

CITY OF BATON ROUGE/  
PARISH OF EAST BATON ROUGE

NUMBER 610359 SEC. "D"  
19<sup>TH</sup> JUDICIAL DISTRICT COURT

VERSUS

PARISH OF EAST BATON ROUGE

STEPHEN C. MYERS

STATE OF LOUISIANA

**STEPHEN C. MYERS'S SECOND SET OF SUPPLEMENTAL ANSWERS TO  
PLAINTIFFS' INTERROGATORIES AND  
REQUEST FOR PRODUCTION OF DOCUMENTS**

NOW INTO COURT, through undersigned counsel, comes defendant/plaintiff-in-reconvention, STEPHEN C. MYERS ("**MYERS**"), who supplements his responses to the Interrogatories and Requests for Production of Documents propounded by the plaintiff, the CITY OF BATON ROUGE / PARISH OF EAST BATON ROUGE ("**the CITY-PARISH**"), as follows:

**Interrogatory No. 9**

Please provide the names, addresses and telephone numbers of each and every witness you intend to call at the hearing in this matter.

**Answer to Interrogatory No. 9**

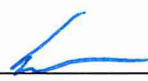
- 5) John Land, Ph. D; 5211 Landing Ct; Baton Rouge, LA 70820; (225) 819-0724; Mr. Land may be called by MYERS to testify as to the existence of unrelated persons in A-1 zoned single family districts such as Lake Beau Pre, as to the impact the occupancy of unrelated persons in A-1 districts has on property values and sales of houses in those areas, and to authenticate the Multiple Listing Service Sales Report showing an increase in per square foot property values since 1998 in University Gardens as well as specifically on Cherrydale Avenue;
- 6) Meg May; 6944 Chandler; Baton Rouge, LA 70808 (225) 937-6037; Ms. May may be called to testify as to the observations of the Cherrydale Avenue property she made while living in University Hills;
- 7) James Edwards; 1953 Christian Street, Baton Rouge, LA 70808; (225) 454-9804; Mr. Edwards may be called to testify as to the fact that most residents living in University Gardens do not notice the characteristics of the individuals who reside

in houses in University Gardens and as to the fact that Paul Naquin vehemently tried to persuade him to testify against MYERS;

- 8) Rob Claitor, 3655 Perkins Road; Baton Rouge, LA 70808; Mr. Claitor may be called to testify as to his observations of the Cherrydale Avenue property;
- 9) Noel Hammatt; 503 Delgado Drive, Baton Rouge, LA 70808; (225) 938-3832; Mr. Hammatt may be called to testify as to his observations of the Cherrydale Avenue property and as to the conditions in which MYERS keeps his properties;
- 10) George Kennedy; 3469-A Hyacinth; Baton Rouge, LA 70808; Mr. Kennedy may be called to testify as to his observations of the Cherrydale Avenue property.

**RESPECTFULLY SUBMITTED,**

**SHOWS, CALI & WALSH, LLP**



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E. Wade Shows (7637)  
John C. Walsh (24903)  
Grant J. Guillot (32484)  
SHOWS, CALI & WALSH, LLP  
628 St. Louis Street (70802)  
P. O. Drawer 4425  
Baton Rouge, LA 70821  
Telephone: (225) 346-1461; Facsimile: (225) 346-1467

*Attorneys for Stephen C. Myers*

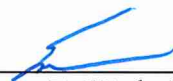
**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing has been served on the CITY OF BATON ROUGE / PARISH OF EAST BATON ROUGE and the OFFICE OF THE ATTORNEY GENERAL, STATE OF LOUISIANA, through their counsel of record listed below, by hand delivery, e-mail, facsimile transmission, and/or by depositing same in the United States Mail, properly addressed and postage prepaid, this 22<sup>nd</sup> day of January, 2013:

Maimuna D. Magee  
222 St. Louis Street  
Baton Rouge, LA 70802  
[MMaGee@brgov.com](mailto:MMaGee@brgov.com)

*Attorney for the City of Baton Rouge /Parish of East Baton Rouge*

Attorney General James D. "Buddy" Caldwell  
Office of the Attorney General, State of Louisiana  
1885 North 3<sup>rd</sup> Street (70802)  
P.O. Box 94005  
Baton Rouge, LA 70804



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E. Wade Shows