

CAUSE NO. 2022-68307

MARK BURKE
Plaintiff

vs.

HCA HOUSTON HEALTHCARE
KINGWOOD
Defendant

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IN THE DISTRICT COURT OF

HARRIS COUNTY, TEXAS

234TH JUDICIAL DISTRICT

**DEFENDANT HCA HOUSTON HEALTHCARE KINGWOOD'S OBJECTION AND
RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION AND
INSPECTION**

TO: PLAINTIFF, Mark Burke, 46 Kingwood Greens Drive, Kingwood, TX 77339

Pursuant to Texas Rule of Civil Procedure 196, Defendant HCA Houston Healthcare Kingwood (hereinafter referred to as "Defendant"), serves its Objection and Response to Plaintiff's Second Request for Production and Inspection:

Respectfully submitted,

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By: /s/ Nicole G. Andrews

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CERTIFICATE OF SERVICE

This will certify that a true and correct copy of the foregoing document has been forwarded to all counsel of record pursuant to the Texas Rules of Civil Procedure on the 13th day of February 2023.

/s/ Nicole G. Andrews _____
Nicole Andrews

**DEFENDANT HCA HOUSTON HEALTHCARE KINGWOOD'S OBJECTION AND
RESPONSE TO PLAINTIFF'S SECOND REQUEST FOR PRODUCTION AND
INSPECTION**

Request 1: Production of electronic data in the form of video surveillance footage from August 9, 2022 through August 13, 2022 in .mp4 video format.

RESPONSE: Because Plaintiff has not produced a compliant expert report per Tex. Civ. Prac. & Rem. Code § 74.351(s), this request is premature and exceeds the scope of discovery. Defendant further objects that this request is overly broad, unduly burdensome, not reasonably tailored to lead to the discovery of admissible evidence.