

IN THE NEBRASKA COMMISSION OF INDUSTRIAL RELATIONS

NEBRASKA ASSOCIATION OF	)	
PUBLIC EMPLOYEES LOCAL 61	)	
of the AMERICAN FEDERATION	)	
OF STATE, COUNTY, AND	)	
MUNICIPAL EMPLOYEES,	)	
	)	
	)	
Petitioner,	)	CASE NO.
	)	
v.	)	PETITIONER'S
	)	INTERROGATORIES TO THE
COUNTY OF RICHARDSON a	)	RESPONDENT
political subdivision, and	)	
RICHARDSON COUNTY	)	
BOARD OF COMMISSIONERS,	)	
JOHN J. CAVERZAGIE, BOB	)	
CAMPBELL, RICK KARAS,	)	
	)	
Respondent.	)	

TO: COUNTY OF RICHARDSON,ET AL,, Respondent:

Please take notice that you are hereby requested by the Petitioner to answer in writing and under oath the following Interrogatories within 35 days of the filing date of the Petition filed herein, pursuant to Rule 19 of the Rules of the Nebraska Commission of Industrial Relations.

It is understood that the answers will contain the composite knowledge of the Respondents and any of Respondents' representatives or agents. These Interrogatories shall be deemed continuing, as provided under Rule 26(e) of the Nebraska Discovery Rules for All Civil Cases, and if

additional information should be discovered after originally answering them with respect to any of the matters inquired about, then it is expected that such information will be promptly revealed to the petitioner or petitioner's attorney as required by law.

DEFINITIONS

1. The term "person" as used in these interrogatories means all individuals and entities, including any individual, firm, corporation, partnership, association, company, receiver, joint venture, estate, trust
or other form or entity, including the parties to this litigation and their officers, agents, employees and representatives.
2. The term "document" as used in these interrogatories means any written, printed, typed, recorded or graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated or made, in your actual or constructive possession, custody or control, including, but not limited to, all writings, letters, minutes, bulletins, correspondence, telegrams, memoranda, notes, instructions, literature, work assignments, notebooks, records, sales forms, agreements, contracts, notations of telephone or personal conversations or conferences, interoffice communications, microfilm, circulars, pamphlets, advertisements, catalogs, studies, notices, summaries, reports, books, invoices, graphs, photographs, drafts, data sheets, data compilations, computer data sheets, computer data compilations, worksheets, statistics, speeches and other writings, tape recordings, transcripts of tape recordings, data compilations from information which can be obtained or can be translated through detection into reasonably usable form, charts, minutes, checks, check stubs, delivery

tickets, bills of lading, invoices, flow sheets, price lists, quotations, bulletins, permits, form, data processing cards, data sheets, surveys, indexes, tapes, videotapes, film, periodicals, circulars, manuals, or any other tangible thing.

3. The term "identify" as used in these interrogatories means to set forth:
 - (a) when used with reference to a person, firm or corporation:
 - (i) the full name;
 - (ii) the present or last known business address if an individual;
 - (iii) the present or last known home address; and
 - (iv) the position and title, if any, and a description of his or her duties and responsibilities in connection with that position.
 - (b) when used with reference to a document:
 - (i) the date on the document and the date the document was prepared;
 - (ii) the identity of the person preparing the document;
 - (iii) the identity of the person for whom the document was prepared;
 - (iv) a description of the document;
 - (v) the present location of the document; and
 - (vi) the contents and subject matter of the document.
4. As used in these requests, the terms "you", "your" and "yours" refer to the Petitioners answering these interrogatories and any and all persons acting or purporting to act on defendants' behalf.

INSTRUCTIONS

1. In answering these Interrogatories, you are required not only to furnish such information as you know of your own personal knowledge, but also information which is in the possession of your attorneys, investigators or anyone else acting on your behalf or their behalf.
2. An interrogatory calling for the "basis of any statement, allegation or answer is a request to:
 - (a) State and identify completely all sources upon which such statement, allegation or answer is predicated; and
 - (b) State and identify completely every act, omission, conduct, event, transaction, document, meeting or occasion about which you have knowledge or information, which forms the predicate for any such statement, allegation or answer.
3. If your "basis" (as defined in Instruction No. 2) in answering any interrogatory:
 - (a) consists in whole or in part of any document, identify such document;
 - (b) consists in whole or in part of any oral communication, identify such oral communication;
 - (c) makes reference to any person, identify such person;
 - (d) consists in whole or in part of any inferences or chain of reasoning, set forth the same.
4. When, after a reasonable and thorough investigation using due diligence, you are unable to answer any interrogatory, or any part thereof, because of lack of information available to you, specify in full and complete detail the reason the information is not available and what has been done to

locate such information. In addition, specify what knowledge you do have concerning the unanswered portion of the interrogatory, and set forth the facts upon which such knowledge is based.

5. Where an interrogatory does not specifically request a specific fact, but where such fact or facts are necessary to make the answer to the interrogatory either comprehensible, complete or not misleading, you are required to include such fact or facts as a part of the answer and the interrogatory shall be deemed to specifically requests such fact or facts.
6. If you claim any form of privilege, whether based on a statute or otherwise, as a ground for not answering an interrogatory or any portion thereof, set forth in complete detail each and every fact upon which the privilege is based, including sufficient facts for the Commission to make a full determination whether the claim of privilege is valid.
7. Where an interrogatory calls for the description of a writing or document as to which you claim a privilege as a ground for nonproduction, please set forth with respect to the writing or document, in addition to any other information requested, its date, author, addressee, if any, title, type of tangible thing (letter, memorandum, telegram, chart, report, tape recording, etc.), subject matter (without revealing the information as to which the privilege is claimed), and, with sufficient specificity to permit the Commission to make a full determination whether the claim of privilege is valid, each and every fact or basis upon which you claim such privilege.
8. These interrogatories are to be deemed continuing and require the furnishing to petitioner of additional, updated or revised information as it may become available.

INTERROGATORIES

1. Identify the person or persons answering these interrogatories and/or providing the information to answer these interrogatories. For each person so identified, indicate which answers the person participated in the preparation of and for which answer the person supplied information.
2. Identify each person known to you or to your attorneys who is or has been in possession of information and knowledge relevant to the questions propounded herein or to any matter referred to in the pleadings in this case, describing generally the nature of the information that each person possesses.
3. Identify each and every document used or referred to by you in connection with the preparation of your answers to these interrogatories. For each document so identified, indicate for which answer such document was used.
4. What is the purpose of utilizing a GPS and AI-Integrated camera system in the equipment of the County Road department.
5. What is the policy or procedure relied upon in utilizing a GPS and/or AI-Integrated camera system in the equipment of the County Road department.
6. With respect to the Petitioner's Requests for Admission to the Respondent, for each response that is anything other than an unqualified admission, please describe in detail the reason for said response.
7. Please provide a list of all documents that the Respondent intends to use at trial including exhibits, and items identified for rebuttal.

8. Please identify and provide contact information for each individual that the Respondent intends to call as a witness in this matter.
9. Please identify the specific provisions(s) of the Collective Bargaining Agreement between the Petitioner and Respondent that allow for the implementation of a GPS and/or AI-Integrated camera system.
10. Please identify each piece of Road Department machinery and/or equipment where a GPS and/or AI-Integrated camera system is and/or is intended to be utilized by the Respondent.
11. For each piece of machinery and/or equipment identified in response to Interrogatory No. 11, please state the date in which the machinery and/or equipment:
 - a. was purchased by the Respondent County,
 - b. was delivered to the Respondent County,
 - c. any GPS and/or AI-Integrated camera system was installed by the Respondent County or identify if such a system was factory installed, and
 - d. any GPS and/or AI-Integrated camera system was activated by the Respondent County.
12. For any instruction manual identified in response to Request for Production No. 3, please identify which machine or piece of equipment such instruction manual is utilized for and the date(s) in which the GPS and/or AI-integrated camera system was first utilized by the County.

DATED July 7, 2026.

NEBRASKA ASSOCIATION OF
PUBLIC EMPLOYEES LOCAL 61
of the AMERICAN FEDERATION
OF STATE, COUNTY, AND
MUNICIPAL EMPLOYEES,
Petitioner

By: 

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above and foregoing was served upon the Respondent on July 7, 2026 by including same with the Petition, Notice of Pendency and Certificate of Service.

s/Abby Osborn

Abby Osborn