

VIRGINIA:

IN THE CIRCUIT COURT FOR FAIRFAX COUNTY

FAIRFAX WORKERS COALITION, et al.	:	
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
FAIRFAX COUNTY, et al.	:	Civil Action No. 2025-0003246
	:	
Defendants.	:	
	:	
	:	
	:	

PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO FAIRFAX COUNTY

NOW COMES the Plaintiffs, Fairfax Workers Coalition (“FWC”) and the individual plaintiffs (collectively “Plaintiffs”), by and through her undersigned counsel, and hereby requests that the Defendant Fairfax County (the “County”) produce for inspection and copying the following documents within the time provided by the Rules of the Supreme Court of Virginia.

DEFINITIONS AND INSTRUCTIONS

1. As used herein, the term “you” or “your” refers to Defendant Fairfax County, its employees, agents, and consultants.
2. As used herein, the term “Complaint” shall refer to the Complaint in the above-styled case.
3. As used herein, the term “person” means any natural individual in any capacity whatsoever or any entity or organization, including divisions, departments and other unites thereof, and shall include, but not be limited to, a public or private corporation, partnership, joint venture, voluntary or unincorporated association, organization, proprietorship, trust, estate, government

agency, commission bureau or department.

4. As used herein, the term “representative” means any and all agents, employees, servants, officers, directors, attorneys, or other persons acting or purporting to act on behalf of the person in question.

5. As used herein, the term “document” refers to any and all types of recorded information, including, but not limited to, typewritten, electronic, photostatic, or handwritten originals (or copies when originals are not available), and non-identical copies, photographs, recordings, or other data compilations from which information can be obtained by you through detection devices and be placed by you into reasonably usable form. If you maintain any type of document management system from which documents stored in electronic form may be searched and retrieved, each document request shall be deemed to include a request that such a search be made, and all documents so retrieved be produced. Documents which have been deleted shall be identified and described with sufficient particularity as to understand the nature of the contents of the document, or shall be produced if they are available from backup tapes or other storage media.

6. As used herein, the term “communication” refers to any and all verbal communications, personal conferences, meetings, correspondence, written documents, electronic messages and e-mail, or other exchange of information between two or more persons or entities. Electronic messages which have been deleted shall be identified and described with sufficient particularity as to understand the nature of the contents of the document, or shall be produced if they are available from backup tapes or other storage media.

7. As used herein, the term “relating to” means to embody, comprise, represent, refer to, comment on, summarize, pertain to, concern, constitute, reflect, report on, result from, or set forth in any way the specified subject matter.

8. Where the identification of a person is required, such identification shall include the name, present or last known home address, present or last known business address, telephone number (including area code), title or occupation, and employer. Where the person identified is a corporation, firm or other entity, such identification shall also include the name of each individual connected with that corporation, firm or entity with whom contact was made, the present or last known home address of such person, the present or last known business address of such person, telephone number (including area code), and the title or occupation of such person.

9. Where the identification of a document is required, such identification shall include the name of the author or originator, the name of each addressee, including the addressee of any copy, the date which the document bears, a general description of its contents, the nature of the document (*e.g.*, letter, memorandum, telegram, etc.) and the name of the present custodian of the original or originals and each copy thereof bearing any marking or notation not found on the original. In lieu of identifying a document, you may attach a copy of the original and a copy of any non-identical copies to your answers to these Interrogatories. If you are referring to a document that is already in Plaintiff's possession, there is no need to reproduce it; however, you are instructed to identify and described the document with sufficient particularity such that Plaintiff can properly identify it among his records.

10. As used herein, the singular of any word or phrase includes the plural.

11. As used herein, masculine pronouns should be construed to include their female pronoun equivalent where appropriate.

12. As used herein, the term "or" means and/or, and the term "and" means and/or.

13. For each item which you contend is privileged or otherwise excludable from discovery, the basis for such claim or privilege or other ground for exclusion shall be stated and

the item identified with sufficient particularity to permit your claim of privilege or other ground for exclusion to be heard by the Court.

14. These Requests for Production of Documents are continuing in nature and should be supplemented immediately upon the receipt by you of any knowledge or information that changes or alters in any way any response provided. Further, any document obtained or located subsequent to production which should have been produced had it been available, or its existence known at the time, is to be supplied forthwith.

SPECIFIC REQUESTS

1. Produce all documents submitted by the Service Employees International Union, Virginia Local 512 (“SEIU”) during the time period of December 1, 2024, through March 1, 2025, representing its petition for certification as the exclusive collective bargaining representative for General County employees of Fairfax County.

RESPONSE:


2. Produce all communications between the County and the Service Employees International Union, Virginia Local 512 (“SEIU”) during the time period of December 1, 2024, through the present pertaining to the SEIU’s petition for certification as the exclusive collective bargaining representative for General County employees of Fairfax County.

RESPONSE:

3. Produce all communications between the County and defendant Espinosa, the Labor Relations Administrator (“LRA”), during the time period of December 1, 2024, through the present, regarding the petition for certification as the exclusive collective bargaining representative for General County employees of Fairfax County, filed by Service Employees International Union, Virginia Local 512 (“SEIU”).

RESPONSE:

Respectfully submitted,



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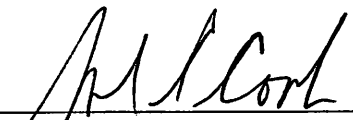
CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I served a copy of the foregoing Requests for Production of Documents via email, and first class mail, this 17th day of March, 2025 to:

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John C. Cook