

**STATE COURT OF GWINNETT COUNTY  
GEORGIA**

ANN HERRERA, as Administratrix of the  
Estate of ALCENTI MCINTOSH, Deceased;  
and Iasia Sweeting, as Personal Representative  
of ALCENTI MCINTOSH, Deceased;

Plaintiffs,

v.

EXTENDED STAY AMERICA, INC.,  
ESA MANAGEMENT, LLC,  
HVM L.L.C.,  
ESA PROPERTIES, L.L.C.,  
BRE/ESA PROPERTIES, L.L.C.,  
CALVIN MCINTOSH,  
ESA P PORTFOLIO, LLC,  
ESA P PORTFOLIO OPERATING LESSEE,  
LLC;

Defendants.

Civil Action  
File No. 16-C-01271-4  
  
Jury Trial Demanded

**CONSOLIDATED PRE-TRIAL ORDER**

The following constitutes a Pre-Trial Order entered in the above styled case after conference with counsel for the parties:

1.

The name, address and phone number of the attorneys who will conduct the trial are as follows:

**For Plaintiffs:**

Andrew T. Rogers  
Georgia Bar No. 007010  
Gilbert H. Deitch  
Georgia Bar No. 216400  
Kara E. Phillips  
Georgia Bar No. 379670  
W. Michael D'Antignac  
Georgia Bar No. 205714

DEITCH & ROGERS, LLC  
5881 Glenridge Drive  
Plaza 400, Suite 160  
Atlanta, GA 30328  
770-394-9000

Naveen Ramachandrappa  
Georgia Bar No. 422036  
BONDURANT MIXSON & ELMORE LLP  
1201 W Peachtree St NW Ste 3900  
Atlanta, GA 30309  
404-881-4100

**Extended Stay Defendants:** Patrick Moore, Christopher Byrd and Shubhra Mashelkar, and WEINBERG, WHEELER, HUDGINS, GUNN, & DIAL, LLC 3344 Peachtree Road NE, Suite 2400, Atlanta, Georgia 30326.

2.

The estimated time required for trial is:

**By Plaintiffs:** 4-5 days

**Extended Stay Defendants:** 8-10 days (including jury selection).

3.

The following motions are before the Court:

**By Plaintiffs:** Plaintiffs anticipate filing a motion to exclude testimony from Dr. Todd Antin.

**Extended Stay Defendants:**

1. Defendants Motion for Summary Judgment
2. Defendants Motion to Exclude Testimony by Expert Steve Eichel
3. Defendants Motion to Exclude evidence regarding “sex trafficking” or “sex trafficking” evidence
4. Defendants Motion to Exclude Prior Crime Evidence
5. Defendants Motion to Exclude Any Testimony of Evidence Concerning Post-Incident Conduct

6. Defendants Motion to Exclude Post Incident Policies/Procedures
7. Defendants Motion to Exclude Post-Incident Videos and Photographs Showing Iasia Sweeting's Physical Condition
8. Defendants Motion to Exclude Any Testimony or Evidence Regarding Crimes at other ESA Properties.
9. Defendants Motion to Exclude any Testimony or Evidence Regarding an Alias Used by Najlaa McIntosh
10. Defendants Motion to Exclude the Confession Recording of Najlaa McIntosh
11. Defendants Motion to Exclude any Arguments Regarding the Effect of Apportionment on Plaintiffs' Potential Award
12. Defendants' Motion to Consolidate

4.

The jury will be qualified as to relationship with the following:

**By Plaintiffs:**

- a) Defendant Extended Stay America, Inc.
- b) Defendant ESA Management, LLC
- c) Defendant HVM L.L.C.
- d) Defendant ESA Properties, L.L.C.
- e) Defendant BRE/ESA Properties, L.L.C.
- f) Defendant ESA P Portfolio, LLC
- g) Defendant ESA P Portfolio Operating Lessee, LLC
- h) Tony C. Jones
- i) Todd M. Ladouceur
- j) The law firm of GALLOWAY, JOHNSON, TOMPKINS, BURR & SMITH
- k) Christopher T. Byrd
- l) Patrick B. Moore
- m) Shubhra R. Mashelkar
- n) Robert P. Marcovitch
- o) George B. Green, Jr.
- p) The law firm of WEINBERG WHEELER HUDGINS GUNN & DIAL
- q) Defendant Calvin McIntosh
- r) Walter Britt
- s) CHANDLER BRITT & JAY, LLC
- t) Safety National Casualty Corp.
- u) Commerce & Industry Insurance Company
- v) American Guarantee and Liability Insurance Company
- w) Allied World National Assurance Company
- x) Federal Insurance Company
- y) The North River Insurance Company
- z) The American Insurance Company
- aa) Navigators Insurance Company

**Extended Stay Defendants:** All parties, non-parties under which Notices of Non-Party Fault and Intent to Apportion have been filed, witnesses, insurers, and counsel.

5.

(a) All discovery has been completed, unless otherwise noted, and the court will not consider any further motions to compel discovery except for good cause shown. The parties, however, shall be permitted to take depositions of any person(s) for the preservation of evidence for use at trial.

**The parties have a few depositions that are being scheduled outside the discovery cut-off deadline, by agreement.**

(b) Unless otherwise noted, the names of the parties as shown in the caption to this order are correct and complete and there is no question by any party as to the misjoinder or nonjoinder of any parties.

**Extended Stay Defendants:**

The names of the parties as set forth in the caption to this order are incorrect. It was made clear to Plaintiff, upon the deposition of Rabon Mayes, that the only cognizable Extended Stay entities with an interest in the above-styled civil action, are: ESA P Portfolio, LLC, ESA P Portfolio Operating Lessee, LLC, and ESA Management, LLC.

6.

The following is Plaintiffs' brief and succinct outline of the case and contentions: See Attachment "A-1".

7.

The following are Defendants' brief and succinct outline of the case and contentions:

Plaintiffs contend that Iasia Sweeting was kidnapped in 2010 by Calvin McIntosh and held prisoner at the Extended Stay America located at 7065 Jimmy Carter Boulevard, Norcross, Gwinnett County, Georgia 30092 (the “Premises”) for a period of four years. Plaintiffs further allege that, during this time, Ms. Sweeting was forcibly confined to her room by Mr. McIntosh and his adult daughter, Najlaa McIntosh, and his son, Khanowk McIntosh. There, according to Plaintiffs, Ms. Sweeting was tortured and raped, giving birth to two children. The younger of those two children is Decedent herein, Alcenti McIntosh, who Plaintiff contends was born at the Premises and confined in the very same room for her entire life. The evidence will show, however, that this narrative is woefully inaccurate. While Ms. Sweeting may have endured some abuse by the McIntoshes, she was identified as a runaway at the time of her “disappearance” and she had been in communication with Calvin McIntosh prior to consensually “running away” with him. Iasia Sweeting was seen numerous times on the Premises, by Hotel employees, and she appeared fine and never sounded any alarm. Likewise, over the course of her alleged captivity, Ms. Sweeting failed to inform police, EMTs, doctors and hospital staff that she had been kidnapped or was otherwise being held against her will. The evidence ultimately shows that Iasia Sweeting was never kidnapped or held captive, as Plaintiff contends, and that those on the outside of whatever relationship she had with the McIntoshes would not have suspected anything untoward. Further, the criminal activity, generally, occurring on the premises was in no way similar to the criminal abuse which culminated in Decedent’s death and did not serve to put the Defendants on notice that family abuse, culminating in the starvation death of an infant, was occurring or could occur at the premises. It is the perpetrators of that abuse, Calvin, Khanowk and Najlaa McIntosh that should be held liable for Decedent’s death. And, to the extent her own

negligence and willing participation contributed to Alcenti's neglect and ultimate death, Ms. Sweeting is also liable.

8.

Plaintiffs submit that the issues for determination by the jury are as follows:

- (a) Duty;
- (b) Breach of Duty;
- (c) Causation;
- (d) Damages.

**Extended Stay Defendants:**

Are the following persons and entities liable for Plaintiffs' general and special damages: Calvin McIntosh, Najlaa McIntosh, Khanowk McIntosh, Iasia Sweeting, Extended Stay Defendants?

If YES, what percentage of liability does each such person or entity have for Plaintiffs' general and special damages.

9.

The specifications of negligence including applicable code sections are as follows:

Plaintiffs submit that the specifications of *negligence* including applicable code sections, are as follows:

COUNT I. Negligence - Duty to Keep Premises Safe (O.C.G.A. § 51-3-1)

COUNT IV. False Imprisonment/Child Abuse and Neglect (O.C.G.A. §§ 51-7-20, 51-1-13, 51-1-14)

**Extended Stay Defendants:** Plaintiffs are not entitled to recover any damages against Extended Stay Defendants. Extended Stay Defendants did not proximately cause Decedent's injuries and damages, nor were the crimes committed against Decedent reasonably foreseeable to Extended

Stay Defendants. Plaintiffs' injuries and damages were proximately caused by, and should be apportioned to - Calvin McIntosh, Najlaa McIntosh, Iasia Sweeting, and Khanowk McIntosh.

O.C.G.A. § 51-12-33.

10.

If the case is based on a contract, either oral or written, the terms of the contract are as follows (or, the contract is attached as an exhibit to this Order): Not applicable.

11.

The types of damages and the applicable measure of those damages are stated as follows:

**By Plaintiffs:**

General damages, for the jury to determine in their enlightened conscience as fair and impartial jurors, (i) for Alcenti McIntosh's physical and emotional pain and suffering; (ii) for the full value of the life of Alcenti McIntosh.

**Extended Stay Defendants:** Not applicable.

12.

If the case involves divorce, each party shall present to the Court at the pre-trial conference the affidavits required by Rule 24.2. Not applicable.

13.

The following facts are stipulated: None at this time. The parties will confer to determine what facts, if any, can be stipulated.

14.

The following is a list of all documentary and physical evidence that may be tendered at the trial by Plaintiffs or Defendants. Unless noted, the parties have stipulated as to the authenticity of the documents listed and the exhibits listed may be admitted without further proof

of authenticity. To the extent possible, the exhibits shall be marked by counsel prior to trial so as not to delay the trial before the jury.

(a) **By Plaintiffs:** See Attachment “B-1”

(b) **By Defendants:**

*See attached Defendants Exhibit “A.”*

**By Plaintiffs and Defendants:**

Inclusion of any exhibit above is not an admission as to its admissibility or authenticity and such objections are expressly reserved. The parties may not tender all exhibits listed. The parties expressly reserve the right to supplement the above list prior to trial with adequate notice to the opposing party. Further, exhibits may be renumbered prior to trial. The parties have not seen all of the other parties’ potential exhibits and therefore cannot stipulate to their authenticity except as previously stipulated by the parties. The parties do not stipulate to the authenticity of any documents identified by the opposing party without first having the opportunity to review the proposed exhibit. The parties further object to any of the opposing party’s proposed exhibits that are not properly identified. The parties reserve the right to object to the admissibility of any document identified herein on any ground other than authenticity. Additionally, the parties reserve the right to object to any proposed documentary and/or physical evidence until it is properly authenticated and tendered. Further, the parties reserve the right to use impeachment materials and demonstrative aids as allowed by law without being listed herein.

15.

Special authorities relied upon by Plaintiffs relating to peculiar evidentiary or other legal questions are as follows: None at this time.



16.

Special authorities relied upon by Defendants relating to peculiar evidentiary or other legal questions are as follows:

1. See authorities cited and relied upon in Defendants' motion for summary judgment and various motions in limine;
2. O.C.G.A. § 51-12-33;
3. O.C.G.A. § 53-1-5;
4. O.C.G.A. § 16-5-70;

Defendants reserve the right to cite additional special authorities if further peculiar evidentiary or legal issues arise.

17.

All requests to charge anticipated at the time of trial will be filed in accordance with Rule 10.3.

**By Plaintiffs:** Unless otherwise ordered by the Court, Plaintiffs will submit proposed jury charges at the commencement of trial in accordance with Uniform State Court Rule 10.3 and pursuant to the Court's Scheduling Order. Plaintiffs reserve the right to file additional requests to charge as the evidence may dictate through the course of the trial.

**Extended Stay Defendants:** All requests to charge will be filed in accordance with Rule 10.3, as modified by this Court's Order of June 4, 2018.

18.

The testimony of the following persons may be introduced by depositions:

**By Plaintiffs:** See Attachment "C-1"

**Extended Stay Defendants:**

Extended Stay Defendants may present the following persons by depositions:

1. Khanowk McIntosh
2. Stephanie McIntosh
3. Jill Gates
4. Dawn Niles
5. Corienne Smith
6. Dr. William Carter
7. Omarra Swain
8. Zelian Steward

**By Plaintiffs and Defendants:**

The parties reserve the right to identify persons whose testimony may be introduced by depositions and reserve the right to object to any deposition designations submitted by the opposing party. Any objection to the depositions or questions or arguments in the depositions shall be called to the attention of the court prior to trial.

19.

- (a) Plaintiffs will have present at trial: See Attachment “D-1”
- (b) Plaintiffs may have present at trial: See Attachment “D-1”

Plaintiffs reserve the right to amend this list of witnesses and may do so by giving reasonable notice prior to trial of any such additional witnesses to opposing counsel.

c. **Extended Stay Defendants WILL have present at trial:**

None.

d. **Extended Stay Defendants MAY have present at trial:**

*See* Extended Stay Defendants' List attached as Exhibit "B."

**By Plaintiffs and Defendants:**

The parties reserve the right to call any additional witnesses whose names are provided to the opposing party in advance of trial.

Opposing counsel may rely on representation by the designated party that he/she/they will have a witness present unless notice to the contrary is given in sufficient time prior to trial to allow the other party to subpoena the witness or obtain his testimony by other means.

20.

The form of all possible verdicts to be considered by the jury are as follows:

**By Plaintiffs:** Pursuant to the Court's Scheduling Order, Plaintiffs request that they be allowed to submit their proposed verdict form at the close of all evidence

**Extended Stay Defendants:**

Defendants will submit all possible verdicts to be considered by the jury at the commencement of the trial of this action.

21.

- (a) The possibilities of settling this case are poor.
- (b) The parties do want the case reported.
- (c) The parties agree to share equally the cost of take-down.
- (d) Other matters: None at this time.

Respectfully submitted, this 23<sup>rd</sup> day of October, 2018.

By:/s/ W. Michael D'Antignac

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**STATE COURT OF GWINNETT COUNTY  
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ANN HERRERA, as Administratrix of the  
Estate of ALCENTI MCINTOSH, Deceased;  
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EXTENDED STAY AMERICA, INC.,  
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BRE/ESA PROPERTIES, L.L.C.,  
CALVIN MCINTOSH,  
ESA P PORTFOLIO, LLC,  
ESA P PORTFOLIO OPERATING LESSEE,  
LLC, and JOHN DOES NOS. 3-5;

Defendants.

Civil Action  
File No. 16-C-01271-4

Jury Trial Demanded

**PRE-TRIAL ORDER**

It is hereby ordered that the foregoing, including the attachments thereto, constitutes the Pre-Trial Order in the above case and supersedes the pleadings which may not be further amended except by order of the Court to prevent manifest injustice.

This \_\_\_\_ day of October, 2018.

\_\_\_\_\_  
Joseph C. Iannazzone  
Judge, State Court of Gwinnett County

### **Plaintiffs' Outline of the Case and Contentions**

This action arises out of the abuse, starvation, and death of a baby named Alcenti McIntosh in a hotel room at the Extended Stay America hotel located at 7065 Jimmy Carter Boulevard, Norcross, Georgia 30092 (the "Hotel"). Alcenti was born in Room 310 of the Hotel, was abused in the room, and eventually starved to death in the room. Alcenti was 15 months-old and weighed seven-and-a-half pounds when she died. She had also suffered rib and arm fractures while living in the hotel room.

The Hotel was owned, operated, and managed by Defendants Extended Stay America, Inc., ESA Management, LLC, HVM L.L.C., ESA Properties, L.L.C., BRE/ESA Properties, L.L.C., ESA P Portfolio, LLC, and ESA P Portfolio Operating Lessee, LLC (the "Extended Stay Defendants"). Plaintiffs contend that Alcenti's injuries, pain and suffering, and death were caused by the Extended Stay Defendants' failure to exercise ordinary care to keep their premises safe, including but not limited to, repeatedly and knowingly failing to comply with and enforce their internal policies designed to ensure the safety and security of their guests at the Hotel, including Alcenti, failing to adequately train their employees, and failing to investigate dangers made known to them.

## DOCUMENTS IDENTIFIED AND PRODUCED BY THE ESA DEFENDANTS

All documents produced by the ESA Defendants, including but not limited to:

<b><u>Bates Stamp</u></b>	<b><u>Description &amp; Dates</u></b>
ESA 000001 – 103	Internal Incident Reports & Emails (2011)
ESA 000104 – 230	Internal Incident Reports & Emails (2012)
ESA 000231 – 268	Internal Incident Reports & Emails (2014)
ESA 000270 – 275	Incident Report (1/10/14)
ESA 000276 – 334	Housekeeping Records (March 2011)
ESA 000335 – 429	Housekeeping Records (April 2012)
ESA 000430 – 542	Housekeeping Records & Audit Documents (March 2012)
ESA 000543 – 612	Housekeeping Records (February 2012)
ESA 000613 – 717	Housekeeping Records (August 2012)
ESA 000718 – 817	Housekeeping Records (July 2012)
ESA 000818 – 864	Housekeeping Records (December 2012)
ESA 000865 – 930	Housekeeping Records (November 2011)
ESA 000930 – 995	Housekeeping Records (October 2011)
ESA 000996 – 1054	Housekeeping Records (September 2011)
ESA 001055 – 1139	Housekeeping Records (January 2012)
ESA 001140 – 1189	Housekeeping Records (February 2011)
ESA 001189 – 1238	Housekeeping Records (December 2010)
ESA 001239 – 1305	Housekeeping Records (November 2010)
ESA 001306 – 1398	Housekeeping Records (October 2010)
ESA 001399 – 1465	Housekeeping Records (September 2010)
ESA 001466 – 1504	Housekeeping Records (August 2010)
ESA 001505 – 1594	Housekeeping Records (August 2011)
ESA 001595 – 1662	Housekeeping Records (July 2011)
ESA 001663 – 1728	Housekeeping Records (June 2011)
ESA 001729 – 1808	Housekeeping Records & Audit Docs. (May 2011)
ESA 001809 – 1871	Housekeeping Records (April 2011)
ESA 001872 – 1960	Housekeeping Records (January 2011)
ESA 001961 – 2024	Housekeeping Records (December 2012)
ESA 002025 – 2094	Housekeeping Records (November 2012)
ESA 002095 – 2164	Housekeeping Records & Audit Report (September 2012)
ESA 002165 – 2213	Housekeeping Records (September 2012)
ESA 002214 – 2309	Housekeeping Records (June 2012)
ESA 002310 – 2409	Housekeeping Records (May 2012)
ESA 002410 – 2518	Housekeeping Records (March 2014)
ESA 002519 – 2596	Housekeeping Records (August 2013)
ESA 002597 – 2677	Housekeeping Records (July 2013)
ESA 002678 – 2732	Housekeeping Records (June 2013)

ESA 002733 – 2799	Housekeeping Records (May 2013)
ESA 002800 – 2862	Housekeeping Records (February 2013)
ESA 002863 – 2942	Housekeeping Records (January 2013)
ESA 002943 – 3014	Housekeeping Records (November 2014)
ESA 003015 – 3091	Housekeeping Records (October 2014)
ESA 003092 – 3174	Housekeeping Records and Audit Docs. (September 2014)
ESA 003175 – 3284	Housekeeping Records (August 2014)
ESA 003285 – 3351	Housekeeping Records (February 2014)
ESA 003352 – 3437	Housekeeping Records (July 2014)
ESA 003438 – 3517	Housekeeping Records (June 2014)
ESA 003518 – 3612	Housekeeping Records (May 2014)
ESA 003613 – 3689	Housekeeping Records (October 2010)
ESA 003690 – 3773	Housekeeping Records (January 2014)
ESA 003774 – 3874	Housekeeping Records (December 2013)
ESA 003875 – 3958	Housekeeping Records (November 2013)
ESA 003959 – 4038	Housekeeping Records (April 2013)
ESA 004039 – 4130	Housekeeping Records (March 2013)
ESA 004131 – 4203	Housekeeping Records (October 2013)
ESA 004204 – 4267	Housekeeping Records (September 2013)
ESA 004268 – 4272	Incident Report (4/22/14)
ESA 004273 – 4277	Incident Report (9/3/13)
ESA 004278 – 4278	Incident Report (4/27/12)
GAP	
ESA 004280 – 4284	Incident Report (7/27/12)
ESA 004285 – 4289	Incident Report (9/18/13)
ESA 004290 – 4294	Incident Report (9/30/13)
ESA 004295 – 4299	Incident Report (9/29/13)
ESA 004300 – 4300	Incident Report (9/26/14)
ESA 004301 – 4509	Kaizen Training and Standards Manual (4/1/14)
ESA 004510 – 004511	“If You Find a Fire” Poster
ESA 004512 – 4678	Expense/Work Schedule/Incident Reports/Performance Documents (February 2011)
ESA 004679 – 4918	Expense/Work Schedule/Incident Reports/Performance Documents (April 2011)
ESA 004919 – 5068	Expense/Work Schedule/Incident Reports/Performance Documents (May 2011)
ESA 005069 – 5729	Expense/Work Schedule/Incident Reports/Performance Documents (June 2011)
ESA 005280 – 5477	Expense/Work Schedule/Incident Reports/Performance Documents (September 2011)
ESA 005478 – 5667	Expense/Work Schedule/Incident Reports/Performance Documents (October 2011)



ESA 005668 – 5850	Expense/Work Schedule/Incident Reports/Performance Documents (November 2011)
ESA 005851 – 6022	Expense/Work Schedule/Incident Reports/Performance Documents (December 2011)
ESA 006023 – 6038	Cash Drawer Logs (3/7/11 – 10/12/11)
ESA 006039 – 6284	Schedules & Time Off Requests (2011)
ESA 006285 – 6458	Expense/Work Schedule/Incident Reports/Performance Documents (January 2011)
ESA 006459 – 6770	Guest Registration Cards (December 2012)
ESA 006771 – 7044	Guest Registration Cards (November 2012)
ESA 007045 – 7652	Guest Registration Cards (August – September 2012)
ESA 007653 – 8289	Guest Registration Cards (October 2012)
ESA 008290 – 8711	Guest Registration Cards (July 2012)
ESA 008712 – 9185	Guest Registration Cards (March/April 2013)
ESA 009186 – 9794	Guest Registration Cards (May 2013)
ESA 009795 – 9804	Guest Registration Cards (7/12/13 & 11/29-30/13)
ESA 009805 – 10336	Guest Registration Cards (March 2013)
ESA 010337 – 11005	Guest Registration Cards (February 2013)
ESA 011006 – 11427	Guest Registration Cards (January 2013)
ESA 011428 – 12028	Guest Registration Cards (June 2013)
ESA 012029 – 12273	Guest Registration Card (Room 207 – August 2012)
ESA 012274 – 12557	Guest Registration Cards (August/September 2013)
ESA 012558 – 12864	Guest Registration Cards (July/August 2013)
ESA 012865 – 13157	Guest Registration Cards (August 2013)
ESA 013158 – 13407	Guest Registration Cards (August 2013)
ESA 013408 – 13641	Guest Registration Cards (September 2013)
ESA 013642 – 14025	Guest Registration Cards (October 2013)
ESA 014026 – 14162	Guest Registration Cards (Random 2007-2010)
ESA 014161 – 14748	Guest Registration Cards (October/November 2013)
ESA 014749 – 14973	Guest Registration Cards (September/October 2013)
ESA 014974 – 15067	Guest Registration Cards (September 2013)
ESA 015068 – 15342	Guest Registration Cards (June-September 2013)
ESA 015343 – 15693	Guest Registration Cards (September 2013)
ESA 015694 – 15724	Zurich Acknowledgements of Claims
ESA 015725 – 15762	Blood Borne Pathogen Exposure Control Plan
ESA 015763 – 15849	ESH General Liability/Guest Incident Reports
ESA 015850 – 15907	ESA Emergency Response Procedures
ESA 015908 – 15911	ESH General Liability/Guest Incident Reports
ESA 015912 – 15915	First Amendment to Lease Agreement Between ESA P Portfolio L.L.C, ESA P Portfolio MD Trust, ESH/TN Properties LLC and ESA P Portfolio Operating Lessee Inc. (April 9, 2012)

ESA 015916 – 15919	First Amendment to Management Agreement Between ESA P Portfolio Operating Lessee Inc. and HVM L.L.C. (April 9, 2012)
ESA 015920 – 15924	First Amendment to Management Agreement Between ESA P Portfolio Operating Lessee LLC and ESA Management LLC (July 28, 2014)
ESA 015925 – 15930	Fourth Amendment to Lease Agreement Between ESA P Portfolio L.L.C, ESA P Portfolio MD Trust, ESH/TN Properties LLC and ESA P Portfolio Operating Lessee Inc. (April 15, 2013)
ESA 015936 – 16112	Guest Services Representative Reference Binder
ESA 016113 – 19256	Guest Registration Cards (August 2011 – May 2012)
ESA 019257 – 19509	Guest Registration Cards (October – December 2010)
ESA 019510 – 19621	Guest Registration Cards (December 2010)
ESA 019622– 19978	Guest Registration Cards (January – February 2011)
ESA 019979 – 20454	Guest Registration Cards (February – April 2011)
ESA 020455 – 20762	Guest Registration Cards (March – April 2011)
ESA 020763 – 21100	Guest Registration Cards (May 2011)
ESA 021101 – 21482	Guest Registration Cards (June 2011)
ESA 021483 – 21635	Guest Registration Cards (December 2010 – January 2011)
ESA 021636 – 21770	Guest Registration Card and Receipts (10/25/08)
ESA 021771 – 22034	Guest Registration Cards (January 2011)
ESA 022035 – 22273	Guest Registration Cards (April 2010)
ESA 022274 – 22525	Guest Registration Cards (March 2010)
ESA 022526 – 22859	Guest Registration Cards (December 2009)
ESA 022860 – 23228	Guest Registration Cards (February 2010)
ESA 023229 – 23494	Guest Registration Cards (March 2010)
ESA 023495 – 23867	Guest Registration Cards (January 2010)
ESA 023868 – 23982	Guest Registration Cards (April 2010)
ESA 023983 – 24241	Guest Registration Cards (November 2009)
ESA 024242 – 24276	Guest Registration Cards (April - May 2009)
ESA 024277 – 24354	Guestroom PM Deficiency Log
ESA 024355 – 24367	Hazard Communication Program Manual
ESA 024368 – 24418	Management Agreement Between ESA P Portfolio Operating Lessee, LLC and ESA Management, LLC (November 11, 2013)
ESA 024419 – 24468	Management Agreement Between ESA P Portfolio Operating Lessee, Inc. and HVM, LLC (October 8, 2010)
ESA 024469 – 25600	Personnel Files
ESA 025601 – 25692	Lease Agreement Between ESA P Portfolio L.L.C., ESA P Portfolio MD Trust, ESH/TM Properties L.L.C. and ESA P Portfolio Operating Lessee Inc. (October 8, 2010)
ESA 025693 – 25764	Safety and Security Handbook

ESA 025765 – 25772	Sales Forecast (2010)
ESA 025773 – 25780	Sales Forecast (2011)
ESA 025781– 25788	Sales Forecast (2012)
ESA 025789 – 25796	Sales Forecast (2013)
ESA 025797 – 25804	Sales Forecast (2014)
ESA 025805 – 25808	Second Amendment to Lease Agreement Between ESA P Portfolio L.L.C., ESA P Portfolio MD Trust, ESH/TM Properties L.L.C. and ESA P Portfolio Operating Lessee Inc. (November 30, 2012)
ESA 025809 – 25815	Agreement Regarding Management Agreement Between ESA P Portfolio Operating Lessee LLC and ESA Management, LLC (December 8, 2015)
ESA 025816 – 25820	Third Amendment to Lease Agreement Between ESA P Portfolio L.L.C., ESA P Portfolio MD Trust, ESH/TM Properties L.L.C. and ESA P Portfolio Operating Lessee Inc. (December 13, 2012)
ESA 025821 – 25875	Lease Agreement Between ESA UD Properties L.L.C. and ESA 2007 Operating Lessee Inc. (October 8, 2010)
ESA 025876 – 027730	November 2014 Audit Packets
No Bates Label	2011 – 2014 Audit Packets
ESA 027827 - 027944	PERSONNEL FILE – Denise Ross
ESA 027945 – 027992	PERSONNEL FILE – Antwannet Thomas
ESA 027993 – 028065	Transcript of Blood Borne Pathogen Training
ESA 028066 – 028095	Transcript of Fire Safety Training
ESA 028096 – 028171	Transcript of Hazard Communications Training
ESA 028172 – 028298	Transcript of Hotel Security Procedures Training
ESA 028299 – 028327	Transcript of Injury Illness Prevention Program
ESA 028328 – 028349	Transcript of Lock Out Training
ESA 028350 – 028374	MISSING
ESA 028375 – 028424	Medallia Site Survey Responses
ESA 028425 – 028449	Customer Care Survey Responses
ESA 028450 – 028539	Index to Safety & Security Handbook
ESA 028540 – 028541	Hotel Manager’s Security Checklist
ESA 028542 – 025843	Studio Lay Outs of Rooms
ESA 028544 – 028750	Extended Stay Emergency Procedures Manual (Old Emergency Manual – Revised 8/05)
ESA 028751 – 028821	Green Shield Manual
ESA 028822 – 028858	GSR Reference Binder
ESA 028859 – 028890	Emergency Response Procedures Handbook
ESA 028891	Third Party Credit Card Authorization
ESA 028892 – 028895	Safety Watch Rules

ESA 028894 – 028910	MISSING
ESA 028911 – 028936	Injury Illness Prevention Program
ESA 028937 – 029014	Room Inspection & Battery Replacement Logs
ESA 029015 – 029025	Tourist Accommodation Inspection Record
ESA 029026 – 029098	Safety & Security Handbook
ESA 029099 – 029154	Extended Stay America Associate Handbook
ESA 029155 – 029157	Camera Work Order 11/10/14
(No Bates Label)	Video – Extended Stay Sex Trafficking – Revised
ESA 029158 – 029163	MISSING
ESA 029164 – 029169	Gwinnett PD Security Services Agreement – David Richard
ESA 029170 – 029175	Gwinnett PD Security Services Agreement – Jose Collazo
ESA 029176 – 029181	Gwinnett PD Security Services Agreement – Matthew Williamson
ESA 029182 – 029187	Gwinnett PD Security Services Agreement – Seth Bailey
ESA 029188 – 029344	Expense Reports for November 2010
ESA 029345 – 029502	Expense Reports for October 2010
ESA 029503 – 029702	Expense Report for September 2010
ESA 029703 – 029756	Cash Drawer Log
ESA 029757 – 029865	Expense Reports for December 2010
ESA 029866 – 030094	Expense Reports for July 2010
ESA 030095 – 030278	Expense Reports for May 2010
ESA 030279 – 030461	2010 Work Schedule
ESA 030462 – 030663	Expense Reports for April 2010
ESA 030664 – 030732	Expense Reports for May 2010
ESA 030733 – 030913	MMS Surveys 2010
ESA 030914 – 030986	Expense Reports for November 2010
ESA 030987 – 031265	Expense Reports for August 2010
ESA 031266 – 031508	Expense Reports for February 2010
ESA 031509 – 031739	Expense Reports for January 2010
ESA 031740 – 031954	Expense Reports for June 2010
ESA 031955 – 032208	Expense Reports for March 2010
ESA 032209 – 032320	Expense Reports for October 2010
ESA 032321 – 032420	Expense Reports for September 2010
ESA 032421 – 032569	December 2014 Expenses
ESA 032570 – 032723	MISSING
ESA 032724 – 032962	September 2013 Monthly Expense Reports
ESA 032963 – 033248	January 2013 Monthly Expenses
ESA 033249 – 033383	May 2014 Monthly Expenses
ESA 033384 – 033612	October 2013 Monthly Expenses
ESA 033613 – 033834	March 2014 Monthly Expenses
ESA 033835 – 033975	January 2014 Monthly Expenses
ESA 033976 – 034165	March 2013 Monthly Expenses

ESA 034166 – 034393  
ESA 034394 – 034459  
ESA 034460 – 034468

August 2011 Expenses – Work Schedules  
Receipt for Room 318 from 8/24/10 until arrest  
Security Officers Invoice Info

No Bates Label

Grady Hospital & Ann C. Schwartz, M.D.F.A.P.M.  
(175 pages of records)

No Bates Label

Academy for Family Empowerment, Inc. documents  
CCFA 1– Comprehensive Child & Family Assessment  
CCFA 2 – Assessment – Florence McIntosh  
CCFA 3 – Genogram

ExtendedStayAmerica 000001 – 000046

Police Reports related to Elvis Morgan, Iasia  
Sweeting

ExtendedStayAmerica 000047 - 000048

Marriage License Application

ExtendedStayAmerica 000049 - 000050

Extended Stay America – Program Overview  
– Prostitution & Human Sex Trafficking SOP

ExtendedStayAmerica 000051 – 000212

Orkin Receipts

ExtendedStayAmerica 000213 – 000222

Orkin Receipts

ExtendedStayAmerica 000223 – 000289

Incident Reports

ExtendedStayAmerica 000290 – 000309

Northside Hospital

ExtendedStayAmerica 000310 – 000329

Emory Midtown – billing records

ExtendedStayAmerica 000330 – 000354

EMS Records

ExtendedStayAmerica 000355 – 000369

Grady – billing records

ExtendedStayAmerica 000370 – 000379

Northside Hospital – billing records

ExtendedStayAmerica 000380 – 000381

Odyssey (Cert. of Records)

ExtendedStayAmerica 000382 – 000401

Odyssey

ExtendedStayAmerica 000402 – 000427

Piedmont – billing records

ExtendedStayAmerica 000428 – 001491

Piedmont

ExtendedStayAmerica 001492 – 001622

Riverwood

ExtendedStayAmerica 001623 – 001775

Wellspring

NO BATES STAMP

ESA Gwinnett Place 6.11.10 – 9.9.10 (hotel  
receipts – Calvin McIntosh)

ExtendedStayAmerica 001776 – 001922

Families First Records

ExtendedStayAmerica 001923 – 001965

ViewPoint Records

ExtendedStayAmerica 001966 – 002050

CDM.IKS. GMC Records 7.29.13 (Segment  
1)

**ATTACHMENT B-1**

ExtendedStayAmerica 001966 – 002050	CDM.IKS. GMC Records 7.29.13 (Segment 2)
ExtendedStayAmerica 001966 – 002050	CDM.IKS. GMC Records 7.29.13 (Segment 3)
ExtendedStayAmerica 001966 – 002050	CDM.IKS. GMC Records 7.29.13 (Segment 4)
ExtendedStayAmerica 001966 – 002050	CDM.IKS. GMC Records 7.29.13 (Segment 5)
ExtendedStayAmerica 002051	Photo of Iasia Sweeting
ExtendedStayAmerica 002052 – 002053	Registration Card & ID – Najlaa McIntosh
ExtendedStayAmerica 002054 – 002056	Folio for 318 (w-note re. calls)
ExtendedStayAmerica 002057 – 002064	Receipts signed by Khanowk
ExtendedStayAmerica 002065 – 002330	Receipts signed by Najlaa McIntosh
ExtendedStayAmerica 002331	ESA Automobile incident report letter
ExtendedStayAmerica 002332 – 002341	ESA – Pre-Hire Actions
ExtendedStayAmerica 002342 – 002350	ESA – Creating a Requisition
ExtendedStayAmerica 002351 – 002355	ESA – Overview of the Recruitment Process
ExtendedStayAmerica 002356 – 002362	ESA – ADP Recruitment – Tax Credits
ExtendedStayAmerica 002363 – 002368	ESA – Reviewing Candidates
ExtendedStayAmerica 002369 – 002374	ESA – Formal Interview Process for Salaried Positions
ExtendedStayAmerica 002375	ESA – Approving an Offer
ExtendedStayAmerica 002376 – 002378	ESA – Approving a Requisition
ExtendedStayAmerica 002379 – 002451	BBP Training (8-2015) (blood borne pathogen)
ExtendedStayAmerica 002452 – 002453	Bed Sign Survey – ExtendedStayHotels – Atlanta Peachtree Corners
ExtendedStayAmerica 002454	Bed Bug Checklist
ExtendedStayAmerica 002455 – 002461	Bed Bug Protocol – March 2011
ExtendedStayAmerica 002462 – 002464	Bed Bug Protocol Revised 70809
ExtendedStayAmerica 002465 – 002466	ESA – Boarding a Candidate
ExtendedStayAmerica 002467 – 002471	Broadspire Incident Report – Jan. 2015 (bed bugs)
ExtendedStayAmerica 002472 – 002476	Broadspire Incident Report – Nov. 2014 (picture frame fell off & hit person in head)
ExtendedStayAmerica 002477	Calvin George – Bank Account Authorization
ExtendedStayAmerica 002478	Certificate of Insurance Request Form – Hotel Property Insurance (blank form)
ExtendedStayAmerica 002479	Certificate of Insurance Request Form – Company Owned or Leased Vehicle (blank)
ExtendedStayAmerica 002480	Certificate of Insurance – Request Form – Non-Vehicle (blank)

ExtendedStayAmerica 002481	Certificate of Insurance Request Form – General Liability, Workers’ Compensation (blank)
ExtendedStayAmerica 002482	CHARTIS – Workers’ Comp New Claim Acknowledgement – 10/8/13 – A.Thomas (ladder hit her in side of head)
ExtendedStayAmerica 002483	CHARTIS – General Liability New Claim Acknowledgment – 10/7/13 – Guest advised child start breaking out in bumps
ExtendedStayAmerica 002484	CHARTIS – General Liability New Claim Acknowledgement – 9/25/13 – Housekeeper stole from guest
ExtendedStayAmerica 002485	CHARTIS – General Liability New Claim Acknowledgement – 7/22/13 – Guest slip on flr after it was mopped.
ExtendedStayAmerica 002486	CHARTIS – General Liability New Claim Acknowledgement – 9/25/13 – Housekeeper stole from guest.
ExtendedStayAmerica 002487	DO NOT RENT LIST – Confidential – March 2010
ExtendedStayAmerica 002488 – 002491	ESA – Creating & Sending an Offer
ExtendedStayAmerica 002492	“DO NOT RENT” List Guidelines – July 2006
ExtendedStayAmerica 002493	DO NOT RENT LISTING – Confidential – October 2007
ExtendedStayAmerica 002494	Employee Injury Report 9-11 (blank)
ExtendedStayAmerica 002495	Employee Injury Report 11-23-14 – Pandora Thomas, struck with needle while taking out trash
ExtendedStayAmerica 002496	Employee Injury Report August 2009 (blank)
ExtendedStayAmerica 002497 – 002500	ESH Liability-Auto-Crime Incident Report 5-2011 (blank)
ExtendedStayAmerica 002501 – 002506	ESH Liability-Auto-Crime Incident Report 63009 (blank)
ExtendedStayAmerica 002507 – 002510	ESH Liability-Auto-Crime Incident Report Rev. 09-2011 (blank)
ExtendedStayAmerica 002511 – 002516	ESH Liability-Auto-Crime Incident Report – Room 107, Ms. Geddis, stolen vehicle, May 3, 2010
ExtendedStayAmerica 002517	Extended Stay Hotels Injury Free Program – Injury Free 3 <sup>rd</sup> Quarter
ExtendedStayAmerica 002518 – 002519	Extended Stay List of Past & Present Employees

ExtendedStayAmerica 002520 – 002522	Extended Stay Hotels – Workers’ Compensation Policy
ExtendedStayAmerica 002523 – 002552	Fire Safety (04-2016)
ExtendedStayAmerica 002553 – 002554	Hotel Property Damage Report (blank form)
ExtendedStayAmerica 002555 – 002556	Hotel Property Damage Report (blank form)
ExtendedStayAmerica 002557 – 002683	Hotel Security – Manager Course (04-2016)
ExtendedStayAmerica 002684 – 002689	ESA Incident Report – 4/18/12 – Guest fell on mat landed on his back
ExtendedStayAmerica 002690	ESA Incident Report – (no date) baby breaking out in bumps
ExtendedStayAmerica 002691 – 002694	ESA Incident Report form (blank)
ExtendedStayAmerica 002695 – 002698	ESA Incident Report – 5/14/12 – 2 shirts stolen out of dryer
ExtendedStayAmerica 002699 – 002702	ESA Incident Report – 11/17/11 – bed bugs
ExtendedStayAmerica 002703 – 002704	Claim Reporting Information – Employee Injury – Guest Incident – ESH Property Damage
ExtendedStayAmerica 002705 – 002723	Incident Reports from flash drive given to us by Darryle Taylor 11/15/12 – Assault in Room 219 3/19/13 – Tires stolen off work truck 8/17/11 – Homeland Security looking about 3 former guests (Nakia Brown, Angela Avery & Melody Lockett) 10/7/12 – Guest of Mr. Moore in altercation w/her boyfriend, police called. 7/27/11 – Clean up quote – Guest gave birth in Room 102
ExtendedStayAmerica 002724 – 002729	ESA Incident Report – 4/18/12 – Smoke coming from room 220, food left on stove
ExtendedStayAmerica 002730 – 002733	ESA Incident Report – 1/4/12 – Dispute over account with Room 205
ExtendedStayAmerica 002734 – 002739	ESA Incident Report – 7/16/12 – Room 311 complaining about guy w/large dog in Room 117
ExtendedStayAmerica 002740	ESA Incident Report – 10/11/12 – Theft from Room 222
ExtendedStayAmerica 002741 – 002756	Injury Free Hotels – Spreadsheet
ExtendedStayAmerica 002757 – 002759	New Associate ESU Course Requirements
ExtendedStayAmerica 002760 – 002763	New Associate Training SOP (Southeast Division)
ExtendedStayAmerica 002764 – 002766	Steritech – Pest Prevention Service Report 3/4/14





















ExtendedStayAmerica 002767 – 002769	ESA – Quick Interview Process for hourly positions
ExtendedStayAmerica 002770 – 002781	Broadspire Incident Report – 4/17/15 – Damage to guest’s vehicle in parking lot
ExtendedStayAmerica 002782 – 002791	Broadspire Incident Report – 11/10/14 – Guest bite by spider having reaction
ExtendedStayAmerica 002792 – 002847	Training Checklists received from Darryle Taylor
ExtendedStayAmerica 002848	Extended Stay Hotels – Workers’ Compensation Claim Procedures Non-Monopolistic States
ExtendedStayAmerica 002849	Extended Stay Hotels – Workplace Crisis Services
ExtendedStayAmerica 002850 – 002916	Saturday, 8/14/2010, Audit Packet
ExtendedStayAmerica 002917 – 003019	12/20/12 Audit Packet
ExtendedStayAmerica 003020 – 003113	Friday, 12/21/12, Audit Packet
ExtendedStayAmerica 003114 – 003209	Saturday, 12/22/12, Audit Packet
ExtendedStayAmerica 003210 – 003369	July 2011 Expenses & Work Schedules
ExtendedStayAmerica 003370 – 003524	March 2011 Expenses & Work Schedules
ExtendedStayAmerica 003525 – 003529	Broadspire Incident Report – 11/13/14 – Najlaa McIntosh – GPD to investigate room 310
ExtendedStayAmerica 003530	ESA Guest Incident/Property Damage/Crime Incident Report (blank)
ExtendedStayAmerica 003531	Inform Field User Intake – Risk Management Issues
ExtendedStayAmerica 003532 – 003535	ESA – How to Report Guest Incidents & Claims – Revised 1/5/05
ExtendedStayAmerica 003536	Incident Report Quick Reference
ExtendedStayAmerica 003537	Incident Report Quick Reference Revised 70909
ExtendedStayAmerica 003538	ESA – Reporting Evictions & INFORM Incidents
ExtendedStayAmerica 003539	ESA – Law Enforcement Incident Reporting Form (blank)
ExtendedStayAmerica 003540 – 003547	ESA – Manager’s Action Guide for Guest Issues
ExtendedStayAmerica 003548	ESA – Memo re. Legal Documents
ExtendedStayAmerica 003549 – 003561	Email – 5/18/16 – ORR for any records/reports to police investigation at Extended Stay Hotel on 11/11/14 w/corresponding police reports
ExtendedStayAmerica 003562 – 003719	ESH Safety-Security Module 2.28.13
























ExtendedStayAmerica 003720 – 003803	ESH Safety Training Module
ExtendedStayAmerica 003804 – 003878	Emergency Response Manual 032013
ExtendedStayAmerica 003879 – 003953	Emergency Response Manual 042013
ExtendedStayAmerica 003954 – 004041	Emergency Response Manual – RED BOOK 1-01-10
ExtendedStayAmerica 004042 – 004217	Housekeeping Final Master2 (Training Manual)
ExtendedStayAmerica 004218– 004405	Atlanta Medical Center – Medical Records for Iasia Sweeting
ExtendedStayAmerica 004406 – 006538	Gwinnett Medical Center – Medical Records for Iasia Sweeting
ExtendedStayAmerica 006539	CIOX Invoice – Piedmont Hospital
ExtendedStayAmerica 006540	CIOX Invoice – Piedmont Hospital
ExtendedStayAmerica 006541 – 006546	Wyndham Hotel & Resorts response to Request for records related to Calvin, Najlaa, Khanowk or Jacqueline Crossland – No records found
ExtendedStayAmerica 006547	Wingate by Wyndham – Duluth – Calvin McIntosh, stayed on 6/10/10 – 6/11/10
ExtendedStayAmerica006548 – 006550	Wingate by Wyndham – Duluth – Calvin McIntosh, stayed 5/29/10 – 6/11/10
ExtendedStayAmerica 006551	Wingate by Wyndham – Duluth – Calvin McIntosh 6/7/10 – 6/9/10
ExtendedStayAmerica 06552 – 006581	Academy for Family Empowerment – Comprehensive Child & Family Assessment (all 3 kids)
ExtendedStayAmerica 006582 – 006607	Academy for Family Empowerment – Comprehensive Child & Family Assessment – Florence McIntosh
ExtendedStayAmerica 006608 – 006627	Genogram
ExtendedStayAmerica 006628 – 006673	DDS Instructor Training Guide
ExtendedStayAmerica 006674 – 006729	DDL Participant Guide
ExtendedStayAmerica 006730 – 006740	DDS – Iasia Sweeting Documents
ExtendedStayAmerica 006741 – 006743	DKPD Report 05-147401 (10/28/05) Elvis Morgan– Simple Assault/Harassing Phone Calls (Suspect Douglas Hampton)
ExtendedStayAmerica 006744 – 006748	DKPD Report 08-033958 (3/13/08) Elvis Morgan – Stolen Vehicle
ExtendedStayAmerica 006749 – 006753	DKPD Report 08-151837 (11/9/08) Elvis Morgan - Theft by Deception (Suspect: Roy Hill)

ExtendedStayAmerica 006754 – 006757	DKPD Report 09-031300 (3/6/09) Homer Jackson – Stolen Vehicle (Suspect; Elvis Morgan)
ExtendedStayAmerica 006758 – 006759	DKPD Report 10-043451 (4/12/09) Elvis Morgan – Runaway Juvenile (Iasia Sweeting)
ExtendedStayAmerica 006760 – 006761	DKPD Report 16-062704 (6/29/16) Elvis Morgan – Financial Transaction Fraud (Suspect: Carla Jones)
ExtendedStayAmerica 006762 – 006763	Case Information – D0134914 (9/23/02) <u>State v. Elvis Morgan</u>
ExtendedStayAmerica 006764 – 006767	Failure to Appear; Probation Violation; Case Information – 94D09289 (11/7/94) <u>AA Enterprises v. Douglas Hampton, et al</u>
ExtendedStayAmerica 006768 – 06771	State Dispossession–Non-payment Rent Accusation 97-CR 4504-01 (July 1997) <u>State v. Kimberly Morgan</u> (DeKalb County)
ExtendedStayAmerica 006772 – 06777	Forgery (Elvis Morgan a/k/a Kimberly Morgan) Criminal History Record 10/3/18 Elvis Morgan
ExtendedStayAmerica 006778 – 006790	Gwinnett County Police Department CAD Reports – 7065 Jimmy Carter Blvd 7/20/13 – 8/8/13 (Around time of Alcenti’s birth)
ExtendedStayAmerica 006791 – 006792	Gwinnett County – Case Search <u>State v. Morgan</u>
ExtendedStayAmerica 006793 – 008045	Case No. 02W-14368 (Fraud) CIOX – Emory University Hospital Midtown – medical records for IASIA SWEETING (for dates 8/4/17 – 8/16/17, 4/23/17 – 4/28/17, 2/8/16)
ExtendedStayAmerica 008046 – 008151	Georgia Promised Land Women’s Center – Dr. Keisha McEwen – Medical Records for IASIA SWEETING for 1/1/15 – 8/7/18
ExtendedStayAmerica 008152 – 008339	Atlanta Psychological Services – Dr. Jessenia Rodriguez – Medical Records for IASIA SWEETING
ExtendedStayAmerica 008340 – 008400	CIOX – Wellstart Cobb Hospital – Medical Records for IASIA SWEETING – May 27, 2016






Documents produced by the ESA Defendants on August 26, 2016, including but not limited to:

-  Camera Work Order 113117 (07212128xA8A8F)
-  Customer Care Survey Responses (ESA028425 - 28449) (07210037xA8A8F)
-  Emergency Response Procedures Handbook (07212146xA8A8F)
-  Extended Stay America Associate Handbook (07212130xA8A8F)
-  Extended Stay Hotels Emergency Procedures Manual (Old Emergency Manual) (07212152xA8A8F)
-  Extended Stay Sex Trafficking - Revised (07212240xA8A8F)
-  Green Shield Manual (07212148xA8A8F)
-  GSR Reference Binder (07212147xA8A8F)
-  Hazard Communication Program (Duplicative) (07212140xA8A8F)
-  Hotel Manager's Security Checklist (ESA028540 - 28541) (07210060xA8A8F)
-  Housekeeping Reports 2010 - 2012 (20) (ESA001189A - 1238) (06762522xA8A8F)
-  Index to Safety and Security Handbook (ESA028450 - 28539) (07210050xA8A8F)
-  Injury Illness Prevention Program (07212137xA8A8F)
-  Medallia Site Survey Responses (ESA028375 - 28424) (07210034xA8A8F)
-  PERSONNEL FILE. Antwanne Thomas (ESA 27945 - 27992) (07186168xA8A8F)
-  PERSONNEL FILE. Denise Ross (27827 - 27944) (07186180xA8A8F)
-  Room Inspection and Battery Replacement Logs (07212135xA8A8F)
-  Safety and Security Handbook (07212131xA8A8F)
-  Safety Watch Rules (07212142xA8A8F)
-  Studio Lay Outs of Rooms (07212134xA8A8F)
-  Third Party Credit Card Authorization (07212143xA8A8F)
-  Tourist Accommodation Inspection Record (07212133xA8A8F)
-  Transcript of Blood Borne Pathogen Training (ESA027993 - 28065) (07209772xA8A8F)
-  Transcript of Fire Safety Training (ESA028066 - 28095) (07209778xA8A8F)
-  Transcript of Hazard Communications Training (ESA028096 - 28171) (07209786xA8A8F)
-  Transcript of Hotel Security Procedures Training (ESA028172 - 28298) (07209794xA8A8F)
-  Transcript of Injury Illness Prevention Program (07209812xA8A8F)
-  Transcript of Lock Out Tag Out Training (ESA028328 - 28349) (07209832xA8A8F)

Documents produced by the ESA Defendants on September 19, 2016, including but not limited to:

-  2. Gwinnett PD Security Services Agreement - David Richard (07282692xA8A8F)
-  3. Gwinnett PD Security Services Agreement - Jose Collazo (07282703xA8A8F)
-  4. Gwinnett PD Security Services Agreement - Matthew Williamson (07282668xA8A8F)
-  5. Gwinnett PD Security Services Agreement - Seth Bailey (07282393xA8A8F)
-  6. Expense Report for September 2010 (2) (07275615xA8A8F)
-  7. Expense Reports for November 2010 (2) (07275691xA8A8F)
-  8. Expense Reports for October 2010(2) (07275563xA8A8F)
-  9. Cash Drawer Log (07257751xA8A8F)
-  10. Expense Reports for December 2010 (2) (07259656xA8A8F)
-  11. Expense Reports for July 2010 (07258475xA8A8F)
-  12. Expense Reports for May 2010 (07257743xA8A8F)
-  13. 2010 Work Schedule (07244963xA8A8F)
-  14. Expense Reports for April 2010 (07243130xA8A8F)
-  15. Expense Reports for December 2010 (07235308xA8A8F)
-  16. Expense Reports for November 2010 (07235379xA8A8F)
-  17. MMS Surveys 2010 (07236419xA8A8F)
-  18. Expense Reports for August 2010 (07227997xA8A8F)
-  19. Expense Reports for February 2010 (07230866xA8A8F)
-  20. Expense Reports for January 2010 (07229043xA8A8F)
-  21. Expense Reports for June 2010 (07230676xA8A8F)
-  22. Expense Reports for March 2010 (07230852xA8A8F)
-  23. Expense Reports for October 2010 (07228112xA8A8F)
-  24. Expense Reports for September 2010 (07228006xA8A8F)

Documents produced by the ESA Defendants on September 28, 2016, including but not limited to:

-  Aug 2011 Expenses Work Schedules (06762637xA8A8F)
-  December 2014 Expenses (06827599xA8A8F)
-  Jan 2013 Monthly Expenses (06804705xA8A8F)
-  Jan 2014 Monthly Expenses (06827577xA8A8F)
-  March 2013 Monthly Expenses (06804888xA8A8F)
-  March 2014 Monthly Expenses (06827580xA8A8F)
-  May 2014 Monthly Expenses (06827587xA8A8F)
-  Oct 2013 Monthly Expenses (06804848xA8A8F)
-  Receipt for Room 318 from 8-24-10 until arrest (07215506xA8A8F)
-  Security Officers Invoice Info (07313844xA8A8F)
-  Sept 2013 Monthly Expense Reports (06804770xA8A8F)

**ALL DOCUMENTS IDENTIFIED AND ATTACHED TO WITNESS DEPOSITIONS**

- Darryle Taylor
- 30(b)(6) Deposition of Extended Stay America, Inc., et al., through Darryle Taylor
- Corienne Smith
- Lucila Sainz
- Pandora Thomas
- John Triplett
- Antwannet Thomas
- Mauricio Raigosa
- 30(b)(6) Deposition of Extended Stay America, Inc., et al., through David Bonnell
- 30(b)(6) Deposition of Extended Stay America, Inc., et al., through Rabon Mayes
- Lisa Zumbrum
- Calvin McIntosh
- Najlaa McIntosh
- Omarra Swain
- Wayne Gelb
- Sanjay Shah
- Khanowk McIntosh
- Aaron Coley
- Anthony Quinn Gonzalez
- Dr. Carol Terry
- Cathleen Mann
- Charlene Nance
- Daniel Blackmon
- Darnell Morgan

- Dawn Niles
- Steven Eichel
- William Carter
- Elvis Morgan
- Iasia Sweeting
- Ivern Sweeting
- Jill Gates
- J.P. Gingras
- Kimberly Cleveland
- Lilly Morgan
- Olympia Osselyn
- Sarah Dunn
- Stephanie McIntosh
- Stephen Messner
- Dr. Todd Antin
- Any other deposition taken in this case.

**ALL DOCUMENTS PRODUCED TO DEFENDANTS BY PLAINTIFF**

Including, but not limited to:

- All materials including in the Gwinnett County DA's File
- The Medical Examiner's Report, including photos
- Photographs of the Hotel and the Hotel Room
- Gwinnett Fire & Emergency Services Records
- Police Reports from prior incidents at Hotel and neighboring hotel owned, operated, and managed by the ESA Defendants.
- Scan of the Hotel Room
- Order Appointing Administrator of Estate
- Photos and Videos of Iasia Sweeting
- Iasia Sweeting Medical Records

**OTHER DOCUMENTS/EVIDENCE**

- All documents listed by Defendants in their portion of the Pre-Trial Order
- All pleadings
- All discovery responses by Defendants
- All documents produced in discovery by Defendants

- All documents identified in depositions
- Documents and other materials taken from Defendants' Room 310
- Georgia Death Certificate
- Annuity Mortality Table for 1949, Ultimate
- Calvin McIntosh Guilty Plea and Sentencing Documents
- Iasia Sweeting Medical Records
- Children's Healthcare of Atlanta Records for Alcenti's Siblings
- The files of all expert witnesses
- Documents in possession of witnesses subpoenaed to trial.

Plaintiffs reserve the right to amend this list of documentary and physical evidence and may do so by giving reasonable notice to opposing counsel and to the Court prior to trial. Inclusion of any exhibit above is not an admission as to its admissibility or authenticity and such objections are expressly reserved.



### **Witness Testimony That May Be Introduced By Deposition**

1. Darryle Taylor
2. 30(b)(6) Deposition of Extended Stay America, Inc., et al., through Darryle Taylor
3. Corienne Smith
4. Lucila Sainz
5. Pandora Thomas
6. John Triplett
7. Atwannet Thomas
8. Mauricio Raigosa
9. 30(b)(6) Deposition of Extended Stay America, Inc., et al., through David Bonnell
10. 30(b)(6) Deposition of Extended Stay America, Inc., et al., through Rabon Mayes
11. Lisa Zumbrum
12. Omarra Swain
13. Wayne Gelb
14. Sanjay Shah
15. Calvin McIntosh
16. Najlaa McIntosh
17. Khanowk McIntosh
18. Aaron Coley
19. Anthony Quinn Gonzalez
20. Dr. Carol Terry
21. Cathleen Mann
22. Charlene Nance
23. Daniel Blackmon

24. Darnell Morgan
25. Dawn Niles
26. Steven Eichel
27. William Carter
28. Elvis Morgan
29. Iasia Sweeting
30. Ivern Sweeting
31. Jill Gates
32. J.P. Gingras
33. Kimberly Cleveland
34. Lilly Morgan
35. Olympia Osselyn
36. Sarah Dunn
37. Stephanie McIntosh
38. Stephen Messner
39. Dr. Todd Antin
40. Zenobia Ingram
41. Zelian Steward

All depositions listed by Defendants in their portion of the Pre-Trial Order.

Plaintiffs reserve the right to add to this list from the may call witness list depending on whether Plaintiffs can serve subpoenas on the may call list of witnesses which Plaintiffs commenced previously.

## **Plaintiffs' List of Witnesses**

### **Plaintiffs will have at trial:**

1. Ann Herrera

### **Plaintiffs may have at trial:**

2. Iasia Sweeting
3. Darryle Taylor
4. Corienne Smith
5. Lucila Sainz
6. Pandora Thomas
7. John Triplett
8. Antwannet Thomas
9. Mauricio Raignosa
10. David Bonnell
11. Rabon Mayes
12. Karlene Fairweather
13. Wayne Gelb
14. Lisa Zumbrum
15. Omarra Swain
16. Sanjay Shah
17. Other employees of Defendants identified in documents produced by Defendants.
18. Carol A. Terry, MD
19. Ericha N. LeSassier
20. Officer M. McGowen, Sandy Spring Police Department
21. Officer J.M. Lawson, Gwinnett County Police Department
22. Sgt. J. Morales, Gwinnett County Police Department
23. Det. J.V. Sweeney, Gwinnett County Police Department
24. Det. M. Kenck, Gwinnett County Police Department
25. Officer J. Tucker, Gwinnett County Police Department
26. Officer R. Blackburn, Gwinnett County Police Department
27. Sgt. J. Richter, Gwinnett County Police Department
28. Officer B. Vegter, Gwinnett County Police Department
29. Det. J. Jaster, Gwinnett County Police Department
30. CSS III P. Torres, Gwinnett County Police Department
31. CSS I Adrienne Hill, Gwinnett County Police Department
32. CS Supervisor, S. Hill, Gwinnett County Police Department
33. Inv. J. Madsen, Gwinnett County Police Department
34. Officer T.O. Barnett, Gwinnett County Police Department
35. Det. D. Boyd, Gwinnett County Police Department
36. Det. Cpl. D. Brucz, Gwinnett County Police Department
37. Det. Sgt. Brookins, Gwinnett County Police Department
38. Det. C. Flynn, Gwinnett County Police Department
39. Det. Sgt. G. Lorenzo, Gwinnett County Police Department
40. CSS III B. Barrington, Gwinnett County Police Department

41. Other law enforcement personnel identified in the documents produced by the parties
42. Toni Chapman, Northside Hospital
43. Dr. Finnegan, Northside Hospital
44. Dr. S. Messner, CHOA-Scottish Rite
45. Hee Jin, GMC-Duluth
46. Nurse Supervisor Janet, GMC-Duluth
47. Other medical personnel who treated/examined Alcenti McIntosh and Iasia Sweeting
48. Gwinnett County Fire and Emergency Services Personnel who treated/examined Iasia
49. Sarah Dunn, MD
50. Lucy Albough
51. Elvis Morgan
52. Donshea Smith
53. Steven Eichel
54. Cathleen Mann
55. Aaron Coley
56. Alondra Leary
57. Anthony Quinn Gonzalez
58. Charlene Nance
59. Daniel Blackman
60. Darnell Morgan
61. Dawn Niles
62. Dr. William Carter
63. Elvis Morgan
64. India Sweeting
65. Ivern Sweeting
66. Jacquelyn Crossland
67. Jill Gates
68. J.P. Gingras
69. Khanowk McIntosh
70. Kimberly Cleveland
71. Lilly Morgan
72. Calvin McIntosh
73. Najlaa McIntosh
74. Olympia Osselyn
75. Stephanie McIntosh
76. Any witnesses identified by Defendants in discovery;
77. Any witnesses listed by Defendants as “will call” or “may call” witnesses;
78. Other crime victims (named in police reports and internal incident reports);
79. Other hotel guests identified in the documents produced by Defendants;
80. Pharoah Owens
81. Aaron Gibriel
82. Tim Dees
83. Joseph Wheeler
84. Brenda Stanton
85. Nicholas Mattera
86. Bill Richendollar
87. Jackie Williams

88. Ira Williams
89. Chan Kim
90. Gabe Lustman
91. Faheed Munshi
92. Anthony Coorey
93. April Howell
94. Robin Meechem
95. Robert Pearson
96. Melissa Howard
97. Thomas Webster
98. Dr. Todd Antin
99. Zenobia Ingram
100. Zelian Steward

All witnesses listed by Defendants in their portion of the Pre-Trial Order.

Plaintiffs reserve the right to amend this list of witnesses and may do so by giving reasonable notice prior to trial of any such additional witnesses to opposing counsel.

**EXHIBIT “A”  
ESA DEFENDANTS EXHIBIT LIST**

1.	ExtendedStayAmerica 000290-309	Northside Hospital Medical Records (Alcenti McIntosh)
2.	ExtendedStayAmerica 000310-329	Emory Midtown – Billing Records (Iasia Sweeting)
3.	ExtendedStayAmerica 000330-354	Gwinnett County Fire and Emergency Services (Iasia Sweeting)
4.		Grady Hospital and Grady Behavioral Health records
5.	ExtendedStayAmerica 000355-369	Grady Hospital and Grady Behavioral Health – Billing Records
6.	ExtendedStayAmerica 000370-379	Northside Hospital – Billing Records (Alcenti McIntosh)
7.	ExtendedStayAmerica 000380-381	Odyssey Family Counseling Center – Verification of Authenticity for records (Iasia Sweeting)
8.	ExtendedStayAmerica 000382-401	Odyssey Family Counseling Center Medical Records (Iasia Sweeting)
9.	ExtendedStayAmerica 000402-427	Piedmont Hospital – Billing Records (Iasia Sweeting)
10.	ExtendedStayAmerica 000428-1491	Piedmont Hospital – Medical Records (Iasia Sweeting)
11.	ExtendedStayAmerica 001492-1622	Riverwood Behavioral Health System (Iasia Sweeting)
12.	ExtendedStayAmerica 001623-1775	Wellspring Living (Iasia Sweeting)
13.	ExtendedStayAmerica 001776-1922	Families First Records (Iasia Sweeting)
14.	ExtendedStayAmerica 001923-1965	ViewPoint Health Records (Iasia Sweeting)
15.	ExtendedStayAmerica 001966-2050	GMC Medical Records (Iasia Sweeting) – provided by Calvin McIntosh
16.	ExtendedStayAmerica 004218-4405	Atlanta Medical Center records
17.	ExtendedStayAmerica 004406-6538	GMC Gwinnett Medical Center
18.	ExtendedStayAmerica 006539	Piedmont Billing
19.	ExtendedStayAmerica 006540	Piedmont- Medical Records
20.	ExtendedStayAmerica 006793-8045	Emory Midtown (Iasia Sweeting)
21.	ExtendedStayAmerica 008152-8339	Dr. Rodriguez/ Atlanta Psychological Services (Iasia Sweeting)
22.	ExtendedStayAmerica 008046-8151	Promise Land medical records (Iasia Sweeting)
23.	ExtendedStayAmerica 008340-8400	Wellstar Cobb (Iasia Sweeting)
24.	ExtendedStayAmerica 000001-2	1/8/2012 Incident Report – Case #120002520 Failure to obey by Pedestrian (Iasia Sweeting)
25.	ExtendedStayAmerica 000003-12	2/21/2011 Incident Report – Case #110016567 Criminal Trespass (Khanowk McIntosh)
26.	ExtendedStayAmerica 000013-17	3/13/2008 Incident Report – Case #08-033938 Theft by Taking – Automobile (Elvis Morgan)
27.	ExtendedStayAmerica 000018-19	4/14/2010 Incident Report – Case #10-043451 Runaway Juvenile (Elvis Morgan/Iasia Sweeting)
28.	ExtendedStayAmerica 000020-21	6/29/2016 Incident Report – Case #16-062704 Financial Transaction Card Fraud (Elvis

		Morgan)
29.	ExtendedStayAmerica 000022-24	6/30/2016 Incident Report – Case #16-063024 Person Down (Iasia Sweeting)
30.	ExtendedStayAmerica 000025-26	7/9/2012 Incident Report – Case #120063316 Runaway Juvenile (Halimah McIntosh/Najlaa McIntosh)
31.	ExtendedStayAmerica 000027-28	7/30/2013 Incident Report – Case#130068585 Warrant/Serv/Arr Warrant Service/Arrest (Calvin McIntosh)
32.	ExtendedStayAmerica 000029-31	7/30/2013 Incident Report – Case#130708496 Wanted Person Located (Calvin McIntosh)
33.	ExtendedStayAmerica 000032-36	8/3/2017 Incident Report – Case#17-076790 Burglary/Forced Entry/Non Residence (Iasia Sweeting)
34.	ExtendedStayAmerica 000037-38	8/28/2016 Incident Report – Case#16-083936 Identity Fraud (Iasia Sweeting)
35.	ExtendedStayAmerica 000039-41	10/28/2005 Incident Report – Case#05-147401 Simple Assault – Harassing Phone Calls (Elvis Morgan)
36.	ExtendedStayAmerica 000042-46	11/9/2008 Incident Report – Case#08-151837 Theft by Deception (Elvis Morgan)
37.	ExtendedStayAmerica 000047-48	Marriage License Application/Certification of Copy
38.		GA. Code Ann., §19-3-33 (Application for license; requirements; application supplement-marriage report)
39.	ExtendedStayAmerica 000049-50	ESA – 7/18/2014 Prostitution and Human Trafficking SOP
40.	ExtendedStayAmerica 000051-212	Orkin at Extended Stay America (Pest Control) from 2010 through 2014
41.	ExtendedStayAmerica 000213-222	Orkin at Extended Stay America (Pest Control) additional 2010
42.	ExtendedStayAmerica 000223-289	Incident Reports from DeKalb Police Department regarding Iasia Sweeting and Elvis Morgan
43.	ExtendedStayAmerica 002051	Photograph of Iasia Sweeting
44.	ExtendedStayAmerica 002052-2053	Registration Card and ID of Najlaa McIntosh
45.	ExtendedStayAmerica 002054-2056	Folio for Room 318
46.	ExtendedStayAmerica 002057-2064	Receipts signed by Khanowk
47.	ExtendedStayAmerica 002065-2330	Receipts signed by Najlaa McIntosh 7.4.11 through 9.6.14
48.	ExtendedStayAmerica 002792-2847	Training Checklists received from Darryle Taylor
49.	ExtendedStayAmerica 003532-3535	How To Report Guest Incidents and Claims
50.	ExtendedStayAmerica 003536	Incident Report Quick Reference
51.	ExtendedStayAmerica 003537	Incident Reporting Quick Reference Guide
52.	ExtendedStayAmerica 003562-3719	ESH Safety-Security Module 2-28-13 Final Master
53.	ExtendedStayAmerica 003720-3803	ESH Safety Training Module
54.	ExtendedStayAmerica 003804-3878	Emergency Response Manual - 032013

55.	ExtendedStayAmerica 003879-3953	Emergency Response Manual - 042013.
56.	ExtendedStayAmerica 003954-4041	Emergency Response Manual-RED BOOK 1-01-10
57.	ExtendedStayAmerica 004042-4217	Hskp Final Master2
58.	ExtendedStayAmerica 006541A ExtendedStayAmerica 006541-6546	Certification Wyndham Request Response Letter
59.	ExtendedStayAmerica 006547	Wyndham whg folio1540461 via email from James Park
60.	ExtendedStayAmerica 006548-6550	Wyndham whg folio1540463 via email from James Park
61.	ExtendedStayAmerica 006551	Wyndham whg folio1540466 via email from James Park
62.	ExtendedStayAmerica006552A ExtendedStayAmerica 006552-6581	Certification CCFA 1 Comprehensive Child and Family Assessment for 3 McIntosh children
63.	ExtendedStayAmerica 006582-6607	CCFA 2Comprehensive Child and Family Assessment for Florence McIntosh
64.	ExtendedStayAmerica 006608-6627	CCFA 3 Genogram and Multidisciplinary Team Meeting
65.	ExtendedStayAmerica 006628-6673	DDS Instructor Manual Part 1
66.	ExtendedStayAmerica 006674-6729	DDS Instructor Manual Part 2
67.	ExtendedStayAmerica 006730-6740	GA Dept Driver Services Sweeting Docs
68.	ExtendedStayAmerica 006741-6792	Criminal records related to Elvis Morgan
69.	ESA 4301- 4509	Kaizen Training Standards Manual (4.1.14)
70.	ESA 15773 – 15774	ESH Intake First Report
71.	ESA 15936 - 16112	GSR Reference Binder
72.	ESA 24277 - 24354	Guestroom Deficiency Logs - Battery Replacement Logs (Green Shield Logs)
73.	ESA 28542 - 28543	Studio Lay Outs of Rooms
74.	ESA 28544 - 28750	Emergency Procedures Manual (Old Emergency Manual)
75.	ESA 28751 - 28821	Green Shield Manual
76.	ESA 28822 - 28858	GSR Reference Binder
77.	ESA 28937 - 29014	Room Inspection and Battery Replacement Logs
78.	ESA 29015 - 29025	Tourist Accommodation Inspection Record
79.	ESA 29099 - 29154	Extended Stay America Associate Handbook
80.	ESA 29158 - 29163	Gwinnett PD Security Services Agreement - Brooks Harter
81.	ESA 29164 - 29169	Gwinnett PD Security Services Agreement - David Richard
82.	ESA 29170 - 29175	Gwinnett PD Security Services Agreement - Jose Collazo
83.	ESA 29176 - 29181	Gwinnett PD Security Services Agreement - Matthew Williamson
84.	ESA 29182 – 29187	Gwinnett PD Security Services Agreement - Seth Bailey



85.	ESA 34394 - 34459	Receipts for Room 318
86.	ESA 34460 - 34468	Security Officers Invoice Info
87.	No bates	Calvin McIntosh Alfred Plea 09.30.18
88.	From Plt Production	Gwinnett County District Attorney's File
89.	From Plt Production	ESA photographs
90.	From Plt Production	Gwinnett County Medical Examiner's Report
91.	From Plt Production	Documents from Gwinnett County Fire & Emergency Services
92.	From Plt Production	Email Chats between Iasia and Calvin
93.	From Plt Production	Journal-Diary Entries
94.	From Plt Production	Appeal Briefs
95.		Gwinnett County Police Department records
96.		Handwritten Notes Recovered from Room 310
97.		Folios Recovered from Room 310
98.		ESA Correspondence Recovered from Room 310
99.		Documents from Laptop from Hotel Room 310
100.		Documents Recovered from Room 310
101.		All Photographs Recovered from Room 310
102.		Juvenile Proceeding (Florence McIntosh) transcripts and exhibits attached thereto
103.		Juvenile Proceeding (Florence McIntosh) Orders and pleadings.
104.		Department of Family and Children's Services (DFCS) records
105.		Iasia Sweeting social media records and videos
106.		Video recordings of Iasia Sweeting interviews with the media
107.		Video recordings of Iasia Sweeting from various conference and symposiums
108.		Endangered Runaway document
109.		DeKalb County High School Transcripts
110.		Iasia Sweeting Drivers License
111.		Karim Vellani file
112.		Dr. Todd Antin's file (including testing results and documents)
113.		Charlotte Ware file
114.		All medical records and bills for Iasia Sweeting and Alcenti McIntosh
115.		Case Reports: Catatonic & Psychotic Symptoms Owing to the Trauma of Captivity in a Cult Environment.

116.	Nia Project File
117.	Google Earth map of 7050 Jimmy Carter Blvd attached to Officer Gonzalez's deposition
118.	Dr. Steve Messner deposition exhibits and file materials
119.	Complaint and Amended Complaint (16-C-01271-4)
120.	Motion for Summary Judgment and all exhibits attached thereto
121.	Plaintiff's Opposition to Motion for Summary Judgment
122.	Transcripts of Hearings in this matter
123.	Motion to Dismiss and all exhibits attached thereto
124.	Plaintiffs Motions in Limine
125.	Plaintiffs' Oppositions to Defendants' Motion in Limine
126.	Pleadings and Orders related to Iasia Sweeting's Personal Injury matter ((16-C-06630-4)
127.	Plaintiffs' responses to Defendants' discovery requests
128.	Deposition of Iasia Sweeting – 3/30/17
129.	All Exhibits attached to depositions
130.	Any document produced during discovery (by parties and non-parties)
131.	Any exhibit listed by Plaintiffs in the Pre-Trial Order
132.	Any pleadings filed in this matter
133.	Any document provided to or reviewed by experts
134.	Any documents or tangible things to be used for impeachment of witnesses
135.	Depositions of any fact witness(es) for potential use as impeachment
136.	Depositions of Plaintiffs' expert witness(es) for potential use as impeachment
137.	Any document contained within any expert witness's file including expert reports or documents or studies relied upon by the expert.
138.	Any and all publications or papers authored or co-authored by any of Plaintiffs' experts

Defendants may not tender all exhibits listed. Defendants expressly reserve the right to supplement the above list prior to trial with adequate notice to Plaintiffs. The Defendants have not seen Plaintiffs' exhibits and therefore cannot stipulate to their authenticity. These Defendants object to any of Plaintiffs' proposed exhibits that were not properly disclosed during discovery or that Defendants have not had an opportunity to review prior to trial. These Defendants further object to any of Plaintiffs' proposed exhibits that are not

properly identified. These Defendants do not stipulate to the authenticity of any documents identified by Plaintiffs without first having the opportunity to review the proposed exhibit. These Defendants reserve the right to object to the admissibility of any document identified herein on any ground other than authenticity. Additionally, Defendants reserve the right to object to any proposed documentary and/or physical evidence until it is properly authenticated and tendered. Further, Defendants reserve the right to use impeachment materials and demonstrative aids as allowed by law without being listed herein.

**DEFENDANTS EXTENDED STAY – EXHIBIT “B”**

**MAY CALL WITNESS LIST**

1. Iasia Sweeting
2. Calvin McIntosh
3. Najlaa McIntosh
4. Khanowk McIntosh
5. Stephanie McIntosh
6. Donshea Smith
7. Debra Clark
8. Jacquelyn Crosland
9. Daniel Blackman
10. Darnell Morgan
11. Elvis Morgan
12. Ivern Morgan
13. Lilly Morgan
14. India Sweeting
15. Charlene Nance
16. Kimberly Cleveland
17. Aaron Jarrod Coley
18. Darryle Taylor
19. Corienne Smith
20. Mauricio Raigosa
21. Sanjay Shah
22. Wayne Gelb
23. Omarra Swain
24. John Triplett
25. Lucila Sainz
26. Pandora Thomas
27. Antwannet Thomas
28. Lisa Zumbrum
29. David Bonnell
30. Wayne Gelb
31. Zenobia Ingram
32. Karim Vellani
33. Dr. Todd M. Antin
34. Charlotte Ware
35. Officer Seth Bailey
36. Officer M. McGowen
37. Officer J.M. Lawson
38. Officer J. Morales
39. Det. M. Kenck
40. Officer J.V. Sweeney
41. Officer J. Tucker
42. Officer R. Blackburn
43. Sgt. J. Richter

44. Officer B. Vegter
45. Det. J. Jaster
46. Inv. J. Madsen
47. Officer T.O. Barnett
48. Det. D. Boyd
49. Det. Cpl. D. Brucz
50. Det. Sgt. Brookins
51. Det. C. Flynn
52. Det. Sgt. G. Lorenzo
53. Officer D.M. Jias
54. Officer A.Q. Gonzales
55. CSS III P. Torres
56. CSS I Adreinne Hill
57. CS Supervisor S. Hill
58. CSS III B. Barrington
59. Inv. J. Madsen
60. Corp. Benjamin Finney
61. Carlos Spears
62. Mark Gerrin
63. Dustin Hall
64. Victor Farmer
65. Vee Sanchez
66. Brad Hamer
67. Balint Kozak
68. Ruben Ponce
69. Stephen Ricci
70. Bard Hamer
71. Scott Brown
72. Carol A. Terry
73. Ericha N. LeSassier
74. Michelle Clem
75. Tony Chapman
76. Dr. Finnegan
77. Dr. Stephen Messner
78. Dr. Erica Jin
79. Jill Gates
80. Drake Coggins
81. Dexter Coggins
82. Dr. William Carter
83. Dr. Sarah E. Dunn.
84. Dr. Ann C. Swartz
85. Dr. Nadine Kaslow
86. Dr. Daniel Cucco
87. Lucy Allbaugh
88. Dawn Niles
89. Jeffrey Foster

90. Alondra Leary
91. Elaine Cannick
92. Dr. Jennifer Wooten
93. Robin Heard
94. Leticia Williams
95. Dr. Emily Garai
96. Shannon Stapleton
97. Dr. Hayley Sooknarine
98. Karen Alexander
99. Erica LeSassier
100. Dr. Barry Alexander
101. Alexander Langley, RN
102. Dr. Tony Kanluen
103. Erin Cantrell, MSW
104. Dr. John Chenevey
105. Yvonne Wallace, LCSW
106. Dr. V Bonzmner
107. Dr. Eric Goldklang
108. Dr. Thomas Giberson
109. Makisha Pinney, RN
110. Karen Lysaith, RN
111. Andrew Young, LAPC
112. Dr. Ae Cha
113. Dr. Arun Lakhanpal
114. Dr. Hina Hussain
115. Matthew Mudge, RN
116. Dr. Earl Grubbs
117. Dr. Andrew Dickerson
118. A Jackson, RN
119. Dr. Rizwan Bashir
120. Dr. José Cangiano
121. Dr. Phyllis McCarthy
122. Dr. Sunil Bhole
123. Ryan Green
124. Olympia Osselyn
125. Yvette Etheridge
126. Rhonda Westbrook
127. Zelian Steward
128. Records custodian of Atlanta Medical Center
129. Any witness listed in Atlanta Medical Center records related to Iasia Sweeting
130. Record custodian of Gwinnett County Division of Family and Children Services
131. Any witness listed in the Gwinnett County Division of Family and Children Services records
132. Records custodian of Fulton County Division of Family and Children Services
133. Any witness listed in the Fulton County Division of Family and Children Services records

134. Record custodian or representative of Gwinnett Medical Center
135. Any witness listed in Gwinnett Medical Center records related to Iasia Sweeting.
136. Record custodian or representative of Gwinnett County Fire and Emergency Services
137. Any witness listed in Gwinnett County Fire and Emergency Services records related to Iasia Sweeting
138. Record custodian or representative of Riverwood Behavioral Health System
139. Any witness listed in Riverwood Behavioral Health System records related to Iasia Sweeting.
140. Corporate Representative from Riverwood Behavioral Health System
141. Records custodian of Wellspring Living
142. Any witness listed in Wellspring Living records related to Iasia Sweeting
143. Records custodian of View Point Health
144. Any witness listed in View Point Health records related to Iasia Sweeting
145. Records custodian of Atlanta Psychological Services
146. Any witness listed in Atlanta Psychological Services records related to Iasia Sweeting
147. Records custodian of Loving Helping Hands, Inc.
148. Any witness listed in Loving Helping Hands, Inc. records related to Iasia Sweeting
149. Records custodian of McIntosh Trail Community Service Board
150. Any witness listed in McIntosh Trail Community Service Board records related to Iasia Sweeting
151. Records custodian of Odyssey Family Counseling Center
152. Any witness listed in Odyssey Family Counseling Center records related to Iasia Sweeting
153. Records custodian of Families First
154. Any witness listed in Families First records related to Iasia Sweeting
155. Records custodian of Grady Hospital
156. Any witness listed in Grady Hospital records related to Iasia Sweeting
157. Records custodian of Cobb Hospital
158. Any witness listed in Records custodian of Cobb Hospital related to Iasia Sweeting
159. Records custodian of Piedmont Hospital
160. Any witness listed in Piedmont Hospital records related to Iasia Sweeting
161. Records custodian of Cliff Valley Psychologists P.A.
162. Any witness listed in Cliff Valley Psychologists P.A. records related to Iasia Sweeting
163. Record custodian or representative of Northside Hospital
164. Any witness listed in Northside Hospital records related to Alcenti McIntosh.
165. Record custodian of Gwinnett County Police Department
166. Any witness listed in the Gwinnett County Police records related to Iasia Sweeting, Calvin McIntosh and Najlaa McIntosh
167. Record custodian of Gwinnett County District Attorney
168. Any witness listed in the Gwinnett County District Attorney's file related to Iasia Sweeting, Calvin McIntosh and Najlaa McIntosh
169. Record custodian of Gwinnett County Juvenile Court
170. Any witness listed in the Gwinnett County Juvenile Court records related to Iasia Sweeting and Tehent "Florence" McIntosh
171. Corporate Representative from Department of Driver's Services
172. Records custodian of Wells Fargo & Company.

173. Other medical personnel who treated/examined Alcenti McIntosh and Iasia Sweeting.
174. Other law enforcement personnel identified in the documents produced by Defendants and Plaintiffs.
175. Any witness identified on Plaintiffs' list of witnesses that Plaintiffs MAY have present at trial.
176. Any records custodian needed for authentication.
177. Any and all persons who will or maybe needed by Defendants during the course of trial to rebut or impeach testimony.

Defendants reserve the right to call any additional witnesses whose names are provided to the Plaintiffs in advance of trial.