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**IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA**

STACEY KALBERMAN,

Plaintiff,

vs.

GEORGIA GOVERNMENT
TRANSPARENCY AND
CAMPAIGN FINANCE
COMMISSION, f/k/a GEORGIA
STATE ETHICS COMMISSION,
HOLLY LABERGE, in her Official
capacity as Executive
Secretary of the Georgia
Transparency and Campaign
Finance Commission, and
PATRICK MILLSAPS, in his
Individual capacity,

Defendants

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Civil Action No.:
2012CV216247

**DEFENDANT HOLLY LABERGE'S RESPONSES TO PLAINTIFF'S
FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

COMES NOW, The Georgia Government Transparency and Campaign
Finance Commission, Defendant in the above-styled action, by and through its
attorney of record, the Attorney General for the State of Georgia, and serves its
Responses and Objections to Plaintiff's First Request For Production of
Documents to Defendant as follows.

Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 2

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request For Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 3

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request For Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 4

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn

Streicker) First Request for Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 5

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request For Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 6

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled “Documents in response to Plaintiff’s (Sherilyn Streicker) First Request For Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission,” Plaintiff will produce such documents to Plaintiff.

Response to Request No. 7

To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff

Response to Request No. 10

Defendant responds that she has not made a political contribution and there are no documents.

Response to Request No. 11


To the extent that Defendant is in possession of documents meeting the description of this request which have not already been produced to Plaintiff voluntarily on a disc entitled "Documents in response to Plaintiff's (Sherilyn Streicker) First Request For Production of Documents Produced by: Georgia Government Transparency and Campaign Finance Commission," Plaintiff will produce such documents to Plaintiff.

Respectfully submitted,

SAMUEL S. OLENS 551540
Attorney General

DENNIS R. DUNN 234098
Deputy Attorney General


ANNETTE M. COWART 191199
Senior Assistant Attorney General


BRYAN K. WEBB 743580
Senior Assistant Attorney General

PLEASE SERVE:

BRYAN K. WEBB

Senior Assistant Attorney General

40 Capitol Square, S.W.

Atlanta, Georgia 30334-1300

Tele: (404) 656-5331

Fax: (404) 657-9932

Email: bwebb@law.ga.gov

CERTIFICATE OF SERVICE

I hereby certify that on June 14th, 2013, I served the foregoing


DEFENDANT HOLLY LABERGE'S RESPONSES TO PLAINTIFF'S

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS upon opposing

counsel in this case by sending a copy via the United States Mail with adequate postage affixed and addressed as follows:

Kimberly Worth
Barton Black
JOYCE THRASHER KAISER & LISS, LLC
Five Concourse Parkway
Suite 2600
Atlanta, Georgia 30328

This 14th day of June, 2013.


Bryan K. Webb
Counsel for Defendant
State Bar No.: 743580