

18th JUDICIAL DISTRICT COURT

PARISH OF POINTE COUPEE

STATE OF LOUISIANA

SUIT NO. 48288

DIVISION D

ERIC ADAMS AND IRGA ADAMS

VERSUS

CHAD OLINDE, ET AL.

**ANSWER TO PETITION FOR DAMAGES, RECONVENTIONAL DEMAND, AND
CROSS-CLAIM**

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NO
2018 APR 11 AM 9:19
LAW OFFICE OF
CLARENCE J. BRYANT
PARISH OF POINTE
COUPEE

The defendant, Prakash Rayamajhi, answers the Petition for Damages filed by the plaintiffs, Eric Adams and Irga Adams, and reconvenes against the plaintiff, Eric Adams, and cross-claims against the defendant, Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General Hospital, as follows:

ANSWER

1.

Mr. Rayamajhi admits he has been made a defendant, that he is a major, and that he is domiciled in the City of Danvers, Massachusetts. He denies that he is the “hacker.”

2.

Mr. Rayamajhi admits venue is appropriate as to all named defendants other than himself.

3.

The allegations of Paragraph 3 are admitted.

4.

The allegations of Paragraph 4 and 4(a) are denied for lack of information.

5.

The allegations of Paragraph 5 as to Eric Adams are admitted. The allegations of Paragraph 5(a) are denied for lack of information.

6.

The allegations of Paragraphs 6 through 27 are denied for lack of information, except that Mr. Rayamajhi explicitly denies that he is the “hacker”, that he was involved in any of the events described in the Petition, and that he is liable in any way to any of the parties.

7.

The allegations of Paragraph 28 are admitted.

8.

The allegations of Paragraphs 29 and 30 are denied as to Mr. Rayamajhi.

9.

The allegations of Paragraph 32 and of the prayer for relief are denied as to Mr. Rayamajhi.

10.

Mr. Rayamajhi was not the “hacker.” He was a victim of the actual hacker.

WHEREFORE, the defendant, Prakash Rayamajhi, prays that this Answer be deemed good and sufficient, and that, after due proceedings, the plaintiffs’ suit be dismissed with prejudice as to him, at their sole cost, reserving Mr. Rayamajhi’s rights as plaintiff in reconvention and as cross claimant.

RECONVENTIONAL DEMAND

1.

Made defendant-in-reconvention is Eric Adams, to be served through his attorney of record: Robert B. Evans, III, 3445 N. Causeway Blvd., Ste. 707, Metairie, LA 70002.

2.

Mr. Rayamajhi was not the “hacker.” He was a victim of the actual hacker.

3.

Mr. Adams, the allegedly injured plaintiff and putative class representative, improperly abused his position as a State Police officer to inject himself into the investigation of this matter, draw incorrect conclusions as to Mr. Rayamajhi’s connection to it, and use his authority to arrest Mr. Rayamajhi in Massachusetts and have him extradited to and imprisoned in Louisiana.

4.

Mr. Adams knew or should have known that Mr. Rayamajhi was not the “hacker” at the time he had Mr. Rayamajhi arrested in Massachusetts, and extradited to and imprisoned in Louisiana. Mr. Adams also knew or should have known this at the time he filed and served this suit against Mr. Rayamajhi.

5.

Mr. Adams is liable to Mr. Rayamajhi for abuse of process, false arrest, false imprisonment, and defamation.

6.

As a result of Mr. Adams' tortious conduct, Mr. Rayamajhi has suffered emotional and economic damages (including the costs of bonding out of jail and hiring an attorney, and travel costs, and a job demotion), for which he demands compensation.

WHEREFORE, the plaintiff-in-reconvention, Prakash Rayamajhi, prays that the defendant-in-reconvention, Eric Adams, be cited and served with this Reconventional Demand, and that, after due proceedings, there be judgment against the defendant-in-reconvention for the relief sought, plus costs, and legal interest from date of judicial demand until paid.

CROSS-CLAIM

1.

Made defendant-in-cross-claim is original defendant Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General Hospital, to be served through its registered agent for service of process: Chad Olinde, 7750 Island Road, Ventress, LA 70783.

2.

Mr. Rayamajh was not the "hacker." He was a victim of the actual hacker.

3.

Mr. Rayamajh adopts the allegations of Paragraphs 6-20, 28, and 29 of the original plaintiffs Petition only insofar as they are directed to the negligence of Pointe Coupee General Hospital and its officers and employees, while denying that he is the "hacker."

4.

As a result of the negligence of Pointe Coupee General Hospital and its officers and employees, Mr. Mr. Rayamajhi has suffered emotional and economic damages (including the costs of bonding out of jail and hiring an attorney, and travel costs, and a job demotion), for which he demands compensation.

WHEREFORE, the plaintiff-in-cross-claim, Prakash Rayamajhi, prays that the defendant-in-cross-claim, Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a

Pointe Coupee General Hospital, be cited and served with this Cross-Claim, and that, after due proceedings, there be judgment against the defendant-in-cross-claim for the relief sought, plus costs, and legal interest from date of judicial demand until paid.

Respectfully submitted:



Yigal Bander #24953
Beau James Brock #20721
Manasseh, Gill, Knipe & Belanger, P.L.C.
8075 Jefferson Highway
Baton Rouge, LA 70809
Phone: (225) 383-9703
Fax: (225) 383-9704
Email: yigal@manassehandgill.com

PLEASE CITE AND SEVE TOGETHER WITH DISCOVERY REQUESTS:

Eric Adams
Through his attorney of record:
Robert B. Evans, III
3445 N. Causeway Blvd., Ste. 707
Metairie, LA 70002

Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General
Hospital
Through its registered agent for service of process:
Chad Olinde
7750 Island Road
Ventress, LA 70783

18th JUDICIAL DISTRICT COURT
PARISH OF POINTE COUPEE
STATE OF LOUISIANA

SUIT NO. 48288

DIVISION D

ERIC ADAMS AND IRGA ADAMS

VERSUS
CHAD OLINDE, ET AL.

INTERROGATORIES AND REQUEST FOR PRODUCTION OF DOCUMENTS

Eric Adams
Through his attorney of record:
Robert B. Evans, III
3445 N. Causeway Blvd., Ste. 707
Metairie, LA 70002

2018 APR 11 AM 9:19
RECEIVED & FILED
CLERK OF COURT & RECORDER
PARISH OF POINTE COUPEE

The defendant/plaintiff-in-reconvention, Prakash Rayamajhi, propounds the following Interrogatories and Request for Production of Documents to the plaintiff/defendant-in-reconvention, Eric Adams, to be answered in accordance with the Louisiana Code of Civil Procedure.

INTERROGATORIES

INTERROGATORY NO. 1

Please state the name and address of each person who witnessed or claims to have witnessed any of the events alleged in your Petition.

INTERROGATORY NO. 2

Please state the name and address of any other person who has knowledge of any of the events alleged in your Petition, and what they know.

INTERROGATORY NO. 3

Please state the name and address of each person with any involvement in any of the matters sued upon, and what their involvement was.

INTERROGATORY NO. 4

Please state the name and address of each person from whom a statement, oral or written, has been obtained by you or on your behalf relating in any way to the alleged acts, stating as to each such statement whether it was taken in a written or oral form, the date it was taken or obtained and the name and address of the person who is presently in possession of it.

INTERROGATORY NO. 5

Please state whether any photographs, movies, audio recordings, or visual recordings were made, taken or prepared by you or on your behalf concerning the acts alleged in your Petition. If so, please state when any such were made, taken or prepared and the name and address of each person who made, took or prepared any such and the name and address of any person who is presently in possession of any such.

INTERROGATORY NO. 6

Please state the name and address of each witness you intend to call at the trial of this matter and what each witness will testify about.

INTERROGATORY NO. 7

Please list any and all exhibits you intend to introduce at the trial of this matter.

INTERROGATORY NO. 8

Please list any and all documents, objects, or demonstrative aids you intend to use at the trial of this matter, whether or not you intend to introduce them into evidence, including any you consider to be for impeachment purposes.

INTERROGATORY NO. 9

Please state whether you have made any oral, written, or recorded statements relating in any way to the alleged acts, the date of each statement and to whom it was made, and the name and address of the person who is presently in possession of it.

INTERROGATORY NO. 10

Please state the specific factual basis for each of the allegations in your Petition, and identify any and all documents which support your allegations.

INTERROGATORY NO. 11

Please state the specific factual basis for your allegation that Prakash Rayamajhi is the "hacker" referenced in your Petition.

INTERROGATORY NO. 12

Please state your employer, your job title, and your job duties at the time of the alleged events and at present.

INTERROGATORY NO. 13

Please state whether or not you have ever had a conversation or other communication with FBI Special Agent David M. Giammittorio, and if so the dates of those communications, the form of the communication, and the subject matter and contents of the communication.

INTERROGATORY NO. 14

Please state whether or not you have ever had a conversation or other communication with Assistant U.S. Attorney Ryan Rezaei, and if so the dates of those communications, the form of the communication, and the subject matter and contents of the communication.

INTERROGATORY NO. 15

Please state whether or not you have ever had a conversation or other communication with any officials of Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General Hospital, and if so the dates of those communications, the form of the communication, and the subject matter and contents of the communication.

INTERROGATORY NO. 16

Please state by what authority you "offered the State Police's assistance in investigating the breach" as alleged in your Petition, and who authorized you to do so.

INTERROGATORY NO. 17

Please state the particulars of the damages you allege in your Petition, and the specific factual basis for each of the particular items of damages, and identify any and all documents which support those damages.

REQUEST FOR PRODUCTION OF DOCUMENTS

REQUEST NO. 1

Please produce copies of any and all exhibits you intend to introduce at the trial of this matter.

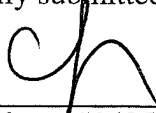
REQUEST NO. 2

Please produce copies of any and all items referenced in your answers to any of the above Interrogatories.

REQUEST NO. 3

Please produce any and all other documents or things on which you base your answers to the above Interrogatories.

Respectfully submitted:



Yigal Bander #24953
Beau James Brock #20721
Manasseh, Gill, Knipe & Belanger, P.L.C.
8075 Jefferson Highway
Baton Rouge, LA 70809
Phone: (225) 383-9703
Fax: (225) 383-9704
Email: yigal@manassehandgill.com

PLEASE SERVE TOGETHER WITH ANSWER, RECONVENTIONAL DEMAND, AND CROSS-CLAIM:

Eric Adams

Through his attorney of record:

Robert B. Evans, III

3445 N. Causeway Blvd., Ste. 707

Metairie, LA 70002

Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General Hospital

Through its registered agent for service of process:

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Ventress, LA 70783

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2018 APR 11 AM 9:19
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BK 10
LANELLE J. ANDREY
CLERK OF COURT
PARISH OF POINTE COUPEE

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Through its registered agent for service of process:
Chad Olinde
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Ventress, LA 70783

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INTERROGATORY NO. 9

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Please produce any and all other documents or things on which you base your answers to the above Interrogatories.

Respectfully submitted:



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8075 Jefferson Highway
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Eric Adams

Through his attorney of record:

Robert B. Evans, III

3445 N. Causeway Blvd., Ste. 707

Metairie, LA 70002

Hospital Service District No. 1 of Pointe Coupee, Louisiana, Inc. d/b/a Pointe Coupee General Hospital

Through its registered agent for service of process:

Chad Olinde

7750 Island Road

Ventress, LA 70783

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing has been served on all known counsel of record by email.

Baton Rouge, Louisiana, this 11th day of April, 2018.



Yigal Bander