

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

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

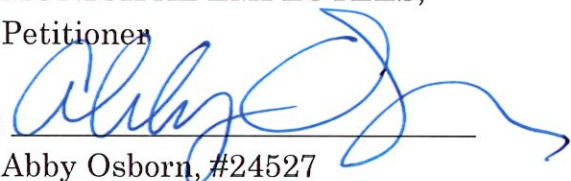
REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please provide a copy of all implemented versions of any policy or procedure related to the use of GPS and/or AI integrated camera systems by Richardson County.
2. Please provide a copy of all exhibits the Respondent intends to use at trial on this matter.
3. Please provide a copy of the instruction manual for any GPS and/or AI integrated camera system utilized by the County Road Department from January 1, 2020 forward.
4. Please provide any logs or records related to the use of GPS and/or AI integrated camera systems utilized by the County Road Department from January 1, 2020 forward.

5. Please provide a copy of any documents related to negotiations about GPS and/or AI integrated camera systems between the Petitioner and Respondent.
6. Please provide a copy of any documents referenced in your Answers to Interrogatories in this matter.
7. Please provide a copy of any documents that support any affirmative defense alleged in this matter.
8. Please provide a copy of all communications sent by the Respondent to Respondent employees subject to the collective bargaining agreement related to the use of GPS and/or AI integrated camera systems.

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