

UNITED STATES DISTRICT COURT
DISTRICT OF RHODE ISLAND

EDWARD A. CANIGLIA,
Plaintiff

v.

ROBERT F. STROM as the Finance Director of
THE CITY OF CRANSTON, et al.
Defendants

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C.A. No. 15-525

PLAINTIFF'S ANSWERS TO
DEFENDANT CITY OF CRANSTON'S INTERROGATORIES

Interrogatory No. 1: Please set forth your full name, present residence address, date of birth, educational background and employment, if any.

Answer No. 1: Edward Anthony Caniglia, 2300 Cranston Street, Cranston, Rhode Island; DOB 8/21/1950; bachelor's degree from Rhode Island College, masters of business administration courses from Bryant University. I worked until I retired in 2015.

Interrogatory No. 2: Please set forth your employment history from 2010 through 2016.

Answer No. 2: I worked for E.C. Painting & Remodeling until I retired in 2015.

Interrogatory No. 3: Please state the names, present addresses and telephone numbers of any and all persons whom you believe to have any knowledge or information pertaining to the matters set forth in the Amended Verified Complaint ("Complaint"), its causes or consequences, or who may testify in this matter, and set forth what information you know or believe such person or persons have and how such person or persons acquired such knowledge.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information from third parties who are not a party to this action.

Answer No. 3: Without waiving said objections and subject to them, please refer to the information contained in the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto.

Interrogatory No. 4: Please state the names and present addresses of those persons who have given you, or any person, firm or corporation acting on your behalf, statements, reports, voice recordings or memoranda, relating to the matters set forth in the Complaint, its causes or consequences, and please provide the date of each item, and the name and address of the person, firm or corporation having present possession or custody of such item.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome.

Answer No. 4: Without waiving said objections and subject to them, please refer to the information contained in the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto.

Interrogatory No. 5: If any such statement, report or voice recording identified in the answer to the preceding Interrogatory has been communicated by or reduced to writing, identify such written record stating the names and addresses of the person or persons who gave and took them, and the name and present address of the person having present custody of same.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome.

Answer No. 5: Without waiving said objections and subject to them, please refer to the information contained in the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto.

Interrogatory No. 6: Please list all other items that may be material or relevant to your proof, including any photographs, diagrams, surveys or exhibits. As to all of these items, identify each, the date taken or made and by whom, and the name and address of the person having present custody of same.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome.

Answer No. 6: Without waiving said objections and subject to them, please refer to the information contained in the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto, the documents produced in Plaintiff's Response to Defendant's Request for Production of Documents, and the audio recording of Kim Caniglia's telephone call to the Cranston Police Department on August 21, 2015.

Interrogatory No. 7: Please state all communications you, your representatives or agents have had with the City of Cranston (including but not limited to the Cranston Police Department) or any of its agents and/or employees, related to the matters set forth in the Complaint, specifying the date of each such communication and name and address of each person who participated in or who witnessed each communication.

Answer No. 7: Please refer to the information contained in the Amended Verified Complaint, the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto, the affidavit of Kim Caniglia, and the audio recording of her call to the Cranston Police Department on August 21, 2015.

In addition, when the Cranston police called me on August 21, 2015, I asked to speak with my wife. They said she was not available. When the Cranston police came to my house, I was

drinking coffee on my back deck. They knocked on the front door. I called out that I was in the back yard. Four police officers came to the back of the office. They told me not to move and they had their hands on their guns.

The officers said they were there to check on my well-being. They asked about the incident with my wife the previous evening. I told them what had happened and explained that my wife had overreacted to the incident. At about this time, my wife walked up to the back deck. I said: "What's going on, Kimmie." The officers told her to wait by her car. I told the officers I needed to take my blood pressure medication.

The officers said that in "cases like this," they would confiscate all the firearms in the house unless I agree to a mental health evaluation. They said they took what I did as a threat to commit suicide. They asked about my mental health. I said that was none of their business.

The police officers said the Cranston rescue personnel would do an initial evaluation and decide whether I should go to a hospital. However, the rescue personnel denied that they did any evaluation. One rescue officer said "we're just transportation." While I was sitting in the rescue one of the police officers asked me if I had any weapons on me. I said he had a pocket knife. The police officer took the pocket knife. A little later, he returned it. Then, the rescue personnel took me to Kent Hospital as directed by the police officers.

Interrogatory No. 8: Please state all communications you, your representatives or agents have had with any third party related to the matters set forth in the Complaint, specifying the date of each such communication, the form, written or oral, the sum and substance of each such communication and name and address of each person who participated in or who witnessed each communication.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Interrogatory on the grounds it seeks information which are protected from discovery by the attorney-client privilege as this request would include all communications between Plaintiff and his attorneys.

Answer No. 8: Without waiving said objections and subject to them, please see the response to Interrogatory No. 7.

Interrogatory No. 9: Please give a complete, itemized statement of all monetary damages, property damages, and/or consequential damages which you allege to have sustained as a result of the matters set forth in your Complaint, including a description of how those damages were calculated.

Answer No. 9: Please refer to the information contained in the documents produced in Plaintiff's Rule 26 Initial Disclosures and any supplements thereto.

Interrogatory No. 10: Please identify any lawsuits, including but not limited to any civil or criminal matters you have been involved in, either as a Plaintiff or a Defendant, and please include the name of the suit, the date, the jurisdiction and the ultimate disposition.

Answer No. 10: None.

Interrogatory No. 11: Please list any and all drugs, prescribed or not, that you had consumed in the forty-eight (48) hours prior and up and until the incident described in your complaint that occurred on or about August 21, 2015.

Answer No. 11: I took blood pressure medication.

Interrogatory No. 12: Please list any and all alcoholic beverages that you had consumed in the twenty-four (24) hours prior and up and until the incident described in your complaint that occurred on or about August 21, 2015.

Answer No. 12: I consume 2-3 beers a day. I may have had a shot of whiskey after my wife left the house that evening.

Interrogatory No. 13: Please list any and all medical professionals, including but not limited to psychological professionals, you visited for the three years preceding the date of the incident described in your Complaint that occurred on or about August 21, 2015, please include the name of the professional, the location, the date visited, and the reason for the visit.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is confidential and/or otherwise protected from discovery.

Answer No. 13: Without waiving said objections and subject to them, I have never seen any psychological professionals.

Interrogatory No. 14: Please list any and all medical professionals, including but not limited to psychological professionals, you visited from the date of the incident described in your complaint that occurred on or about August 21, 2015, up until December 31, 2016, please include the name of the professional, the location, the date visited and the reason for the visit.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is confidential and/or otherwise protected from discovery.

Answer No. 14: Without waiving any objection and subject to them, I have never seen any psychological professionals.

Interrogatory No. 15: Please list any and all gun licenses or permits you have legally obtained from 2023 to the present.

Objection: Plaintiff objects to this Interrogatory on the grounds it is overly broad, vague and unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Answer No. 15: Without waiving said objections and subject to them, I have had a so-called "blue card" issued by the State of Rhode Island since 1989.

Interrogatory No. 16: Please list any and all instances where your gun license or permit was suspended, please include the date, and how long it was suspended for.

Answer No. 16: My "blue card" has never been suspended.

Interrogatory No. 17: Please state all communications your wife, Mrs. Kim Caniglia, her representatives or agents have had with the City of Cranston (including but not limited to the Cranston Police Department) or any of its agents and/or employees, related to the matters set forth in the Complaint, specifying the date of each such communication, the form, written or oral, the sum and substance of each such communication and name and address of each person who participated in or who witnessed each communication.

Answer No. 17: Please see the affidavit of Kim Caniglia and the recording of her phone call on August 21, 2015 to the Cranston Police Department.


Interrogatory No. 18: Please list the sum you paid for each gun (and the date you purchased the gun or otherwise gained possession of it) as described in paragraph 17 of your Complaint.

Objection: Plaintiff objects to this Interrogatory on the grounds it is unduly burdensome. Plaintiff further objects to this Interrogatory on the grounds it seeks information which is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence.

Answer No. 18: Without waiving said objections and subject to them, I paid approximately \$300 for each gun in the early 1980s.

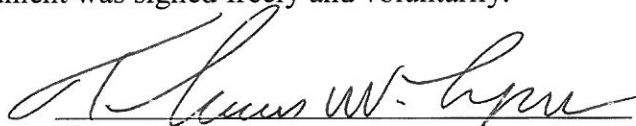
Interrogatory No. 19: Please list, describe and define the health issues and the financial constraints you experienced as alleged in paragraph 53 of your Complaint.

Answer No. 19: Shortly after the incident on August 21, 2015, I was diagnosed with lung cancer and underwent extensive treatment for that. Financial issues were not a constraint.


Edward A. Caniglia

STATE OF RHODE ISLAND
COUNTY OF PROVIDENCE

On June 9, 2018, before me, the undersigned notary public,
personally appeared Edward Caniglia, personally known to the
notary or proved to the notary through satisfactory evidence of identification, which was
R.I. driver's licence, to be the person who signed above in my presence, and who
swore or affirmed to the notary this document was signed freely and voluntarily.

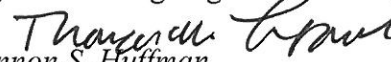

Notary Public
My commission expires: 4/26/2022
Notary Identification Number: 23342

As to objections,
EDWARD A. CANGLIA
By his attorneys,

/s/ Thomas W. Lyons
Thomas W. Lyons #2946
Rhiannon S. Huffman #8642
RHODE ISLAND AFFILIATE,
AMERICAN CIVIL LIBERTIES UNION
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CERTIFICATION

I hereby certify that on June 9, 2018, a copy of the foregoing was served by
email on Mark DeSisto, Esq., counsel for defendants.


/s/ Rhiannon S. Huffman
~~Rhiannon S. Huffman~~ 