

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

[REDACTED] as administrator)
of the estate of [REDACTED] and)
as guardian of J.H. and T.H.,)
)
Plaintiff,)

vs.)

CIVIL ACTION NO: [REDACTED]

MARTIN-ROBBINS FENCE)
COMPANY, ARCADIS U.S., INC.,)
GEORGIA DEPARTMENT)
OF TRANSPORTATION,)
and JOHN DOES 1-10,)
)
Defendants.)

[REDACTED] and [REDACTED])
[REDACTED])
)
Plaintiffs,)

vs.)

CIVIL ACTION NO: [REDACTED]

MARTIN-ROBBINS FENCE)
COMPANY, ARCADIS U.S., INC.,)
and GEORGIA DEPARTMENT)
OF TRANSPORTATION.)
)
Defendants.)

**DEFENDANT GEORGIA DEPARTMENT OF TRANSPORTATION’S
MOTION TO EXCLUDE PLAINTIFFS’ EXPERT WITNESS J.P. GINGRAS**

COMES NOW, Defendant Georgia Department of Transportation (“GDOT”), and hereby joins Defendant Martin-Robbins Fence Company’s Motion to Exclude Plaintiffs’ Expert Witness, J.P. Gingras and Brief in Support Thereof, and adopts the arguments set forth by Defendant Martin-Robbins Fence Company (“Martin-Robbins”), as if stated fully herein. Defendant GDOT respectfully requests that the relief sought by Martin-Robbins in the aforementioned Motion be

granted, and apply to GDOT and all Defendants in this case, for reasons set forth in Martin-Robbins Fence Company's Motion to Exclude Plaintiffs' Expert Witness, J.P. Gingras and Brief in Support Thereof.

Respectfully submitted this 29^h day of November, 2021.

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CERTIFICATE OF SERVICE

I do hereby certify that I have this day served the within and foregoing **DEFENDANT GEORGIA DEPARTMENT OF TRANSPORTATION'S MOTION TO EXCLUDE PLAINTIFFS' EXPERT WITNESS J.P. GINGRAS**, to counsel of record, via statutory electronic filing with the court through File & ServeXpress and

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This 29th day of November, 2021.

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