

**STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG
IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION**

SALLAMONDRA ROBINSON,)
INDIVIDUALLY AND AS)
PERSONAL REPRESENTATIVE OF)
THE ESTATE OF SHANQUELLA ROBINSON,)
DECEASED.)
)

Plaintiff,

v.)

E'MANI GREEN,)
ALYSSE HYATT,)
MALIK DYER,)
WENTER DONOVAN,)
KHALIL COOKE,)
NAZEER TYREE WIGGINS,)

Case No.: 24CV050336-590

Defendants.

MOTION TO COMPEL DISCOVERY RESPONSES

Plaintiff, pursuant to Rule 37 of the North Carolina Rules of Civil Procedure and N.C.G.S. 50-21(e), hereby moves this Honorable Court for an order compelling Defendant Green to respond to Plaintiff's First Set of Interrogatories and to Plaintiff's First Set of Requests for Production, and to pay Plaintiff's costs and attorney fees incurred in obtaining the order, and to impose other appropriate sanctions upon Defendant. In support of her motion, Plaintiff shows the Court as follows:

1. This lawsuit has always been about a mother seeking answers and accountability on behalf of her daughter.
2. This cause was remanded to this court on February 6, 2026.
3. Plaintiff served Plaintiff's First Set of Interrogatories and Plaintiff's First Set of Requests for Production on June 2, 2026. Defendant's responses were due no later than July 3, 2026. An extension was granted, extending the deadline for production to August 3, 2026.
4. A copy of Plaintiff's discovery requests are attached hereto as Exhibit A, and are incorporated herein by reference.

5. Defendant acknowledges that the discovery was pending and outstanding in Defendant's Petition for Writ of Cert.
6. Plaintiff's counsel advised Defense Counsel by email on July 31, 2026 that no discovery requested had been received and that the discovery responses are due and the parties agreed to meet and discuss outstanding responses.
7. At the time of the filing of this motion, Defendant Green has not responded to a single discovery request, and instead asks this Court to stay this matter to avoid responding altogether.
8. The parties through their attorneys Sue-Ann Robinson and Brian Manikowski conferred on the outstanding discovery and were unable to reach an agreement. Defense Counsel maintained that his client would not be responding to discovery.
9. Defendant Green's failure to respond to discovery has prejudiced the Plaintiff in that she has been denied the necessary information to allow Plaintiffs to prepare for the trial in this matter.
10. Plaintiffs put Defendant on notice they would be seeking court intervention and filing a Motion to Compel responses for failure to turn over discovery if no resolution was reached.
11. Plaintiffs have made a good faith effort to meet and confer to resolve these issues before filing this motion with the Court.
12. Defendant Green has provided no date to receive discovery responses.
13. Plaintiff continues to incur additional attorney fees due to Defendant Green's lack of response, and any other appropriate sanctions.

WHEREFORE, Plaintiff respectfully requests this Honorable Court to enter an order compelling Defendant to serve responses to all of the Plaintiff's First Set of Interrogatories and First Set of Requests for Production as no responses have been received and an order requiring the Defendant to pay Plaintiff's costs and attorney fees incurred in obtaining said order, and all such relief as the Court deems just and proper.

CERTIFICATION OF GOOD FAITH

I hereby certify that counsel for the movant has conferred with Defense Counsel for E'Mani Green in a good faith effort to resolve the issues but has been unable to resolve the issues.

This 5th day of August, 2026.

FRONTLINE LAW

/s/Sue-Ann Robinson

Sue-Ann Robinson, Esq. FBN: 29463

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FRONTLINE LAW

/s/Gabrielle Higgins

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WALLIS, BOWENS, AVERHART ASSOCIATES, PLLC

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CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing Motion upon all counsel of record via ECOURTS electronic filing system and mailing a copy thereof by first-class mail, postage prepaid, as follows:

Brian M. Williams
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Attorney for Khalil Cooke

Gary K. Sue
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Attorney for Wenter Donovan

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Attorneys for E'mani Green

Elliot A. Fus
OF COUNSEL: BLANCO, TACKABERY & MATAMOROS, P.A.
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Attorney for Defendant E'mani Green

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Attorney for Alysse Hyatt

James B. Stephenson,
II Stephenson Law, LLP
PO Box 1267 Cary, NC 27512
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Attorney for Nazeer Tyree Wiggins

I further certify that a copy was mailed or delivered to the following individual at the address listed below:

Malik Dyer
81 Burlington Street, Hartford,
CT 06112 Pro Se- Defendant

Service being in accordance with Rule 5, Chapter IA of the General Statutes of North Carolina.

This the 5th day of August, 2026

/S/ Saleisha N. Averhart

Saleisha N. Averhart, Esq.
Attorney for Plaintiff

Exhibit A

**STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG**

**IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24CV050336-590**

SALLAMONDRA ROBINSON,
INDIVIDUALLY AND AS
PERSONAL REPRESENTATIVE OF
THE ESTATE OF SHANQUELLA ROBINSON,
DECEASED.

Plaintiff,

v.

**NOTICE OF SERVING FIRST
SET OF INTERROGATORIES
PROPOUNDED UPON
DEFENDANT E'MANI
GREEN**

E'MANI GREEN,
ALYSSE HYATT,
MALIK DYER,
WENTER DONOVAN,
KHALIL COOKE,
NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT OF
STATE, AND THE
FEDERAL BUREAU OF INVESTIGATION,

Sallamondra Robinson, by and through Undersigned Counsel, propounds the attached request for responses to interrogatories to Defendant, E'Mani Green, to be answered under oath within thirty (30) days from the date of service in accordance with the applicable Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 03, 2026, a true and correct copy of the foregoing was furnished via electronic service to all counsel of record, with the Interrogatories sent under separate cover via email, to counsel for E'Mani Green:

Malik Dyer
81 Burlington Street
Hartford, CT 06112

Pro Se

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JT MLINARCIK
NC Bar No.: 35455
Attorneys for E'mani Green

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Attorney for Alysse Hyatt

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Attorney for Wenter Donovan

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Attorney for Khalil Cooke

Respectfully submitted,

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**STATE OF NORTH CAROLINA
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**IN THE GENERAL COURT OF JUSTICE
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SALLAMONDRA ROBINSON,
INDIVIDUALLY AND AS
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THE ESTATE OF SHANQUELLA ROBINSON,
DECEASED.

Plaintiff,

v.

**INTERROGATORIES
PROPOUNDED UPON
DEFENDANT E'MANI
GREEN**

E'MANI GREEN,
ALYSSE HYATT,
MALIK DYER,
WENTER DONOVAN,
KHALIL COOKE,
NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT OF
STATE, AND THE
FEDERAL BUREAU OF INVESTIGATION,

**PLAINTIFF'S FIRST SET OF INTERROGATORIES TO DEFENDANT E'MANI
GREEN**

By and through Undersigned Counsel, Plaintiff Sallamondra Robinson has propounded this first set of interrogatories unto Defendant E'mani Green, in accordance with Rules 26 and 33 of The North Carolina Rules of Civil Procedure . These interrogatories are to be answered in writing, under oath within 30 days in accordance with the North Carolina Rules of Civil Procedure.

You are required to answer these interrogatories fully and separately in writing and under oath in the space provided or by restating the interrogatory in writing and attaching said answers to a copy of these interrogatories if necessary to give a full and complete answer. If you object to

the interrogatory, you are required to state fully the objection and the grounds upon which it is based in lieu of the answer thereto where you would have otherwise stated the answer. Under Rule 33, answers given are to be signed by the individual making them; objections are to be signed by the attorney making them.

If any document referred to in an interrogatory or in an answer thereto is no longer in your possession or subject to your control, state the name of the person or entity in whose possession or control it is, their address and telephone number, or state what disposition was made of it and the date thereof.

Be advised that under Rule 37 of the North Carolina Rules of Civil Procedure, if you fail to respond to a request made herein under Rule 33 and 34, or if you give an evasive or incomplete response, Plaintiff may move for a court order compelling you to answer. If such motion is granted, the court granting the motion may require you to pay the reasonable costs incurred in obtaining the order, including attorney fees.

DEFINITIONS

1. The term “person” means and includes any natural person, individual, proprietorship, association, joint venture, firm, partnership, corporation, estate, trust, receiver, syndicate, municipal corporation, party and/or any other form of business enterprise, governmental body, group of natural persons or entity.
2. Date shall mean the exact date, month and year, if ascertainable or, if not, the best approximation of the date (based upon relationship with other events).
3. The term “incident” refers to the wrongful death of Shanquella Robinson that occurred on or around October 29, 2022 in Cabo San Lucas, Mexico.
4. The term “altercation” refers to Defendant Green’s violent attack of Shanquella Robinson, including but not limited to the part of the attack captured on video.
5. The term “trip” refers to the vacation to Cabo San Lucas, Mexico that began on or about October 28, 2022 and ended on or about October 30, 2022.
6. The term “Decedent” refers to the deceased Shanquella Robinson.
7. The phrase "describe and explain" and the term "state" as used herein are intended to and shall be interpreted to request a full and fair statement of the fact or matter being described and explained, including a statement of all facts, statements, events and circumstances necessary to understand and evaluate the fact or matter being described and explained.
8. The term “identify” when used in reference to a person means that you shall state the person’s full name, any known nickname or alias(es), present or last known address(es)

and telephone number(s), present or last known employment or business affiliation (including the address and telephone number), and the person's employment at the time in question. For persons whose addresses are known to be inaccurate, please state the most reliable contact address or contact person according to your records, knowledge or information.

9. The term "identify" when used in reference to a document means that you shall state its title or heading, nature or type (e.g., letter, telegram, memoranda, chart, report, study, etc.), date, subject matter, author, signatory, addressee and/or recipient, present or last known location and/or custodian and whether you are in possession or control of the document.
10. The term "identify" when used in reference to a communication means you shall state its nature and type (e.g., telephone, personal or other conversation, correspondence, telegram, etc.), a description of the subject matter of the communication, the date and place where such communication occurred, the identity of each person who participated in, was present during, or otherwise witnessed any part of such communication and the identity of each document in which such communication was recorded, described or referenced.
11. The term "identify" when used in reference to an act, action or event mean its nature and the sequence of steps in its occurrence, the date and time it occurred, where it occurred, the persons who were involved, who or what caused the act, action or event to occur and the purposes or reasons for its occurrence.
12. The term "identify" when used in any context other than as defined above shall mean a description of the subject to be identified and specification of the documents or communications in which the subject is or was recorded, described or referred, and all other information necessary to fully identify the subject.
13. Each Interrogatory and Request for Production should be construed to include all knowledge in your possession, custody, or control, including that of your agents, employees, representatives, or anyone acting on your behalf.

INTERROGATORIES

1. What is the full legal name, current address, date of birth of the person answering these interrogatories, and your relationship to the Decedent?

ANSWER:

2. List all former names and when you were known by those names. State all addresses where you have lived for the past 10 years and the dates you lived at each address.

ANSWER:

3. List the name and addresses of all persons who are believed or known by you, your agents, or your attorneys to have any knowledge concerning any of the issues in this lawsuit; and specify the subject matter about which the witness has knowledge. This includes the names of any third parties who were interviewed and/or contacted in connection with this incident.

ANSWER:

4. State the name(s) and address(es) of the person(s) known to the parties or counsel who can substantiate and/or support each and every defense raised in response to the Amended Complaint.

ANSWER:

5. Detail all statements and/or actions you contend constituted “belligerent behavior” and “provocation” as identified in E’Mani Green’s Amended Answer to the Verified Complaint.

ANSWER:

6. State your role in organizing, planning, coordinating, or funding the trip to Cabo San Lucas, Mexico in October 2022, including whether you were responsible for booking lodging, transportation, activities, or excursions. If you had no role in the coordination of any aspect of the trip to Cabo San Lucas, Mexico in October 2022, indicate the name and addresses of all persons who are believed or known by you to have held such responsibility and the role they played in the coordination of the trip.

ANSWER:

7. Describe in detail your knowledge of the events leading up to and including the death of Shanquella Robinson in Cabo San Lucas, Mexico in October 2022, including any knowledge about the medical treatment requested for and provided to the decedent Shanquella Robinson.

ANSWER:

8. Identify all persons present at or near the scene of the subject incident and describe their involvement, if any.

ANSWER:

9. Describe in detail your knowledge of the events immediately following the death of Shanquella Robinson in Cabo San Lucas, Mexico in October 2022, including your travel back to the United States, and all subsequent investigations into the death of Shanquella Robinson.

ANSWER:

10. State whether you consumed or were under the influence of alcohol, narcotics, prescription medication or any other controlled substances at any time during the trip in Cabo San Lucas, Mexico in October 2022, and if so, specify the dates and substances used.

ANSWER:

11. Describe in detail how you received, viewed, and/or obtained knowledge of the recording of the physical altercation involving Shanquella Robinson and any other individuals at Puerto Los Cabos Villas Linda or any other location in Mexico on or before October 29, 2022.

ANSWER:

12. State whether you or any other individuals requested medical treatment for Shanquella Robinson. Specifically, state whether or not you authorized or incurred the cost for such medical services. If so, describe in detail what you saw, heard, or did upon the arrival of medical treatment providers.

ANSWER:

13. Identify any written or oral statements you provided to any person, entity, law enforcement agency, medical care provider, doctor or insurance provider regarding the incident, including the date of the statement.

ANSWER:

14. Describe any communication you had with the decedent, Shanquella Robinson, on October 29, 2022, including the time, nature, and content of such communication.

ANSWER:

15. Describe any communication with any of the other travel companions who attended the trip to Cabo San Lucas, Mexico in October 2022, related to any of the issues raised in this lawsuit. State the nature of the communication, date, and any participants in the communication.

ANSWER:

16. Identify any medical conditions, including mental health issues or physical limitations, you believe impacted the Decedent Shanquella Robinson's behavior before or during the trip. Indicate how you were made aware of these conditions.

ANSWER:

17. Identify the date, jurisdiction, charge, and disposition of all arrests or criminal charges brought against you within the last 10 years.

ANSWER:

18. Identify all of your cellphone provider(s) at the time of the subject incident and the telephone number associated with your account.

ANSWER:

19. List all social media accounts, including Facebook, Twitter/X, Snapchat, Instagram, TikTok, LinkedIn and any other related accounts owned and/or accessed by you, including all aliases, pseudonyms, secondary accounts, “finsta” accounts, burner accounts, or anonymous profiles maintained by you from January 2022- present.

ANSWER:

20. State whether any photos, videos, messages, or interactions related to the subject incident have been deleted, destroyed, altered, hidden, archived, or otherwise rendered inaccessible from your mobile device(s) and/or social media accounts.

ANSWER:

21. Detail all actions taken to remove, collect, transport, discard, alter, relocate, or otherwise handle any item, object, document, substance, or other form of evidence, previously owned or in the possession of the Decedent Shanquella Robinson, from the Puerto Los Cabos Villas Linda, on or around October 29, 2022.

ANSWER:

22. Describe in detail every act of physical contact, force, restraint, strike, or battery that you had with the Decedent, Shanquella Robinson, during the subject incident, including timing, location, mode of contact, and your purpose for each act.

ANSWER:

VERIFICATION

I have read the foregoing Answers to First Set of Interrogatories and do swear that they are true and correct to the best of my knowledge and belief.

_____, Defendant

STATE OF NORTH CAROLINA
COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared

_____,
who is personally known to me or who has produced _____ as
identification, and who, after first being duly sworn, depose and say that they have read the
foregoing Answers to First Set of Interrogatories which were propounded to E'Mani Green by
the Plaintiff and to the best of her knowledge and belief are true and correct.

SWORN TO AND SUBSCRIBED before me, this _____ day of _____
2026.

NOTARY PUBLIC

Print Name: _____

My Commission Expires: _____

**STATE OF NORTH CAROLINA
COUNTY OF MECKLENBURG**

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SALLAMONDRA ROBINSON,
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DECEASED.

Plaintiff,

v.

**NOTICE OF SERVING FIRST
SET OF REQUESTS FOR
PRODUCTION
PROPOUNDED UPON
DEFENDANT E'MANI
GREEN**

E'MANI GREEN,
ALYSSE HYATT,
MALIK DYER,
WENTER DONOVAN,
KHALIL COOKE,
NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT OF
STATE, AND THE
FEDERAL BUREAU OF INVESTIGATION,

Sallamondra Robinson, by and through Undersigned Counsel, propounds the attached request for production to Defendant, E'Mani Green, to be answered under oath within thirty (30) days from the date of service in accordance with the applicable Rules of Civil Procedure.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on June 03, 2026, a true and correct copy of the foregoing was furnished via electronic mail and service to all counsel of record, with the Requests for Production sent under separate cover via email, **to** counsel for E'Mani Green:

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Attorneys for E'mani Green

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Pro Se

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Attorney for Wenter Donovan

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Attorney for Khalil Cooke

Nazeer Tyree Wiggins
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Pro Se

Respectfully submitted,

/s/ Sue-Ann Robinson
Sue-Ann Robinson, Esq.
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Pro hac vice

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614 S. Federal Highway
Fort Lauderdale, FL 33301
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WALLIS, BOWENS, AVERHART & ASSOCIATES, PLLC

/s/ Saleisha Nadia Averhart
Saleisha Nadia Averhart, Esq. (NC State Bar No. 40178)
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Raleigh, North Carolina 27612
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Plaintiff,

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**REQUESTS FOR
PRODUCTION
PROPOUNDED UPON
DEFENDANT E'MANI
GREEN**

E'MANI GREEN,
ALYSSE HYATT,
MALIK DYER,
WENTER DONOVAN,
KHALIL COOKE,
NAZEER TYREE WIGGINS,
UNITED STATES DEPARTMENT OF
STATE, AND THE
FEDERAL BUREAU OF INVESTIGATION,

**PLAINTIFF'S FIRST SET OF REQUESTS FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT E'MANI GREEN**

By and through Undersigned Counsel, Plaintiff Sallamondra Robinson has propounded this first set of requests for production of documents unto Defendant E'mani Green, in accordance with Rules 26 and 34 of The North Carolina Rules of Civil Procedure. These interrogatories are to be answered in writing, under oath within 30 days in accordance with the North Carolina Rules of Civil Procedure.

Pursuant to Rule 34 of the North Carolina Rules of Civil Procedure, Plaintiff does hereby request that the named Defendant produce the originals of all documents requested herein and permits Plaintiff and/or counsel to inspect and copy the same at the office <insert here> or to provide for the exchange of the requested documentation on or before <insert date>.

If any document referred to in an interrogatory or in an answer thereto is no longer in your possession or subject to your control, state the name of the person or entity in whose possession or control it is, their address and telephone number, or state what disposition was made of it and the date thereof.

Be advised that under Rule 37 of the North Carolina Rules of Civil Procedure, if you fail to respond to a request made herein under Rule 33 and 34, or if you give an evasive or incomplete response, Plaintiff, may move for a court order compelling you to answer. If such motion is granted, the court granting the motion may require you to pay the reasonable costs incurred in obtaining the order, including attorney fees.

DEFINITIONS

1. The term “person” means and includes any natural person, individual, proprietorship, association, joint venture, firm, partnership, corporation, estate, trust, receiver, syndicate, municipal corporation, party and/or any other form of business enterprise, governmental body, group of natural persons or entity.
2. Date shall mean the exact date, month and year, if ascertainable or, if not, the best approximation of the date (based upon relationship with other events).
3. The term “produce” means to furnish, provide, make available for inspection and copying, or otherwise deliver documents, including electronically stored information, tangible items, or other materials responsive to the requests for production. Electronically stored information shall be produced in its native format, with all associated metadata.
4. The term “incident” refers to the wrongful death of Shanquella Robinson that occurred on or around October 29, 2022 in Cabo San Lucas, Mexico.
5. The term “altercation” refers to Defendant Green’s violent attack of Shanquella Robinson, including but not limited to the part of the attack captured on video.
6. The term “trip” refers to the vacation to Cabo San Lucas, Mexico that began on or about October 28, 2022 and ended on or about October 30, 2022.
7. The term “Decedent” refers to the deceased Shanquella Robinson.
8. The phrase "describe and explain" and the term "state" as used herein are intended to and shall be interpreted to request a full and fair statement of the fact or matter being

described and explained, including a statement of all facts, statements, events and circumstances necessary to understand and evaluate the fact or matter being described and explained.

9. The term “identify” when used in reference to a person means that you shall state the person’s full name, any known nickname or alias(es), present or last known address(es) and telephone number(s), present or last known employment or business affiliation (including the address and telephone number), and the person’s employment at the time in question. For persons whose addresses are known to be inaccurate, please state the most reliable contact address or contact person according to your records, knowledge or information.
10. The term “identify” when used in reference to a document means that you shall state its title or heading, nature or type (e.g., letter, telegram, memoranda, chart, report, study, etc.), date, subject matter, author, signatory, addressee and/or recipient, present or last known location and/or custodian and whether you are in possession or control of the document.
11. The term “identify” when used in reference to a communication means you shall state its nature and type (e.g., telephone, personal or other conversation, correspondence, telegram, etc.), a description of the subject matter of the communication, the date and place where such communication occurred, the identity of each person who participated in, was present during, or otherwise witnessed any part of such communication and the identity of each document in which such communication was recorded, described or referenced.
12. The term “identify” when used in reference to an act, action or event mean its nature and the sequence of steps in its occurrence, the date and time it occurred, where it occurred, the persons who were involved, who or what caused the act, action or event to occur and the purposes or reasons for its occurrence.
13. The term “identify” when used in any context other than as defined above shall mean a description of the subject to be identified and specification of the documents or communications in which the subject is or was recorded, described or referred, and all other information necessary to fully identify the subject.
14. Each Interrogatory and Request for Production should be construed to include all knowledge in your possession, custody, or control, including that of your agents, employees, representatives, or anyone acting on your behalf.

REQUESTS FOR PRODUCTION

1. Produce all photographs, videos, or recordings captured or received while you or any of your travel companions were in Cabo San Lucas, Mexico in October 2022, including the date and content of each record.

ANSWER:

2. Produce all social media content that has been deleted, archived, hidden, modified, edited or removed from any of your social media platforms relating to the subject matter of this lawsuit including metadata sufficient to identify the date of creation, modification, and deletion.

ANSWER:

3. Produce all social media content created, posted, shared, uploaded, transmitted, received, or edited by you from October 1, 2022 to present, including but not limited to posts, comments, reels, photographs, videos, stories, direct messages, status updates, profile changes, or other account activity to the extent such content references, depicts, concerns, or arises from the subject incident, involves the Decedent Shanquella Robinson, your travel companions, any defendants in this action, your physical condition and/or any alleged injuries sustained by you.

ANSWER:

4. Produce all hotel, resort, and/or lodging accommodation records related to your stay in Mexico in October 2022, including reservations, check-in/check-out records, invoices, room charges, credit card statements, and guest registration documents.

ANSWER:

5. Produce all records related to your travel companions on the subject vacation including reservation, shared itineraries or communications related to your stay and departure from Mexico in October 2022.

ANSWER:

6. Produce all medical records from all treatment providers, including hospital records, emergency medical records, physician records, and/or urgent care records, that reflect injuries sustained by E'Mani Green during the subject incident, or believed to support the claim of self-defense.

VERIFICATION

I have read the foregoing Answers to First Set of Interrogatories and do swear that they are true and correct to the best of my knowledge and belief.

_____, Defendant

STATE OF NORTH CAROLINA

COUNTY OF _____

BEFORE ME, the undersigned authority, personally appeared

_____,
who is personally known to me or who has produced _____ as
identification, and who, after first being duly sworn, depose and say that they have read the
foregoing Answers to First Set of Interrogatories which were propounded to E'Mani Green by
the Plaintiff and to the best of her knowledge and belief are true and correct.

SWORN TO AND SUBSCRIBED before me, this _____ day of _____
2026.

NOTARY PUBLIC

Print Name: _____

My Commission Expires: _____