

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

██████████ ██████████ as administrator)
of the estate of ██████████ ██████████ and)
as guardian of J.H. and T.H.,)
)
Plaintiff,)

vs.)

CIVIL ACTION NO: ██████████

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

██████████ ██████████ and ██████████)
██████████)
)
Plaintiffs,)

vs.)

CIVIL ACTION NO: ██████████

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

DEFENDANT GEORGIA DEPARTMENT OF TRANSPORTATION'S
REPLY IN SUPPORT OF 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 Reply In Support of Its Motion to Exclude Plaintiffs’ Expert Witness, J.P. Gingras, 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 and Reply Brief.

Respectfully submitted this 24th day of January, 2022.

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/s/Kristine K. Hayter

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**PLEASE ADDRESS ALL
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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 REPLY IN SUPPORT OF 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 24th day of January, 2022.

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