

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NORTH CAROLINA

EDGAR ALLEN PETERSON IV,)
)
 Plaintiff,)
) No. 7:23-cv-01576-M
 v.)
)
 UNITED STATES OF AMERICA,)
)
 Defendant.)

**PLAINTIFF, EDGAR PETERSON'S ANSWERS TO DEFENDANT, UNITED STATES',
FIRST SET OF INTERROGATORIES**

COMES NOW, EDGAR ALLEN PETERSON IV, by and through undersigned counsel, hereby gives notice of serving answers to Defendant, UNITED STATES OF AMERICA, First Set of Interrogatories to Plaintiff, dated January 25, 2024 and states:

Interrogatory 1:

Provide all current and previous addresses Plaintiff has resided for more than thirty (30) days and whether each location was owned or leased.

Response:

1509 Goodbar Avenue
Memphis, TN 38104
Owned.

1896 Peabody Avenue
Peabody Place, Apt. C
Memphis, TN 38104
Leased.

622 Watson
Memphis, TN 38111
Owned.



1200 Bristol Drive, Apt. 301
Memphis, TN 38138
Leased.

U.S. Marine Corps Base
Camp Lejeune, N.C.
B.O.Q.
Building number and room number unknown.
Neither owned or leased.

U.S. Marine Corps Base
Camp Lejeune, N.C.
M.O.Q. 3334.
Neither owned or leased.

Civilian apartment.
Jacksonville, N.C.
Do not recall the name of the apartment complex or the apartment number.
Leased.

Civilian apartment.
Wilmington, N.C.
Do not recall the name of the apartment complex or the apartment number.
Leased.

U.S. Marine Corps Base
Quantico, VA.
B.O.Q.
Do not recall Room number.
Neither owned or leased.

3805 Carnes Avenue 'C'
Memphis, TN 38111
Leased.

4899 Bondale Avenue
Memphis, TN. 38118.
Owned by my parents.

1892 Sea Isle
Memphis, TN 38117.
Owned by my parents, as I was 14 years old when I lived at this address.

Interrogatory 2:

Provide the name of all current and former spouses of Plaintiff and dates of marriage.

Response:

Lori Lee Galey Peterson.
D.O.B.: 12/13/1958.
Married on May 7, 1983.
1509 Goodbar Avenue
Memphis, TN 38104.
901-361-4435.

Barbara Gail Clemons.
Deceased in 2018.
Married on May 19, 1973.
Divorced in Shelby County, Tennessee. Cannot recall or locate Court, date or docket number.

Interrogatory 3:

Provide the name, address, occupation, and marital status of all natural, step, foster, or adopted children.

Response:

Galey Brooks Peterson Grimes
3750 Lake Village Cove
Olive Branch, MS 38654
901-361-4438
Interior Designer.
Married.

Grace Claire Peterson
743 Velma
Memphis, TN 38104
901-361-4437
Mental health counselor.
Single.

Interrogatory 4:

Provide the name, address, occupation, and marital status of all siblings, including deceased siblings.

Response:

Brother: James Brooks Peterson, Jr.
D.O.B.: 10/10/1946.
Deceased in 2001. Cause of death was due to complications of H.I.V.
Divorced.
Employed by American Express.

Sister: Laura Lee Peterson Ferguson.
D.O.B: 08/25/1952.
Deceased in 2002. Cause of death was leukemia.
Divorced.
Employed by Graceland Enterprises.

Brother: David Clarke Peterson.
D.O.B.: 08/18/1955.
Single.
Unemployed/ Disabled.
Since August of 2022, resides at Bright Glade Nursing Facility
5070 Sanderlin Drive
Memphis, TN 38117
901-682-5677.

Interrogatory 5:

Provide the full name, address, occupation, and, if deceased, cause of death of Plaintiff's parents.

Response:

Father: James Brooks Peterson, Sr.,
DOB: 1/19/1921.
Deceased in 2010. Cause of death was a stroke.
Resided at 4906 Leven Rd
Memphis, TN 38118.
Employed in finance.
Retired.

Mother: Maridecine Clarke Peterson.
DOB: 12/28/1919.
Deceased in 2012. Cause of death was dehydration.
Resided at 4906 Leven Rd.
Memphis, TN 38118.
She was a housewife.

Interrogatory 6:

Identify all current dependents of Plaintiff.

Response:

Lori Lee Galey Peterson. Please see relevant information provided in Response to Interrogatory # 2.

Interrogatory 7:

Provide name and address of all educational institutions Plaintiff attended and dates of attendance for each.

Response:

University of Memphis School of Law
1 N. Front Street
Memphis, TN 30103
901-678-2421
1971-1973.

Memphis State University
3720 Alumni Avenue
Memphis, TN 38152
901-678-2000
1966-1971.

Overton High
Lanier Lane
Memphis, TN 38117
901-416-2136
1964-1966. 1770.

Colonial Junior High
1370 Colonial Road
Memphis, TN 38117
901-416-8980
1963-1964.

Jackson Junior High
10600 Indian School Road
Albuquerque, NM 87112
505-291-6834
1961-1963.

I attended several elementary schools between the years 1955-1962, but I cannot recall any of their names and/or addresses.

Interrogatory 8:

List the degree received at each educational institution Plaintiff attended.

Response:

Juris Doctorate from University of Memphis School of Law.

Bachelor of Science from Memphis State University.

Diploma from Overton High.

Interrogatory 9:

List all technical licenses Plaintiff has received.

Response:

I have never been awarded, nor have I obtained any technical license. I have held law licenses from the States of Tennessee and Colorado.

Interrogatory 10:

Identify the branch of the military Plaintiff served and the years of service.

Response:

United States Marine Corps; 1974-1977.

Interrogatory 11:

Identify the rank Plaintiff entered service and, if subsequent ranks were achieved, provide the rank and date achieved for each.

Response:

First Lieutenant. My recollection is that I was promoted to Captain on May 5, 1976. The DD-214 Form states that the promotion to Captain was on May 1, 1976.

Interrogatory 12:

Identify the date Plaintiff first arrived at Camp Lejeune and the purpose for arrival at Camp Lejeune.

Response:

May 9, 1975; To complete any mission assigned to me.

Interrogatory 13:

Identify the last date Plaintiff was at Camp Lejeune and the purpose for departure from Camp Lejeune.

Response:

My recollection is April 12, 1977 or April 22, 1977. I was told to go away.

Interrogatory 14:

Identify any absences and the purpose for any absences during Plaintiff's time stationed at Camp Lejeune.

Response:

Although I cannot recall or recollect the specific dates that my feet were not in contact with the ground at CLNC, I do recall that part of my duties involved the scheduling of court-martial demonstrations at several law schools.

I would have also exercised my right to entitled leave (vacation) days; and I would have departed CLNC for other environs. I do recall a two-day trip to Charolette, NC, to rock with the Rolling Stones.

Interrogatory 15:

Identify all addresses Plaintiff resided at Camp Lejeune.

Response:

Please see response to Interrogatory #1.

Interrogatory 16:

Provide all Military Occupational Specialty (“MOS”) numbers assigned to Plaintiff during service.

Response:

4401 and 4402.

Interrogatory 17:

Provide a description of Plaintiff’s professional responsibilities and duties for each MOS.

Response:

To complete any assigned mission(s).

Interrogatory 18:

Identify all military base locations Plaintiff was stationed, worked at, or visited during Plaintiff’s service.

Response:

U.S. Marine Corps Base, Quantico, VA
U.S. Naval Base, Newport, RI
U.S. Marine Corps Base, Camp Lejeune, N.C.
U.S. Marine Corps Recruit Depot, Parris Island, South Carolina.
U.S. Marine Air Station, Cherry Point, NC
U.S. Air Force Base, Charleston, SC
U.S. Naval Base, Millington, TN

Interrogatory 19:

If enlisted, identify the date, place, and type of discharge Plaintiff received.

Response:

Not applicable.

Interrogatory 20:

If an officer, identify the date of resignation and reason identified in the letter of intent to resign.

Response:

I never resigned my Commission.

Interrogatory 21:

Describe any administrative investigations, military justice investigations, or UCMJ investigations Plaintiff was the subject of.

Response:

None.

Interrogatory 22:

Provide the monthly amount of any military pension Plaintiff receives and when Plaintiff began receiving the pension.

Response:

I receive no military pension.

Interrogatory 23:

Describe the location, date, and reason for any deployment during service.

Response:

I was never deployed.

Interrogatory 24:

Provide the name, address, nature of business, and dates of employment of all positions Plaintiff has held.

Response:

Associate attorney.
The Hardison Law Firm
119 S. Main Street
Memphis, TN 38104
901-525-8776
Civil litigation.
2001-2003.
\$82,500 annually.

Special Assistant U.S. Attorney

167 North Main Street #800
Memphis, TN 38103
To do justice.
901-544-4231
1994-1995.
Non-compensated.

Assistant District Attorney General
30th Judicial District
201 Poplar Avenue
Memphis, TN 38104
To do justice.
1977-2001.
\$85,000 annually.

U.S. Marine Corps.
As described throughout this document.

Psychiatric Technician.
865 Poplar Avenue
Memphis, TN 38104
Tend to patients.
1970-1974.
\$1,000.00 Monthly.

Line Worker
Cleo Wrap
Viscount Avenue
Memphis, TN

Box folder.
Summers of 1967-1969.
\$1.75 Hourly.

Interrogatory 25:

Identify the date, position held, and annual salary or hourly rate at the time of Plaintiff's retirement.

Response:

I did not retire from The Hardison Law Firm, as I was dismissed from my final place of employment.

Please see above items for additional information.

Interrogatory 26:

Identify any clubs, fraternal organizations, churches, or civic associations Plaintiff is a member of.

Response:

Christ United Methodist Church. Poplar Avenue, Memphis, TN 38117.

Interrogatory 27:

Identify the date Plaintiff was diagnosed with Parkinson's Disease.

Response:

July 2001.

Interrogatory 28:

Identify the name, address, and title of the medical professional that diagnosed Plaintiff with Parkinson's Disease.

Response:

Dr. Tulio Bertorini, M.D.
Semmes-Murphee Clinic.
6325 Humphreys Blvd
Memphis, TN 38120.
901-522-7700.

Interrogatory 29:

Identify all medications, prescribed or otherwise, and doses Plaintiff is currently taking.

Response:

Carbodopa/Levodopa 25/100 6x daily.
Repinorole 4mg. 6x daily
Sertraline 50mg. 1x daily
Azilect 1mg. 1x daily
Omeprazole 40mg 1x ddaily
Loratadine 10mg 1x daily
Vitamin D 5000 ius 1x daily
Triamterene 37.5mg 1x daily
Orgovyx 150mg 1x daily
Citracal+D3 1x daily

Interrogatory 30:

Identify all treating physicians, name of medical group, and city and state where treatment was received.

Response:

Tulio Bertorini, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Farah Atassi, M.D.
Houston Methodist Hospital.
Houston, TX

Eugene Lai, M.D.
Houston Methodist Hospital.
Houston, TX

Lance Wright, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Aaron Bond, M.D.
Semmes Murphey Clinic.
Memphis, TN

Vishad Kumar, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Micheal Lattimore, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Shelly Thannum, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Karl Sillay, M.D.
Semmes-Murphey Clinic.
Memphis, TN

Richard K. Simpson, Jr., M.D.
Baylor St. Luke's Medical Center.

Houston, TX

Mark LeDoux, M.D., PhD .
Veracity Neuroscience, LLC.
Memphis, TN

Shawn Hayden, M.D.
Midsouth Independent Group.
Memphis, TN

Rachel Stein, D.O.
Methodist University Hospital.
Memphis, TN

Christopher Sands, M.D.
Methodist University Hospital.
Memphis, TN

Brienna Bivens, M.D.
Methodist University Hospital.
Memphis, TN

Benjamin Beatus, Jr., M.D.
Lakeside Behavioral Health System.
Memphis, TN

Joseph E. Allen, II, M.D.
Sanders Clinic.
Memphis, TN

Guy Voeller, M.D.
University of TN Health Sciences Center.
Memphis, TN

Interrogatory 31:

Provide a description of all damages, including but not limited to economic, medical, non-medical, Plaintiff is seeking in the above-captioned matter.

Response:

I was terminated from my Associate Attorney position with The Hardison Law Firm suffering a staggering Loss of Income. I have lost the ability to walk.. I cannot speak coherently. I have lost my sense of smell. I can no longer produce a discernible writing in print or cursive. I lost my independence upon the voluntary surrender of my Tennessee driver's license.

I had brain surgery as required by my voluntary, non-compensated participation in VA Co-operative Study CSP #468, involving Deep Brain Stimulation (DBS). My participation in this clinical trial, that necessitated several non-reimbursable trips to Houston, Texas, exhibited the pinnacle of irony since it was "an extremely important study" for the government which caused my condition in the first place.

Medical expenses, to include, but not be limited to surgeries, travel, the assorted expenses of travel, medications and treatments and any and all assorted necessary expenses. I have had six or seven surgical procedures to replace my DBS battery. I anticipate several future surgeries to replace my DBS battery.

I experienced a three (3) month-long psychotic episode. I spent one (1) night in the Memphis Police Department Crisis Intervention room. I spent ten (10) days and nights at Lakeside Behavioral Hospital.

I fall frequently with resulting injuries. On two occasions approximately eighteen months ago, I fell in public and "Help! I can't get up!" Several good Samaritans came to my rescue, with one occasion being in the middle of a busy Memphis street.

I don't get to hold my toddler grandson or infant granddaughter for fear that I may drop them.

I have experienced disastrous levels of compulsive behavior. I move incredibly slowly. I cannot protect my family. Loss of consortium. Can't relive the past 20 years. The thought that the worst is yet to appear.

Interrogatory 32:

Identify all civil or criminal suits Plaintiff is or has been a party to, including both ongoing matters and closed matters.

Response:

Divorce proceedings as mentioned supra.

Interrogatory 33:

Identify any disability claims Plaintiff has filed with any state or federal agency.

Response:

Social Security Administration (SSA)
Department of Veterans Affairs (VA).

Interrogatory 34:

Identify the amount and source of any disability or social security benefits Plaintiff is currently receiving.

Response:

Department of Veterans Affairs (VA): \$4224.99.
Social Security Administration (SSA) \$3,261.70.

VERIFICATION

I, Edgar Allen Peterson, am over eighteen (18) years of age and I reside in Memphis, Tennessee. I verify that the foregoing Responses to Defendant's First Set of Interrogatories to Plaintiff are true and correct to the best of my knowledge, information and belief.



Edgar Allen Peterson

Dated:



J. Edward Bell
Attorney for Plaintiff

Dated:

CERTIFICATE OF SERVICE

This is to certify that on February 1, 2024, I served a copy of the foregoing document upon counsel for the Defendant by electronic mail per agreement with counsel at the following electronic mail address:

/s/ J. Edward Bell, III

J. Edward Bell

Dated: February 1, 2024