

CAUSE NO. C2018-1576B

Douglas Walter Kirk	§	IN THE DISTRICT COURT
	§	
Vs.	§	
	§	207 th JUDICIAL DISTRICT
Comal Appraisal District	§	
	§	
	§	
	§	COMAL COUNTY, TEXAS

PLAINTIFF’S REQUEST FOR DISCLOSURE

Comes now Douglas Walter Kirk, seeking RESPONSE from DEFENDANT regarding this request for disclosure.

Pursuant to TEX. R. CIV. P. 194, DEFENDANT is requested to disclose within 30 days of service of this request the information or materials described in the following subsections of Rule 194.2(a) to (i). Please respond to Douglas Kirk at 1850 Old Sattler Road, Canyon Lake, Texas 78132.

- a. the correct names of the parties to this lawsuit;
- b. the name, address, and telephone number of any potential parties;
- c. the legal theories and, in general, the factual bases of the Defendant’s claims or defenses;
- d. the amount of and any method of calculating economic damages;
- e. the name, address, and telephone number of persons having knowledge of relevant

facts, and a brief statement of each identified person's connection with the case;

f. for any testifying expert or consulting expert whose work is reviewed by a testifying expert:

1) the expert's name, address, and telephone number;

2) the subject matter on which the expert will testify;

3) the general substance of the expert's mental impressions and opinions and a brief summary of the basis for them, or if the expert is not retained by, employed by, or otherwise subject to the control of the Plaintiff, documents reflecting such information;

4) if the expert is retained by, employed by, or otherwise subject to the control of the Defendant:

A) all documents, tangible things, reports, models, or data compilations that have been provided to, reviewed by, or prepared by or for the expert in anticipation of the expert's testimony; and

B) the expert's current resume and bibliography;

g. any indemnity and insuring agreements described in Rule 192.3(f);

h. any settlement agreements described in Rule 192.3(g); and

i. any discoverable witness statements.

Respectfully Submitted,

By _____
Douglas Walter Kirk, *pro se*
1850 Old Sattler Road
Canyon Lake, Texas 78130
Telephone: (830) 237-7313
E-mail: dougkirk@gvtc.com

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CERTIFICATE OF SERVICE

I hereby certify that pursuant to the Texas Rules of Civil Procedure on this the _____ day of May, 2019, a true and correct copy of the foregoing has been served via certified mail (70182290000166284835) on Defendant Comal Appraisal District, 900 South Seguin Avenue, New Braunfels, Texas, 78130 through its attorney Kirk Swinney (State Bar No. 19588400) at Low Swinney Evans & James, PLLC, 623 S. Baker Cir., Leander, Texas 78641, Phone (512) 379 5800.

By _____
Douglas Walter Kirk, *pro se*
1850 Old Sattler Road
Canyon Lake, Texas 78130

Telephone: (830) 237-7313
E-mail: dougkirk@gvvc.com

Douglas Kirk
1850 Old Sattler Road
Canyon Lake, Texas 78132
(830) 237-7313
dougkirk@gvtc.com

May 22, 2019

Subject: Plaintiff's First Set of Interrogatories NO. C2018-1576B
Plaintiff's Request for Disclosures
Plaintiff's First Request for Production and Inspection.

Kirk Swinney (State Bar No. 19588400)
Low Swinney Evans & James, PLLC
623 S. Baker Cir.
Leander, Texas 78641

Phone (512) 379 5800

Dear Mr. Swinney:

Enclosed please find Plaintiff's First Set of Interrogatories, Plaintiff's Request for Disclosures, and Plaintiff's First Request for Production and Inspection relative to Cause No. C2018-1576B.

Please do not hesitate to send me an email if you have any questions.

Thank you.

Sincerely,

Douglas Kirk

