

IN THE IOWA DISTRICT COURT FOR POLK COUNTY

Jessica Nicole Henderson,

Plaintiff Pro Se,

Case No. 05771 LACL 164866

v.

M and B Scott Properties, LLC,
Andrew Kenneth Miles Scott,
Summer Lynn Scott,
Scott's Home Renewal, LLC
Timothy P. Hegwood,
Christopher Fisher, and
CF Consulting Corp, d/b/a PMI Realty Iowa,
and d/b/a Property Management Inc. – Central Iowa,
a/k/a PMI Central Iowa,

Interrogatories Propounded to Defendants,
M and B Scott Properties, LLC,
Andrew Kenneth Miles Scott,
Summer Lynn Scott, d/b/a
Scott's Home Renewal, LLC

Defendants.

COMES NOW the Plaintiff, Jessica Nicole Henderson, and hereby submits the following written interrogatories to be answered in writing under oath by Defendants, M and B Scott Properties, LLC, Andrew Kenneth Miles Scott, Summer Lynn Scott, d/b/a Scott's Home Renewal, LLC, in accordance with Rule 1.509 of the Iowa Rules of Civil Procedure. Where knowledge or information in your possession is requested, such request includes any knowledge possessed by your agents, representatives, and attorneys. If you obtain subsequent information indicating that an answer to these interrogatories was incorrect when made or that an answer, though correct when made, is no longer correct, your answers must be amended or changed accordingly. Failure to amend would constitute knowing concealment. You are further advised of your duty to supplement your answers as provided under Rule 1.503(4) of the Iowa Rules of Civil Procedure.

You are hereby notified that at the commencement of the trial of this case, the undersigned will ask the Court for an order precluding you from introducing evidence relating to the subject matter of these interrogatories which has not been disclosed by your responses.

I. INSTRUCTIONS

- A. In each response to these interrogatories, provide all information in your possession, custody or control. If you are able or willing to provide only part of the information sought, specify the reason for your inability or unwillingness to provide the remainder.
- B. If you decline to answer any portion of an interrogatory, provide all information called for by the balance of the interrogatory. If you object to any portion of an interrogatory on any ground, provide all information called for which is conceivably discoverable.
- C. Every interrogatory herein is continuing in nature. Promptly provide all additional, responsive information hereafter obtained. You are specifically advised of your duty to supplement responses falling within the categories described in Iowa Rule of Civil Procedure 1.503(4).
- D. Where knowledge or information in your possession is requested, such request includes knowledge of your agents, representatives, and, unless privileged, your attorneys.
- E. If any privilege is claimed with respect to any communication or document, identify the communication or document in detail, including its date, author, and each addressee or recipient, describe its subject matter, and state the privilege claimed and the basis, therefore.

II. DEFINITIONS

- A. The singular and plural form of words and the words "and" and "or" shall be interpreted

interchangeably so as to bring within the scope of these interrogatories any relevant information which might otherwise be construed to be outside their scope.

- B. As used herein, "including" means including but not limited to.
- C. "Communication" means any transfer or exchange between two or more persons of any information, whether orally or in writing, including, but not limited to, personal conversations, correspondence, electronic messages via email or other means, and telephone calls, and includes all communications for which you may claim privilege.
- D. "Subject property" means the property located at 1713 Francis Avenue, Des Moines, Iowa 50314, which is the subject matter of this litigation.
- E. "Document" means the original and any nonidentical copy (whether different from the original by reason of notations, or otherwise) of any written, printed, typed, recorded, graphic or photographic matter, sound reproduction, tape, record or other device, and electronically stored information, however produced or reproduced including drafts and supporting statements. "Document" includes, but is not limited to, agreements, memoranda, records, letters, correspondence, communications, reports, manuals, brochures, schedules, books, newspapers, magazines, articles, applications, contracts, agreements, telephone logs, notes, handwritten notes, invoices, orders, price lists, check lists, checks, drafts, notices, instructions, statements, minutes, resolutions, tests, studies, experiments, telephone reports, notepads, desk calendars, graphs, charts, data sheets, processing cards, printouts, tape recordings, microfilm, microfiche, photographs, video tape recordings, magnetic recording media, computer printouts and any data compilations, or any other physical object. "Document" also means identical copies of unavailable original documents and of unavailable, nonidentical copies.

- F. "Electronically stored information" means information which has been electronically stored, that is, computer data in a computer-readable form, a data base, a file, and/or a record.
- G. When used in connection with a document, "identify" means to state its type (e.g., letter, memorandum, drawing, etc.), subject matter and date, by whom written or prepared, by whom signed, to whom sent, its present location (name and address of place), and the present custodian of the original and all copies thereof. If any such document was, but no longer is, in your possession or custody or subject to your control, state what disposition was made of it. In lieu of providing a list or otherwise identifying documents in your possession as requested, you may attach copies of the documents along with your answers to these interrogatories.
- H. When used in connection with a person, "identify" means to state the person's full name, current address and telephone number, the full name, current address and telephone number of the company, firm or other organization with which the person is affiliated or by whom the person is employed, and the person's position, title or job capacity at the date of your response and at the time covered by the interrogatory.
- I. When used in connection with an organization, "identify" means to state the full name and present address and telephone number of such organization, the names of its directors and officers, and its principal place of business and the nature of its business.
- J. When used in connection with a communication, "identify" means to state a brief description of the subject matter communicated, its date, the means of communication (e.g., personal conversation, correspondence, telephone), the place or places where it occurred, and to identify each person who participated in it.

- K. When used in connection with an action, occurrence or instance, "identify" means to describe what happened, when and where, and to identify each person involved.
- L. When used in connection with a person who may or will be called as a witness, "identify" means to state all facts as to which you expect each such person to testify and, in addition, to provide the information set forth in Paragraph G. above.
- M. "Person" includes a natural person, partnership, corporation, unincorporated business, group, governmental agency or agent, and any other organization or entity.
- N. The singular shall include the plural and the past shall tense shall include the present tense, and vice versa; the words "and" and "or" shall be both conjunctive or disjunctive; the word "all" means "any and all"; the word "any" means "any and all"; the word "including" means "including without limitation"; the word "he" or any other masculine pronoun includes any individual regardless of sex.

RESPECTFULLY SUBMITTED,

/s/ Jessica Henderson

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Attorney for Defendants, Timothy P. Hegwood, Christopher Fisher, and CT Consulting Corp,
d/b/a PMI Realty Iowa, and d/b/a Property Management Inc. – Central Iowa, a/k/a PMI Central
Iowa

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing instrument was served upon each of the attorneys of record for all Defendants to the above-entitled cause herein at their respective addresses disclosed on the pleadings of record on the 14th day of April, 2026.

By U.S. Mail Fax
 Hand Delivery Electronically through CM-ECF
 Private Carrier Other __ Email _____

Signature /s/ Jessica Henderson

INTERROGATORY NO. 1:

Identify each individual responding to or assisting in response to these Interrogatories, stating the following:

- a. Full name;
- b. Age, including birth date;
- c. Present residential address and phone number;
- d. Business address and phone number;
- e. All addresses where you have lived in the past ten years;
- f. Occupation, title and current employers or positions held within any business;
- g. The names, addresses and ownership information for each company or business you have owned or operated in the past ten years;
- h. Your relationship to this action;
- i. Your educational history including high school and post-secondary education including vocational training, college, university and other post-secondary education;
- j. A list of educational degrees, designations, certificates or licenses you hold, when they were obtained, and current status of each;
- k. Training programs, classes, tests, exams and other education you have completed in regard to the purchase or sale, ownership or management of real estate;
- l. Detailed history of your work experience and business ownership over the past ten years;
- m. The number of each interrogatory to which you answer or assist in answering.

ANSWER TO INTERROGATORY NO. 1:

INTERROGATORY NO. 2:

Provide detailed information regarding any business created or owned by Defendants over the past ten years, stating the following for each business:

- a. Full name;
- b. Date created or established;
- c. Type of legal entity for each business (C Corp, S Corp, LLC, LP, GP, LLP, Sole Proprietorship, d/b/a, a/k/a and all other types of businesses);
- d. Incorporated in which state;
- e. Names and titles of officers or other owners or managers of the business;
- f. Names and titles of board of directors;
- g. Registered agent name and address;
- h. Is the business still in operation;
- i. If the business has closed, what is the date it was closed;
- j. Current status of filings required by the Secretary of State's office;
- k. The year of each state and federal tax return filed for the business;
- l. The year and name of the state where each tax return was filed;
- m. The names and titles of the individuals who signed each state and federal tax return;
- n. Current status of tax filings;
- o. Does the business owe taxes or have delinquent taxes due;
- p. Has the business ever filed for bankruptcy; if the answer is yes, provide date of filing, date of final resolution, and a summary of the outcome.
- q. Are there any tax liens against the business.

INTERROGATORY NO. 3:

Is the defendant covered by any applicable policy of liability insurance that would cover the alleged damages which forms the basis of this lawsuit? If your answer is in the affirmative, please state the name and address of your insurer, the limits of your policy, and whether or not such policy was in force and effect at the time of the occurrence in question. Please note this Interrogatory inquires about both primary, excess coverage, and umbrella coverage, as well as any policy naming defendant as an additional named insured.

ANSWER TO INTERROGATORY NO. 3:

INTERROGATORY NO. 4:

Described in detail each and every statement, formal or informal, written or recorded made by Defendants or their employees concerning any issue in this litigation, for which no privilege is asserted. For each state:

- a. Name and address of the person making the statement;
- b. Date of statement;
- c. The substance of the statement;
- d. Whether the statement was written, recorded or transcribed; and
- e. Attach a copy of said statement.

ANSWER TO INTERROGATORY NO. 4:

INTERROGATORY NO. 5:

State whether you have ever been sued, a complaint has been submitted, or a claim has been made, for negligence in improperly addressing leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, non-function or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, broken pipes, structural problems, or remediation of water damage or mold at the subject property, before or after the alleged incident. If so, indicate for each such claim or suit:

- a. The name and address of the plaintiffs;
- b. The name and address of each of the other defendants;
- c. The date, court and docket number where suit was instituted;
- d. The name and address of the plaintiff's attorney;
- e. The name and address of your attorney;
- f. The name and address of each other defendant's attorney;
- g. The factual allegations of the plaintiffs;
- h. Whether the case was settled, tried to a verdict, or dismissed;
- i. The terms of any statement in the verdict, if there was one; and
- j. Whether any written statements, tape recordings, or depositions were taken.

ANSWER TO INTERROGATORY NO. 5:

INTERROGATORY NO. 6:

State whether you have ever been sued, a complaint has been submitted, or a claim has been made, for negligence in improperly addressing leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, non-function or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, broken pipes, structural problems, or remediation of water or mold at any property owned by you, before or after the alleged incident. If so, indicate for each such claim or suit:

- a. The name and address of the plaintiffs;
- b. The name and address of each of the other defendants;
- c. The date, court and docket number where suit was instituted;
- d. The name and address of the plaintiff's attorney;
- e. The name and address of your attorney;
- f. The name and address of each other defendant's attorney;
- g. The factual allegations of the plaintiffs;
- h. Whether the case was settled, tried to a verdict, or dismissed;
- i. The terms of any statement in the verdict, if there was one; and
- j. Whether any written statements, tape recordings, or depositions were taken.

ANSWER TO INTERROGATORY NO. 6:

INTERROGATORY NO. 7:

Please identify by name, address and telephone number each person you expect to call as a witness in this action. State the following with respect to each:

- a. Their full name, title, home and business address;
- b. The business name of the witness or of the witness' employer;
- c. The subject matter on which said witness is expected to testify;
- d. The substance of the facts and opinions to which each is expected to testify; and
- e. A summary of the grounds of each such opinion.

ANSWER TO INTERROGATORY NO. 7:

INTERROGATORY NO. 8:

Please identify each person you expect to call as an expert witness at trial and for each such person state:

- a. Name of the expert;
- b. Business and residential address;
- c. Area of expertise;
- d. Qualifications of the expert;
- e. The basis for opinions to be expressed;
- f. A copy of the expert's Curriculum Vitae (CV), and any report provided;
- g. The substance of opinions to be expressed at trial; and
- h. A copy of the expert's report when available.
- i. A signed copy of the Expert's Certification, using the format shown on the next page.

Expert witnesses have a duty to supplement their answers as provided under Rule 1.508(3) of the Iowa Rules of Civil Procedure. This duty extends to their report and to information given during the expert's deposition.

ANSWER TO INTERROGATORY NO. 8:

EXPERT CERTIFICATION (for response to Interrogatory No. 8). Provide this certification for each expert witness.

I state that I, as an expert retained in anticipation of litigation or for trial, have fully read the above answer relating to me, my qualifications, my mental impressions and opinions, and the facts known by me, and that I verify under penalty of perjury and pursuant to the laws of the State of Iowa that the above answer is true and correct.

_____ Date

_____ Signature

Printed name _____

Professional designation _____

Name of company _____

Title _____

Notice to expert witnesses: Expert witnesses have a duty to supplement their answers as provided under Rule 1.508(3) of the Iowa Rules of Civil Procedure. This duty extends to their report and to information given during the expert's deposition.

INTERROGATORY NO. 9:

List all experts whom you do NOT intend to call as a witness at trial if said expert's work product forms a basis, either in whole or in part, of any expert who is expected to be called as a witness. Your answer should include all experts whose notes or records have been furnished to experts who are intended to be called as witnesses at trial. For each such expert who will not be called to testify, please furnish the following:

- a. Full name, home and business address;
- b. Business name of the witness or employee;
- c. The expert's qualification as an expert on the subject matter;
- d. A copy of the expert's Curriculum Vitae (CV), (if the witness does not have a CV, provide a copy of the witness's Resume which includes a detailed work history), and
- e. The mental impressions and opinions held by the expert and the facts known to the expert (regardless of when the factual information was acquired) which relate to, or form the basis of, the mental impressions and opinions held by the expert.

ANSWER TO INTERROGATORY NO. 9:

INTERROGATORY NO. 10:

State whether or not you, your attorney, or agent have obtained the identity and location of the persons having knowledge or relevant facts regarding the matters alleged in the petition or complaint. If the answer is in the affirmative, for each state:

- a. The name and address of each individual having knowledge of relevant facts;
- b. The date upon which each individual was interviewed by defendant, his attorney or agent;
- c. The name and address of the interviewer;
- d. Whether said interview was conducted in written or recorded form;
- e. The present location of each written statement or audio/video recording; and
- f. The name and address of the custodian of each written or audio/video recording.

ANSWER TO INTERROGATORY NO. 10:

INTERROGATORY NO. 11:

State in full detail the factual basis for each affirmative defense by defendant in its answer to plaintiff's petition, and identify each statute, ordinance, regulation, rule, procedures, guideline, case, or other document, which forms a legal or factual basis for any affirmative defense, alleged by defendant in this matter.

ANSWER TO INTERROGATORY NO. 11:

INTERROGATORY NO. 12:

State in full detail the factual basis for each denial by defendant in its answer to plaintiff's petition, and identify each statute, ordinance, regulation, rule, procedures, guideline, case, or other document which forms a legal or factual basis for any denial of any count of the petition in this matter.

ANSWER TO INTERROGATORY NO. 12:

INTERROGATORY NO. 13:

Please state whether the Defendants have at any time had the Plaintiff under observation or surveillance. The terms observation and surveillance are used interchangeably in this Interrogatory and are intended as singular or plural, depending on the number of incidences involved. If so, state:

- a. The names and addresses of the individuals who had the Plaintiff under observation;
- b. The dates on which the observation occurred;
- c. The places where the observation took place;
- d. State whether the individual was acting on their own or as a representative of an employer or other party.
- e. The name, address, position, and employer of the person who hired or retained the persons who observed the Plaintiff;
- f. Whether the Defendants have obtained any photographs, motion pictures, or other visual representations by means of the observation;
- g. Whether the Defendants have obtained any sound recordings by means of the observation; and
- h. The name, address, and position of the person having possession of any of the aforesaid visual representations, sound recordings, or written reports.

ANSWER TO INTERROGATORY NO. 13:

INTERROGATORY NO. 14:

Provide a list of dates for every work order relating to the subject property over the past ten years. For each work order, include the date, the description of the work order, the name of the person who responded to the work order, and the action taken to remedy the problem.

ANSWER TO INTERROGATORY NO. 14:

INTERROGATORY NO. 15:

Identify all documents or other tangible items that you reasonably expect to offer into evidence in this matter, and list the current custodian of each such item.

ANSWER TO INTERROGATORY NO. 15:

INTERROGATORY NO. 16:

Please state in full detail, including the date of original involvement, a summary or timeline of the events surrounding any and all damages to the subject property over the past ten years, including your involvement therein, and, what efforts you or your company engaged in to inspect, analyze, evaluate, test, repair, or remediate the home.

ANSWER TO INTERROGATORY NO. 16:

INTERROGATORY NO. 17

Identify all individuals employed by or affiliated with the Defendants who have worked on the subject property and explain in what capacity they worked on the property.

ANSWER TO INTERROGATORY NO. 17:

INTERROGATORY NO. 18

If individuals are identified by initials or abbreviations or abbreviations are used in the documents provided by the Defendants, identify each such individual by full name, or provide an explanation of the abbreviation.

ANSWER TO INTERROGATORY NO. 18:

INTERROGATORY NO. 19

Identify all instances of leaks, water intrusion, improper drainage, water damage, flooding, mold growth, fungi, sewage backing up into the basement (including malfunction, non-function or backup of the sump pump), bacterial contamination, cracks in the walls on the main floor, cracks or bowing in the basement floor or walls, broken pipes, structural problems, or remediation of water or mold at the subject property over the past ten years, and provide the details of any insurance claims made related to these conditions at the subject property.

ANSWER TO INTERROGATORY NO. 19:

INTERROGATORY NO. 20

Describe all communications with any tenants who occupied the subject property prior to tenancy by this Plaintiff, Jessica Henderson, regarding unsafe, unsanitary, or uninhabitable conditions in the property, and describe steps taken to inspect the subject property and any repairs made prior to Plaintiff's tenancy.

ANSWER TO INTERROGATORY NO. 20:

INTERROGATORY NO. 21

Identify all individuals who have inspected or evaluated the subject property over the past ten years. Include all inspections or evaluations by government officials, housing inspectors, code enforcement officials, and others who work in a similar capacity.

- a. The full name of the individual;
- b. Age, including birth date;
- c. Present residential address and phone number;
- d. Business address and phone number;
- e. Occupation, title and current employer(s);
- f. Curriculum Vitae (CV) for each person. If a CV is not available, provide a Resume that includes a detailed work history and any licenses or certifications.
- g. The details of their findings and the recommended action steps;
- h. The defendants' response to those findings and recommendations;
- i. Any follow-up responses or actions taken.

ANSWER TO INTERROGATORY NO. 21:

INTERROGATORY NO. 22

Provide information regarding any sampling, testing, or environmental inspections of the subject property over the past ten years, including

- a. Date
- b. Name, title and credentials of the person performing the work
- c. Name and address of the company who employed that individual
- d. Method
- e. Results

ANSWER TO INTERROGATORY NO. 22:

INTERROGATORY 23:

Provide a list of all properties owned, leased or managed by Defendants, in their individual names or in the name of a trust or other legal entity on behalf of the Defendants, in the state of Iowa in the past ten years, and provide the following details for each property:

- a. The full name of owner(s) at the time of purchase;
- b. The date of purchase;
- c. The amount paid at the time of purchase;
- d. The current name of the individual owner(s), or the name of the trust or other legal entity that owns the property on behalf of the Defendants;
- e. Current amount owed on the mortgage;
- f. District/Parcel number;
- g. Geoparcels;
- h. Complete address, including street address, city, county, state, and zip code;
- i. If the Defendants no longer owns a property on this list, provide the date of sale, sale price, and name of buyer.
- j. If a property on this list was transferred to the name of a trust or other legal entity on behalf of the Defendants, provide the date of the transfer, name of the trust, and the amount of consideration paid.
- k. If a property on this list was sold or transferred to a friend, coworker or family member of Defendant in the past ten years, provide the date of the transfer, name of the new owner, and the amount of consideration paid.

ANSWER TO INTERROGATORY NO. 23:

INTERROGATORY 24:

Provide a list showing the dates and actions taken for any property owned by defendants in the past ten years where the property was reported, identified or marked as uninhabitable, unsafe, unsanitary or condemned by anyone in an official capacity with the city, state or federal government.

- l. The full name of the individual who made those decisions;
- m. Age, including birth date;
- n. Present residential address and phone number;
- o. Business address and phone number;
- p. Occupation, title and current employer(s);
- q. Curriculum Vitae (CV) for each person. If a CV is not available, provide a Resume that includes a detailed work history and any licenses or certifications.
- r. The details of their findings and the recommended action steps;
- s. The defendant's response to those findings and recommendations;
- t. Any follow-up responses or actions taken.

ANSWER TO INTERROGATORY NO. 24:

INTERROGATORY 25:

If the defendant has lost their rental license or has been issued a warning about safety or habitability, or potential loss of the rental license on any of their real estate holdings in the past ten years, provide a list with the following details.

- a. The full name of the individual who made those decisions;
- b. Age, including birth date;
- c. Present residential address and phone number;
- d. Business address and phone number;
- e. Occupation, title and current employer(s);
- f. Curriculum Vitae (CV) for each person. If a CV is not available, provide a Resume that includes a detailed work history and any licenses or certifications.
- g. The details of their findings and the recommended action steps;
- h. The defendant's response to those findings and recommendations;
- i. Any follow-up responses or actions taken.

ANSWER TO INTERROGATORY NO. 25:

INTERROGATORY NO. 26

For each individual who has knowledge concerning the claims of the plaintiff in this matter, or defenses thereto, please state:

- a. The full name of the individual;
- b. Age, including birth date;
- c. Present residential address and phone number;
- d. Business address and phone number;
- e. Occupation, title and current employer(s);
- f. A summary of the factual information they would testify to if called to testify at trial or by way of deposition in this matter; and
- g. If the individual relies upon documentary evidence, what evidence do they rely upon.

ANSWER TO INTERROGATORY 26:

VERIFICATION BY DEFENDANTS

I hereby certify under penalty of perjury and pursuant to the laws of the State of Iowa that I have read the above and following Answers to Interrogatories and that said answers are true and correct as I verily believe.

Dated: _____

Officer Name _____

Officer Title _____

Defendant, M and B Scott Properties, LLC

Dated: _____

Defendant, Andrew Kenneth Michael Scott

Dated: _____

Defendant, Summer Lynn Scott

Dated: _____

Officer Name _____

Officer Title _____

Defendant, Scott's Home Renewal, LLC