

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

JOHN B. PICCHI,	)	
	)	
Plaintiff,	)	
	)	Civil Action No.: 06 193 (KAJ)
v.	)	
	)	JURY TRIAL DEMANDED
SUMMIT NORTH MARINA, Inc.,	)	
	)	
Defendant.	)	

**DEFENDANT'S ANSWERS TO JOHN B. PICCHI'S
FIRST SET OF INTERROGATORIES**

1. The name and job description of all employees and/or independent contractors, working for Summit North at the Marina on February 2, 3, and 4, 2003. If they are no longer employed by the Marina, please provide the last known address.

ANSWER: Charles Graves, travel lift operator; maintenance;
Christopher Lloyd, maintenance, currently general manager;
Benjamin Bauer, maintenance;
Keith King, maintenance;
Janice Trala, general manager, no longer employed. Last known address, 102 Fairmont Drive, Bear, Delaware, 19701; and
Larry Holden, maintenance, no longer employed. Last known address, New Castle, Delaware.

2. The name, job description and contact information for the individual operating the Summit North Marina ice breaking vessel on February 4, 2003.

ANSWER: The ice breaking vessel was operated by Benjamin Bower, Keith King and Christopher Lloyd.

3. Names, addressed, telephone numbers, and vessel identification numbers of all vessel owners docked at Summit North Marina in February of 2003.

ANSWER: See list previously produced.

4. Identify all reports of alleged ice damage to vessels, or alleged incident involving ice contacting vessel (whether their was damage or not) during ice breaking operations at Summit North Marina from 2000 to present.

ANSWER: None, other than the allegations of Mr. Picchi in this case.

5. Identify all claims made against Summit North Marina, whether made to Summit North or to its insurer, for damage to vessels in the Marina, from 2000 to present.

ANSWER: Defendant is able to identify one claim for damage to the most of a sailboat. Specifics will be supplied.

6. Identify the name, identification number, make, model and manufacturer of the vessel used to break ice at Summit North Marina in February, 2003, and identify any alterations made to the vessel for ice breaking.

ANSWER: The vessel was constructed by the defendant. Therefore, it has no identification number, make or model. The boat was constructed from steel.

7. The name and address of the insurer of the Marina in February, 2003, and the policy number.

ANSWER: Liability insurance, North American Specialty Insurance Company, 650 Elm Street, Manchester, New Hampshire, 03101.

CASARINO, CHRISTMAN & SHALK

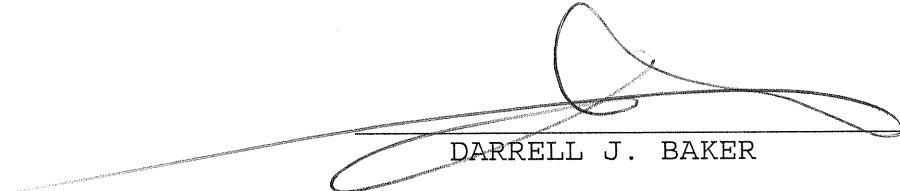
/s/ Stephen P.Casarino
STEPHEN P. CASARINO, ESQUIRE
I.D. No. 174
800 North King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
(302) 594-4500
Attorney for the Defendant

Dated:

AFFIDAVIT

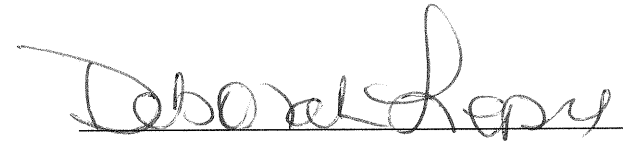
STATE OF DELAWARE :
: SS.
COUNTY OF New Castle :

I, DARRELL J. BAKER, being duly sworn do depose and say that I am the managing agent for Summit North Marina, Inc., and that Defendant's Answers to Plaintiff's Interrogatories are true and correct to the best of my information, knowledge and belief.


DARRELL J. BAKER

SWORN TO AND SUBSCRIBED before me, a Notary Public, this

14th day of June, 2007.


Notary Public

My Commission Expires: 11-18-2010

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NOTICE OF SERVICE

I, Stephen P. Casarino, hereby state that on this 14th day of June, 2007, I have had deposited in the mailbox at 800 King Street, Wilmington, Delaware, true and correct copies of Defendant Summit North Marina, Inc. Responses to Plaintiff's Interrogatories addressed to the person(s) listed below:

Patrick J. McStravick, Esquire
Hollstein, Keating, Cattell
Johnson & Goldstein, P.C.
1201 North Orange Street, Suite 730
Wilmington, DE 19801

CASARINO, CHRISTMAN & SHALK

/s/ Stephen P. Casarino Del. Bar #174
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Attorney for Defendant Summit North Marina