, discussing and/or concerning any allegation(s) in the Complaint.
10. Any and all documents relating to communications, whether oral or written, and/or discussions between Defendant and Plaintiff relating to, involving, discussing and/or concerning any allegation(s) in the Complaint.
11. Any and all insurance policies and/or agreements under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.
12. Any and all documents relating to, evidencing and/or concerning Plaintiff's complaints and/or objections to any policies, procedures, practices, and/or guidelines of Defendant.
13. Any and all documents relating to Defendant's security deposit policies, practices, and/or procedures.
14. Statements, sworn or unsworn, of any person with knowledge of the allegations made by Plaintiff in this action, or which Defendant believes support or refute, or tend to support or refute, Plaintiff's claims in this action.

15. Any and all documents relating to Defendant's oral conversations and/or written correspondence or communications with any person (other than counsel) that relate to the allegations set forth in the Complaint, or in the Defendant's Answer, not otherwise produced in response to the other numbered Requests herein.
16. Copies of all emails sent by Plaintiff to Defendant or any of Defendant's officers, directors, employees or agents, from December 3, 2013, through the present.
17. Copies of all emails sent by Defendant or any of Defendant's officers, directors, employees or agents, to Plaintiff from December 3, 2013, through the present.
18. Any and all documents relating to Plaintiff's employment with Defendant.
19. All documents that Defendant contends may constitute an admission or statement against interest by Plaintiff.
20. Any and all documents evidencing that Plaintiff was performing poorly during his employment with Defendant.
21. Any and all documents demonstrating Plaintiff's hours worked, pay received, or benefits to which he was entitled during his employment with Defendant.
22. Any and all documents submitted by Defendant in opposition to Plaintiff's claim for unemployment benefits.
23. Any and all documents sent by, or received by, Defendant sent to third parties (excluding work product or privileged documents) regarding Plaintiff's employment.
24. All form W-2s or 1099s prepared for Plaintiff by Defendant.
25. Any and all documents relating to amounts paid to Plaintiff as salary or bonuses during his employment with Defendant.
26. Any and all documents submitted by Defendant to the State of Florida regarding Plaintiff's employment.
27. All documents relating to Plaintiff's employment with Defendant including, but not limited to: job duties, performance appraisals, performance evaluations, hours worked, disciplinary reports, memos, and performance plans.
28. Any and all documents, not otherwise produced in response to the Requests set forth herein, which are in Defendant's possession, custody, or control, which Defendant may use to support its claims or defenses, or which Defendant asserts support its claims or defenses, or which Defendant reasonably believes supports its claims or defenses.

29. The corporate or organizational chart of Defendant.
30. All documents Defendant intends to use at trial in this matter.
31. All documents forming the factual basis for Defendant's affirmative defenses, if any, in this matter.
32. Any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment.
33. The personnel file of Angela Malone.
34. The personnel file of Ryan White.
35. The personnel file of Halima Scurry.
36. The personnel file of Paul Jamison.
37. The personnel file of Erakel Goodman.
38. The personnel file of Demika Jackson.
39. The personnel file of Kenneth Arnold.
40. The personnel file of the individual who replaced Plaintiff after Plaintiff was terminated.
41. Any and all documents including any electronic media or emails, relating to, evidencing and/or concerning Plaintiff's complaints and/or objections to any policies, procedures, practices, and/or guidelines of Defendant.
42. All documents that Defendant contends may constitute an admission or statement against interest by Plaintiff.
43. Any and all documents evidencing that Plaintiff was performing poorly during his employment with Defendant or otherwise not meeting the requirements of his employment.
44. Any and all documents submitted by Defendant in opposition to Plaintiff's claim for unemployment benefits.
45. Any and all documents sent by, or received by, Defendant sent to third parties (excluding work product or privileged documents) regarding Plaintiff's employment.
46. Any and all documents which relate and/or refer to investigations conducted by Defendant's Chief of Compliance relating to complaints and/or concerns of Plaintiff.

47. Any and all documents which relate and/or refer to investigations conducted at the request of Defendant's Chief of Compliance relating to complaints and/or concerns of Plaintiff.

# EXHIBIT B

## Alexandra Scala

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**From:** Jack Webb <jwebb@jackwebblaw.com>  
**Sent:** Thursday, November 16, 2017 11:31 AM  
**To:** Noah Storch; Alexis Richey  
**Cc:** Alexandra Scala  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

That should work. Thanks

John D. "Jack" Webb, Esq.  
John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
904.803.4686  
jwebb@jackwebblaw.com

---

**From:** Noah Storch [mailto:Noah@floridaovertimelawyer.com]  
**Sent:** Thursday, November 16, 2017 11:29 AM  
**To:** Jack Webb <jwebb@jackwebblaw.com>; Alexis Richey <arichey@jackwebblaw.com>  
**Cc:** Alexandra Scala <Alexandra@floridaovertimelawyer.com>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

So long as all documents are produced with the responses, yes. Please confirm.

Regards,

### Noah E. Storch, Esq.

Partner, Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

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**From:** Jack Webb [mailto:jwebb@jackwebblaw.com]  
**Sent:** Thursday, November 16, 2017 11:27 AM  
**To:** Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)>; Indira Karan <[Indira@floridaovertimelawyer.com](mailto:Indira@floridaovertimelawyer.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Cc:** Alexandra Scala <[Alexandra@floridaovertimelawyer.com](mailto:Alexandra@floridaovertimelawyer.com)>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

My apologies. I had kind of put this on the backburner. Can I get until Nov. 27<sup>th</sup> for the responses (in light of Thanksgiving) and I will get the client to commit to either settling or moving forward?

John D. "Jack" Webb, Esq.

John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
904.803.4686  
[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)

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**From:** Noah Storch [<mailto:Noah@floridaovertimelawyer.com>]  
**Sent:** Thursday, November 16, 2017 11:25 AM  
**To:** Indira Karan <[Indira@floridaovertimelawyer.com](mailto:Indira@floridaovertimelawyer.com)>; Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Cc:** Alexandra Scala <[Alexandra@floridaovertimelawyer.com](mailto:Alexandra@floridaovertimelawyer.com)>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

Good Morning,

We have not received Defendant's discovery responses. Please advise as to when we can expect to receive them. Jack, we need to move the case forward if your client is not interested in resolution. Thanks.

Regards,

**Noah E. Storch, Esq.**

Partner, Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

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**From:** Indira Karan  
**Sent:** Wednesday, October 11, 2017 9:09 AM  
**To:** 'jwebb@jackwebblaw.com' <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>; 'arichey@jackwebblaw.com' <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Cc:** Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)>; Alexandra Scala <[Alexandra@floridaovertimelawyer.com](mailto:Alexandra@floridaovertimelawyer.com)>  
**Subject:** FW: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

Court Identity:	COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT IN AND FOR DUVAL COUNTY, FLORIDA
Case No.:	2017 CA 003340
Plaintiff(s):	DARLENE PEOPLES, an individual
Defendant(s):	COMMUNITY REHABILITATION CENTER INC, a Florida Profit Corporation
Documents being served:	<ul style="list-style-type: none"><li>• Plaintiff's First Set of Interrogatories to Defendant</li><li>• Plaintiff's Notice of Serving Interrogatories to Defendant</li><li>• Plaintiff's First Set of Request for Production to Defendant</li></ul>
Sender's name:	Indira Karan
Sender's phone number:	(866) 344-9243 x105

Note:	
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Sincerely,

**Indira Karan**-Paralegal to

Celler Legal, P.A.

7450 Griffin Road

Suite 230

Davie, Florida 33314

Telephone: (866) 344-9243 x105

Facsimile: (954) 337-2771

Email: **Indira@floridaovertimelawyer.com**

Website: **www.floridaovertimelawyer.com**



# EXHIBIT C

## Alexandra Scala

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**From:** Jack Webb <jwebb@jackwebblaw.com>  
**Sent:** Tuesday, December 12, 2017 4:10 PM  
**To:** Noah Storch  
**Cc:** Alexis Richey; Alexandra Scala  
**Subject:** Re: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

In ny on a hearing until Friday. Spoke with the client last night. Give me until next week?

John D. "Jack" Webb, Esq.  
John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
904.803.4686  
[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)

Sent from my iPhone

On Dec 12, 2017, at 3:59 PM, Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)> wrote:

Jack,

I need this to get resolved, or I need to file a motion. I need the discovery by the ned of the week.

Regards,

**Noah E. Storch, Esq.**

Partner. Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Jack Webb [<mailto:jwebb@jackwebblaw.com>]  
**Sent:** Thursday, November 16, 2017 11:31 AM  
**To:** Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Cc:** Alexandra Scala <[Alexandra@floridaovertimelawyer.com](mailto:Alexandra@floridaovertimelawyer.com)>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

That should work. Thanks

John D. "Jack" Webb, Esq.  
John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
904.803.4686

## Alexandra Scala

---

**From:** Noah Storch  
**Sent:** Thursday, December 14, 2017 11:05 AM  
**To:** 'Jack Webb'  
**Cc:** Alexis Richey; Alexandra Scala  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

I can give you until Tuesday. I expect no objections and all documents to be produced contemporaneously.

Regards,

**Noah E. Storch, Esq.**

Partner, Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Jack Webb [mailto:[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)]  
**Sent:** Tuesday, December 12, 2017 4:10 PM  
**To:** Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)>  
**Cc:** Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>; Alexandra Scala <[Alexandra@floridaovertimelawyer.com](mailto:Alexandra@floridaovertimelawyer.com)>  
**Subject:** Re: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

In ny on a hearing until Friday. Spoke with the client last night. Give me until next week?

John D. "Jack" Webb, Esq.  
John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
[904.803.4686](tel:904.803.4686)  
[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)

Sent from my iPhone

On Dec 12, 2017, at 3:59 PM, Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)> wrote:

Jack,

I need this to get resolved, or I need to file a motion. I need the discovery by the ned of the week.

Regards,

**Noah E. Storch, Esq.**  
Partner, Celler Legal

# EXHIBIT D

## Alexandra Scala

---

**From:** Jack Webb <jwebb@jackwebblaw.com>  
**Sent:** Tuesday, December 19, 2017 9:08 PM  
**To:** Noah Storch  
**Cc:** Alexis Richey; Alexandra Scala  
**Subject:** Re: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENT - CASE NUMBER 162017CA003340XXXXMA

Ouch. I will call you in the morning.

John D. "Jack" Webb, Esq.  
John D. Webb, P.A.  
10751 Deerwood Park Blvd., Ste. 105  
Jacksonville, FL 32256  
904.803.4686  
jwebb@jackwebblaw.com

Sent from my iPhone

On Dec 19, 2017, at 9:01 PM, Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)> wrote:

Having received nothing I am moving to compel tomorrow. Seeking fees and costs.

Regards,

**Noah E. Storch, Esq.**  
Partner, Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

On Dec 14, 2017, at 11:04 AM, Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)> wrote:

I can give you until Tuesday. I expect no objections and all documents to be produced contemporaneously.

Regards,

**Noah E. Storch, Esq.**  
Partner, Celler Legal  
7450 Griffin Road, Suite 230  
Davie, Florida 33314  
Toll Free: 866-344-9243 X 106  
Fax: 954-337-2771  
Email: [Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

# EXHIBIT E

## Paula Jamison

---

**From:** Erakal Goodman  
**Sent:** Thursday, August 11, 2016 1:04 PM  
**To:** 'Evelyn Woodward'  
**Cc:** Paula Jamison  
**Subject:** RE: Darlene Peoples

Ev,

We will continue the "development" process for her as well as any staff that feels as if they are not equipped to do their jobs as they felt that our staff was not trained on tx plans, notes, etc. because they advised her that they did not receive adequate training. I have spoken to Mr. Gaffney and we decided that Ms. Paula will send out a "training needs" to all staff so that this isn't an issue that we have as a Mental Health Counselor. Brian will be here Monday to address any training needs at 10:00. He is who the City uses, so person to person the "drama" of other matters. I also called DCF to ensure that this matter was handled adequately. You are a professional and

*Erakal Goodman, PhD*

Chief Operations Officer  
623 Beechwood St.  
Jacksonville, FL 32206  
[egoodman@communityrehabcenter.org](mailto:egoodman@communityrehabcenter.org)  
Office (904) 358-1211  
Fax (877) 561-3541  
Cell (904) 422-5035

**From:** Evelyn Woodward [mailto:woodwardte@gmail.com]  
**Sent:** Thursday, August 11, 2016 12:17 PM  
**To:** Erakal Goodman  
**Cc:** Paula Jamison  
**Subject:** Re: Darlene Peoples

Well.. we are speaking more to perception than reality. The perception is that the training was inadequate, not that it was and providing incentive, it then shifts the responsibility from you and the agency, to herself. Currently, she is very involved in development, than negativity-see this change as more opportunity than an indictment. I think that engagement will assist.  
Ev

On Thu, Aug 11, 2016 at 10:08 AM, Erakal Goodman <[egoodman@communityrehabcenter.org](mailto:egoodman@communityrehabcenter.org)> wrote:

Evelyn,

Thank you for your feedback, I appreciate your assessment. For the record, Ms. Peoples received training from Brian (Ryan White) questions she may have had based off of her involvement with Ryan White. In addition, I spoke at length to Deidre Kelly who performs the job duties with ease as long as they have been trained on Careware and aware of documentation requirements. So I will see if they have created something specific for their individual agencies.

PEOPLES-CRC\_000023

Ms. Peoples stated to me that she did not feel that anyone in the position prior to her performed their job duties adequately a statement. She shared that Halima Scurry did not do anything she was supposed to and did not meet with people but simply c information.

In reference to her being a "team-lead" she must first possess leadership qualities, which she fails to exhibit. Unfortunately, w

Relating to salaried staff clocking in, it is more of accountability measures as salaried staff have abused this privilege horribly. 1 Jamison can attest to that as many staff, including Ms. Peoples fail to adhere to schedules and come in and leave when they se to avoid suspension and ultimately termination if the problem exists. We have allowed a lot of flexibility, but we cannot chang

If you have other recommendations based off this additional information, please advise. I am really battling how to handle this that she voices from one staff member to another. None positive.

*Erakal Goodman, PhD*

Chief Operations Officer

623 Beechwood St.

Jacksonville, FL 32206

[egoodman@communityrehabcenter.org](mailto:egoodman@communityrehabcenter.org)

Office (904) 358-1211

Fax (877) 561-3541

Cell (904) 422-5035

**From:** Evelyn Woodward [mailto:[woodwardte@gmail.com](mailto:woodwardte@gmail.com)]

**Sent:** Thursday, August 11, 2016 9:10 AM

**To:** Erakal Goodman; Paula Jamison

**Subject:** Darlene Peoples

So... I met with Ms. Peoples yesterday in relation to her grievances. As with anyone in her situation, there is the huma concrete reasons (low productivity, etc).

PEOPLES-CRC\_000024



I spoke with her at length. There doesn't appear to be any validity regarding her claims of disparate treatment or safety.

Allow me to offer a "win-win" for both the agency and Ms. Peoples. She is a Master's Level clinician with good skills; the problem areas" in Ryan White. Give her some "Team Lead" duties (no change in pay) consisting of learning/ studying and provide some Protected Time to perform these duties ( 25%-30%).

**Here's my rationale: bringing her more "into the fold" cuts off other negative influences within the agency, utilizing the program, which as always been problematic-in part due to the skill deficits of staff. Bottom line it will take the**

This is an aside: is she salaried/exempt? If she is, why are you continuing the practice "clocking-in: with this level of the day, not the hour, so clocking in and out isn't really necessary for this level.

Give this some consideration as it could be a "win-win" for everyone!

Ev

## Paula Jamison

---

**From:** Evelyn Woodward <woodwardte@gmail.com>  
**Sent:** Thursday, August 11, 2016 12:17 PM  
**To:** Erakal Goodman  
**Cc:** Paula Jamison  
**Subject:** Re: Darlene Peoples

Well.. we are speaking more to perception than reality. The perception is that the training was inadequate, not that it was and providing incentive, it then shifts the responsibility from you and the agency, to herself. Currently, she is very in development, than negativity-see this change as more opportunity than an indictment. I think that engagement will assist. Ev

On Thu, Aug 11, 2016 at 10:08 AM, Erakal Goodman <[egoodman@communityrehabcenter.org](mailto:egoodman@communityrehabcenter.org)> wrote:

Evelyn,

Thank you for your feedback, I appreciate your assessment. For the record, Ms. Peoples received training from Brian (Ryan White) questions she may have had based off of her involvement with Ryan White). In addition, I spoke at length to Deidre Kelly who perform the job duties with ease as long as they have been trained on Careware and aware of documentation requirements. See if they have created something specific for their individual agencies.

Ms. Peoples stated to me that she did not feel that anyone in the position prior to her performed their job duties adequately a statement. She shared that Halima Scurry did not do anything she was supposed to and did not meet with people but simply collected information.

In reference to her being a "team-lead" she must first possess leadership qualities, which she fails to exhibit. Unfortunately, we

Relating to salaried staff clocking in, it is more of accountability measures as salaried staff have abused this privilege horribly. I Jamison can attest to that as many staff, including Ms. Peoples fail to adhere to schedules and come in and leave when they see to avoid suspension and ultimately termination if the problem exists. We have allowed a lot of flexibility, but we cannot change

If you have other recommendations based off this additional information, please advise. I am really battling how to handle this that she voices from one staff member to another. None positive.

*Erakal Goodman, PhD*

PEOPLES-CRC\_000026

Chief Operations Officer

623 Beechwood St.

Jacksonville, FL 32206

[egoodman@communityrehabcenter.org](mailto:egoodman@communityrehabcenter.org)

Office (904) 358-1211

Fax (877) 561-3541

Cell (904) 422-5035

**From:** Evelyn Woodward [mailto:[woodwardte@gmail.com](mailto:woodwardte@gmail.com)]

**Sent:** Thursday, August 11, 2016 9:10 AM

**To:** Erakal Goodman; Paula Jamison

**Subject:** Darlene Peoples

So... I met with Ms. Peoples yesterday in relation to her grievances. As with anyone in her situation, there is the human concrete reasons (low productivity, etc).

I spoke with her at length. There doesn't appear to be any validity regarding her claims of disparate treatment or safety.

Allow me to offer a "win-win" for both the agency and Ms. Peoples. She is a Master's Level clinician with good skills; the problem areas" in Ryan White. Give her some "Team Lead" duties (no change in pay) consisting of learning/ studying and provide some Protected Time to perform these duties ( 25%-30%).

**Here's my rationale: bringing her more "into the fold" cuts off other negative influences within the agency, utilizing her skills in the program, which as always been problematic-in part due to the skill deficits of staff. Bottom line it will take the**

This is an aside: is she salaried/exempt? If she is, why are you continuing the practice "clocking-in: with this level of the day, not the hour, so clocking in and out isn't really necessary for this level.

Give this some consideration as it could be a "win-win" for everyone!

Ev

PEOPLES-CRC\_000027

So... I met with Ms. Peoples yesterday in relation to her grievances. As with anyone in her situation, there is the human concrete reasons (low productivity, etc).

I spoke with her at length. There doesn't appear to be any validity regarding her claims of disparate treatment or safety.

Allow me to offer a "win-win" for both the agency and Ms. Peoples. She is a Master's Level clinician with good skills in the "problem areas" in Ryan White. Give her some "Team Lead" duties (no change in pay) consisting of learning/ studying and provide some Protected Time to perform these duties ( 25%-30%).

**Here's my rationale: bringing her more "into the fold" cuts off other negative influences within the agency, utilizing the program, which as always been problematic-in part due to the skill deficits of staff. Bottom line it will take the**

This is an aside: is she salaried/exempt? If she is, why are you continuing the practice "clocking-in: with this level of the day, not the hour, so clocking in and out isn't really necessary for this level.

Give this some consideration as it could be a "win-win" for everyone!

Ev

# EXHIBIT F

## Alexandra Scala

---

**From:** Kelly Romero  
**Sent:** Monday, January 29, 2018 2:59 PM  
**To:** 'Alexis Richey'  
**Cc:** Noah Storch; Alexandra Scala  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340  
**Attachments:** PEOPLES-CRC\_000001-000059.pdf

Alexis:

I am reviewing the documents sent over today and I noticed that the emails are all cut off on the ride side. Can you please take a look and send us a full copy of the emails in this packet?

Thank you,

**Kelly Romero**-Paralegal to  
Richard Celler, Esq. and  
Noah E. Storch, Esq.  
Richard Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x102  
Facsimile: (954) 337-2771  
Email: [kelly@floridaovertimelawyer.com](mailto:kelly@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

**From:** Kelly Romero  
**Sent:** Monday, January 29, 2018 2:34 PM  
**To:** 'Alexis Richey' <arichey@jackwebblaw.com>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340

Hello Alexis:

I don't have the responses to the Interrogatories, can you please forward those to me as well?

**Kelly Romero**-Paralegal to  
Richard Celler, Esq. and  
Noah E. Storch, Esq.  
Richard Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x102

# EXHIBIT G

## Alexandra Scala

---

**From:** Alexandra Scala  
**Sent:** Monday, February 19, 2018 10:57 AM  
**To:** 'arichey@jackwebblaw.com'  
**Cc:** Kelly Romero  
**Subject:** FW: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340  
**Attachments:** PEOPLES-CRC\_000001-000059.pdf  
**Importance:** High

Alexis:

Please see correspondence below. We have reached out to you many times requesting Defendant's interrogatory responses, and have yet to receive same. We also requested you resend the emails contained in your responsive documents, as they are cut off on the right side. I need everything forwarded by the close of business tomorrow, or I will have no choice but to file a motion to compel with the court.

Respectfully,

Alexandra Scala , Esq.  
Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x102  
Facsimile: (954) 337-2771  
Email: alexandra@floridaovertimelawyer.com  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Kelly Romero  
**Sent:** Monday, January 29, 2018 2:59 PM  
**To:** 'Alexis Richey' <arichey@jackwebblaw.com>  
**Cc:** Noah Storch <Noah@floridaovertimelawyer.com>; Alexandra Scala <Alexandra@floridaovertimelawyer.com>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340

Alexis:

I am reviewing the documents sent over today and I noticed that the emails are all cut off on the right side. Can you please take a look and send us a full copy of the emails in this packet?

Thank you,

**Kelly Romero**-Paralegal to  
Richard Celler, Esq. and  
Noah E. Storch, Esq.



Richard Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x102  
Facsimile: (954) 337-2771  
Email: [kelly@floridaovertimelawyer.com](mailto:kelly@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Kelly Romero  
**Sent:** Monday, January 29, 2018 2:34 PM  
**To:** 'Alexis Richey' <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Subject:** RE: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340

Hello Alexis:

I don't have the responses to the Interrogatories, can you please forward those to me as well?

**Kelly Romero**-Paralegal to  
Richard Celler, Esq. and  
Noah E. Storch, Esq.  
Richard Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x102  
Facsimile: (954) 337-2771  
Email: [kelly@floridaovertimelawyer.com](mailto:kelly@floridaovertimelawyer.com)  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Alexis Richey [<mailto:arichey@jackwebblaw.com>]  
**Sent:** Monday, January 29, 2018 2:16 PM  
**To:** Noah Storch <[Noah@floridaovertimelawyer.com](mailto:Noah@floridaovertimelawyer.com)>; Richard Celler <[richard@floridaovertimelawyer.com](mailto:richard@floridaovertimelawyer.com)>; Kelly Romero <[Kelly@floridaovertimelawyer.com](mailto:Kelly@floridaovertimelawyer.com)>; Indira Karan <[Indira@floridaovertimelawyer.com](mailto:Indira@floridaovertimelawyer.com)>  
**Cc:** Jack Webb <[jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com)>; Administrative Assistant <[office@jackwebblaw.com](mailto:office@jackwebblaw.com)>; Alexis Richey <[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)>  
**Subject:** SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340

The attached court document(s) is/are being served upon you via email pursuant to Fla. R. Jud. Admin. 2.516

Court in which proceeding is pending:	In the Circuit Court of the Fourth Judicial Circuit, in and for Duval County Florida
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Case No.:	2017-CA-3340
Name of Initial Party on each side:	Peoples v. Community Rehabilitation Center, Inc.
Title of each document served:	<ul style="list-style-type: none"> <li>Defendant's Response to Plaintiff's First Request for Production of Documents</li> <li>Produced Documents: PEOPLES-CRC_000001-000291 available at this link: <a href="https://jackwebblaw-my.sharepoint.com/:f:/p/jwebb/EjSb4EDY4GhImSmInn4CuoYB8DOJMBFFiTGTYtKwsj7mXw?e=XB">https://jackwebblaw-my.sharepoint.com/:f:/p/jwebb/EjSb4EDY4GhImSmInn4CuoYB8DOJMBFFiTGTYtKwsj7mXw?e=XB</a></li> </ul>
This pleading is being served on behalf of:	John D. "Jack" Webb, Esq. (904) 803-4686

Alexis Richey  
 Paralegal  
 John D. Webb, P.A.  
 10751 Deerwood Park Blvd., Ste. 105  
 Jacksonville, FL 32256  
[arichey@jackwebblaw.com](mailto:arichey@jackwebblaw.com)  
 904.708.1683

## Alexandra Scala

---

**From:** Alexandra Scala  
**Sent:** Monday, February 26, 2018 5:01 PM  
**To:** 'jwebb@jackwebblaw.com'  
**Cc:** Noah Storch  
**Subject:** FW: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340  
**Attachments:** PEOPLES-CRC\_000001-000059.pdf  
**Importance:** High

Mr. Webb:

I phoned you numerous times today, but was unable to reach you. I contacted you in an effort to discuss Defendant's outstanding discovery responses. Our office, on many occasions, has requested that you provide us with Defendant's responses to Plaintiff's First Set of Interrogatories, to no avail. On January 29, 2018, your paralegal, Alexis Richey, advised us that you are "working on getting these finalized." To date, we have received no responses. We also asked that you resend the emails contained in your responsive documents, as they were cut off on the right side. Again, we received no response. I need everything forwarded by noon, tomorrow, February 27, 2018, or I will file a motion to compel with the court and seek sanctions. This is my final attempt to work this out with your firm.

Respectfully,

Alexandra Scala , Esq.  
Celler Legal, P.A.  
7450 Griffin Road  
Suite 230  
Davie, Florida 33314  
Telephone: (866) 344-9243 x111  
Facsimile: (954) 337-2771  
Email: alexandra@floridaovertimelawyer.com  
Website: [www.floridaovertimelawyer.com](http://www.floridaovertimelawyer.com)

---

**From:** Alexandra Scala  
**Sent:** Monday, February 19, 2018 10:57 AM  
**To:** 'arichey@jackwebblaw.com' <arichey@jackwebblaw.com>  
**Cc:** Kelly Romero <Kelly@floridaovertimelawyer.com>  
**Subject:** FW: Peoples, Darlene v Community Rehabilitation Center : SERVICE OF COURT DOCUMENTS: CASE NO.: 2017-CA-3340  
**Importance:** High

Alexis:

# EXHIBIT H

IN THE CIRCUIT COURT OF THE  
FOURTH JUDICIAL CIRCUIT, IN AND  
FOR DUVAL COUNTY, FLORIDA

DARLENE PEOPLES,

PLAINTIFF,

CASE NO: 2017-CA-3340

V.

COMMUNITY REHABILITATION  
CENTER, INC., a not-for-profit Florida  
Corporation,

DEFENDANT.

\_\_\_\_\_ /

**DEFENDANT'S UNVERIFIED RESPONSES TO**  
**PLAINTIFF'S FIRST INTERROGATORIES**

Defendant, Community Rehabilitation Center, Inc., ("CRC"), by and through undersigned counsel, pursuant to Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, hereby objects to and answers Plaintiff, Darlene Peoples First Set of Interrogatories as follows:

**GENERAL OBJECTIONS**

1. CRC objects to each Interrogatory which purports to impose obligations upon CRC beyond the requirements of Rules 1.280 and 1.340 of the Florida Rules of Civil Procedure, which will govern CRC' responses.

2. CRC objects to the Interrogatories as a whole to the extent they seek information protected by the attorney-client privilege and work product doctrine, or any other privilege or immunity provided under applicable law. Although reasonable care has been and shall continue to be made to exclude such items from the answers to these Interrogatories, CRC does not waive such protections with respect to any privileged or work product doctrine information or documents inadvertently included in the answer to the Interrogatories.

3. CRC objects to these interrogatories to the extent that they are overbroad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence.

4. CRC objects to the Interrogatories as a whole and to the extent that they seek confidential information that constitute trade secrets or proprietary commercial information.

5. CRC objects to each instruction, definition, document request, and interrogatory as overbroad and unduly burdensome to the extent it seeks documents or information that are readily or more accessible to Defendant, or from documents or information that Defendant previously produced to Plaintiff. Responding to such requests and interrogatory would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of responding to such requests and interrogatory is substantially the same or less for Defendant as for Plaintiff.

6. In responding to these Interrogatories, CRC does not concede that any interrogatory to which Defendant responds is relevant to the subject matter of this litigation or reasonably calculated to lead to the discovery of admissible evidence. CRC expressly reserves both the right to object to the introduction of responses to these Interrogatories. CRC also reserves the right to question the authenticity, relevancy, materiality, privilege and admissibility as evidence for any purpose of the information provided and the documents identified and/or produced in response to the interrogatories, which may arise in any subsequent proceeding in, or the trial of, this or any other action.

7. CRC incorporates each of the foregoing General Responses and Objections into each and every one of the following specific responses as thought it was fully set forth therein. Any failure to assert any general objection, qualification and/or reservation contained in the General Responses and Objections, or any other objection, qualification and/or reservation shall not be deemed a waiver of such objection, qualification and/or reservation.

**As to objections:**

**JOHN D. WEBB, P.A.**

**s/ John D. Webb**

John D. "Jack" Webb

Florida Bar Number: 051871

34 Cordova Street

St. Augustine, Florida 32084

Telephone: (904) 803-4686

Primary Email:

jwebb@jackwebblaw.com

Secondary Email:

arichey@jackwebblaw.com

## **INTERROGATORIES**

1. What is the name and address of the person answering these interrogatories, and, if applicable, the person's official position or relationship with the party to whom the interrogatories are directed?

**ANSWER: Paula Jamison, Director of Human Resources, 623 Beechwood Street, Jacksonville, FL 32206.**

2. List the names and addresses of all persons who are believed or known to have any knowledge concerning any of the issues in this lawsuit and specify the subject matter about which the witness has knowledge.

**ANSWER: Objection, calls for information protected by the attorney client privilege and attorney work product doctrine. CRC also objects to this interrogatory as premature as discovery is ongoing. Subject to and without waiving the forgoing general and specific objections, CRC responds as follows:**

- **Paula Jamison, Director of Human Resources, CRC, has knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Dr. Erakal Goodman, COO and Corporate Compliance Officer, CRC, has knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Angela Malone, Licensed Mental Health counselor, CRC, has knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Dr. Leon Seymore, Chairman of the Board, Board of Directors, CRC, has limited and indirect knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Evelyn Woodward, Clinical Supervisor, CRC, has knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Dawn Smith, Finance Manager, CRC, has limited and indirect knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Reginald Gaffney, president and CEO, CRC, has limited and indirect knowledge of the claims and defenses in this action; 623 Beechwood Street, Jacksonville, FL 32206.**
- **Halima Scurry, CRC, has knowledge of Plaintiff's position and duties; 623**



**Beechwood Street, Jacksonville, FL 32206.**

- **Deidre V. Kelley, Program Manager, Ryan White Part A Division, Social Services Division, City of Jacksonville, 1809 Art Museum Drive, Suite 100, Jacksonville, FL 32207; has knowledge of the Ryan White Program.**

3. If you have ever talked to the Plaintiff or Plaintiff's co-workers, former co-workers, agents, servants, employees, friends, partners, or anyone who has or who may have knowledge of Plaintiff regarding Plaintiff's claims in this lawsuit or have any knowledge, either directly or indirectly, of any statement or admission of any kind made by Plaintiff or anyone acting on Plaintiff's behalf regarding Plaintiff's claims or any other fact that might be relevant to this lawsuit, describe in detail such statement and/or admission and identify who made the statement or admission, to whom it was made, and the date it was made.

**ANSWER: Objection. Overly broad, unduly burdensome, compound and oppressive as the interrogatory would more appropriately be addressed by way of deposition testimony. Subject to and without waiving the foregoing specific objections, see response to Interrogatory No. 2.**

4. Did Plaintiff ever complain to Defendant that she felt she was being treated unfairly or improperly in the work place? If so, please provide the date of such complaint, the person(s) to whom Plaintiff complained, the resolution of such complaint, and identify any and all documents that support your answer to this Interrogatory?

**ANSWER: Yes. All complaints made to management were documented with dates, individuals identified, and resolution identified. See HR file documents produced: PEOPLES\_CRC\_000001-000059.**

5. Identify any and all individuals with knowledge of the allegations made by Plaintiff in this action or Defendant's defenses. Please provide the name, telephone number, job position, and last known address of each individual identified, and state whether he/she is a current or former employee.

**ANSWER: Objection. Premature as discovery is ongoing. CRC further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome to the extent that it asks for "all individuals." Subject to and without waiving the forgoing general and specific objections, CRC will identify all current and former employees that it is aware of that have knowledge of Plaintiff's claims in this case as follows:**

**See Answer to interrogatory number 2.**

6. Was Plaintiff a poorly performing employee for Defendant? If so, please explain in what manner Plaintiff was performing poorly, the date(s) of such incident(s) of poor performance, the person(s) who have knowledge regarding such poor performance, and identify any and all documents supporting your answer to this Interrogatory[.]

**ANSWER: Yes, Plaintiff had problems with productivity. All performance issues with Plaintiff were documented with dates, individuals identified, and resolution identified. See HR file documents produced: PEOPLES\_CRC\_000001-000059.**

7. Please describe Plaintiff's position held with Defendant during her employment, Plaintiff's rate of pay, schedule and hours worked, and identify any and all documents that support your answer to this Interrogatory.

**ANSWER: Plaintiff provided counseling and social services under a substance abuse program and under the Ryan White Program. Plaintiff's rate of pay and hours worked are documented in CRC-PEOPLES\_000060-000095.**

8. Describe in detail all facts, proof, or evidence which, in whole or in part, form the basis of any defense or affirmative defenses pled in this lawsuit.

**ANSWER: Objection. Premature as discovery is ongoing. CRC further objects to this interrogatory on the grounds that it is overly broad and unduly burdensome to the extent that it asks for "all facts." Subject to and without waiving the forgoing general and specific objections, CRC responds as follows:**

**See documents CRC-PEOPLES\_000001-000291.**

9. Identify any and all non-privileged documents upon which Defendant relied in answering each of the above Interrogatories, and for each such document identified, please provide the Interrogatory Number that such document relates to.

**ANSWER: All non-privileged documents relied upon are identified in each interrogatory response. To the extent that more documents are discovered, CRC will supplement its production and Interrogatory Responses.**

**VERIFICATION**

STATE OF \_\_\_\_\_)

COUNTY OF \_\_\_\_\_)

**BEFORE ME**, the undersigned authority, this day personally appeared \_\_\_\_\_, who being duly sworn, deposes and says that the answers to interrogatories are true and correct to the best of his knowledge, information and belief.

\_\_\_\_\_

Sworn to and subscribed before me this \_\_\_\_\_ day of \_\_\_\_\_, 2015. Such PERSON did take an oath and: *(Notary must check applicable box)*.

- ☐ is/are personally known to me.
- ☐ produced a current Florida driver's license as identification.
- ☐ produced \_\_\_\_\_ as identification.

{Notary Seal must be affixed}

\_\_\_\_\_  
SIGNATURE OF NOTARY

\_\_\_\_\_  
Name of Notary

Commission Number: \_\_\_\_\_  
[if not legible on seal]  
My Commission Expires: \_\_\_\_\_  
[if not legible on seal]

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that, on March 2, 2018, I electronically filed the foregoing with the Clerk of the Court through Florida Court's E-Filing Portal ([www.myflcourtaccess.com](http://www.myflcourtaccess.com)), by using the E-Service Option, which will send a Notice of Electronic Filing, in compliance with Florida Rules of Judicial Administration Rule 2.516, to the following:

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**s/ John D. Webb**

Attorney

**IN THE CIRCUIT COURT OF THE FOURTH JUDICIAL CIRCUIT  
IN AND FOR DUVAL COUNTY, FLORIDA**

**DARLENE PEOPLES,**

**Plaintiff,**

**vs.**

**CASE NO.: 2017 CA 003340**

**COMMUNITY REHABILITATION  
CENTER, INC., a Florida Not for Profit  
Corporation,**

**Defendant.**

**[PROPOSED ORDER] GRANTING PLAINTIFF'S MOTION TO COMPEL AND  
FOR SANCTIONS**

**THIS CAUSE**, having come before the Court upon Plaintiff's Motion to Compel and For Sanctions against Defendant, Community Rehabilitation Center, Inc., is hereby ORDERED AND ADJUGED as follows:

1. Plaintiff's Motion to Compel and Sanctions is hereby GRANTED against Defendant, Community Rehabilitation Center, Inc .

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

DONE AND ORDERED in Chambers in Duval County, Florida, this \_\_\_\_ day of March, 2018.

\_\_\_\_\_  
HONORABLE KEVIN BLAZS  
CIRCUIT COURT JUDGE

cc: Copies furnished to:  
John D. Webb, Esq., ([jwebb@jackwebblaw.com](mailto:jwebb@jackwebblaw.com))  
*Counsel for Defendant*

Noah Storch, Esq. ([noah@floridaovertimelawyer.com](mailto:noah@floridaovertimelawyer.com))  
*Counsel for Plaintiff*