

**IN THE COURT OF COMMON PLEAS
MONTGOMERY COUNTY, OHIO**

JORDAN REYES, 1400 CLIFTON AVE. CINCINNATI, OHIO 45220 Plaintiff,	:	CASE NO. 2025 CV 01254
	:	JUDGE OLIVIA D. EDWARDS
	:	
v.	:	
DANTE MILES, 3214 BELMONT PARK DR. DAYTON, OHIO 45424 Defendant.	:	<u>PLAINTIFF'S FIRST SET OF REQUEST FOR PRODUCTIONS TO DEFENDANT</u>
	:	
	:	
	:	

NOW COMES Plaintiff, Jordan Reyes, by and through counsel, and pursuant to Rule 34 of the Ohio Rules of Civil Procedure, hereby requests that Defendant, Dante Miles, produce and permit Counsel for Plaintiff to inspect and copy the following materials. It is requested that said production be made within twenty-eight (28) days of receipt hereof by mailing a copy of all requested documents to undersigned counsel.

INSTRUCTIONS

1. These Requests are deemed continuing in nature so as to require Defendant's counsel to amend, supplement, or correct said production of documents should further information become known which would change or become relevant or material to this action.
2. Where knowledge or information in possession of a party is requested, such request includes knowledge of the party's agents, representatives, and unless privileged, his attorneys.

DEFINITIONS

1. “Accident” or “incident” refers to the occurrence on March 15, 2025 at the intersection of 5th and Jefferson in Nashville.
2. “Rideshare application” means any mobile or digital platform used by Defendant to accept, manage, or complete requests for passenger transportation, including but not limited to applications such as Zoomy, and includes all associated data, communications, and records generated or stored by such platform.

REQUEST FOR PRODUCTIONS

1. Any and all exhibits, documents, or demonstrative evidence which you intend to introduce at trial/arbitration of this matter, including but not limited to expert reports, photographs, diagrams or other materials.
2. All documents and electronically stored information, including but not limited to GPS data, geolocation coordinates, route history, data reflecting speed, braking and acceleration, and location tracking, reflecting the location and movement of Defendant’s vehicle for the 24-hour period preceding the incident through 2 hours after the incident.
3. All documents and electronically stored information, including trip logs, ride history, timestamps, and records of rides accepted, declined, canceled, or completed by Defendant, as well as data relating to the specific trip occurring at the time of the incident, including pick-up and drop-off locations and route taken for the 24-hour period preceding the incident.
4. All documents and electronically stored information reflecting Defendant’s use of the rideshare application at or near the time of the incident, including log-in and log-out

times, driver status, and any other interaction with the mobile device while operating the vehicle at the time of the incident.

5. All documents and electronically stored information, including communications, incident reports, or internal investigations generated by the rideshare application or sent to/from Defendant, relating to the incident or Defendant's operation of the vehicle at or near the time of the incident.

Dated: March 26, 2026

Respectfully submitted,

/s/ John C. Pryor

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Attorney for Jordan Reyes

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on March 26, 2026 a copy of the foregoing document was electronically filed with the Clerk of Court by using the ECF system which will send notice of electronic filing to the following:

David B. Shelby, Esq.
4942 Single Street
Cincinnati, Ohio 45202
Attorney for Defendant

/s/ John C. Pryor

John C. Pryor, Esq. (32154)