

**United States District Court
District of South Dakota
Southern Division**

Christopher Roller

(Plaintiff)

vs.

GE Medical Systems Information

Technologies, Inc.

(Defendant)

Civil Action No. 06-CV-4098

**Statement Refuting Defense's
Undisputed Material Facts**

Statement Refuting Defense's Undisputed Material Facts

Pursuant to Local Rules 56.1(c) of Local Rules of Practice of United States District Court District of South Dakota Southern Division, plaintiff submits a statement refuting defense's Undisputed Material Facts. If I don't mention a disputed statement, then I don't dispute it.

24., 26. Incorrect - I talked with Noah Allard and Troy Wollman about my bipolar and meds, and perhaps Nate Kruse briefly RollerAff. ([Roller Aff. ¶5](#))

30. This also coincided with the poisoning and resulting heavy dose of Zyprexa I was on. ([Roller Aff. ¶11](#)) Still received a performance code of 2. ([Roller Aff. ¶45](#))

31., 32., 34. No one reported any performance problems to me until the meeting stated in 25 ([Roller Aff. ¶14](#)).

33., 35. 2nd evaluation was written after I was dismissed, and can be skewed to suit the defense needs, and should be ignored ([Roller Aff. ¶46](#)).

36. Agreed, but I told Bob Moore middle/end of Jan. the reason for the lacking performance was the daily 20 mg of Zyprexa (drugs) I was on. ([Roller Aff.](#) ¶14)

37. Disagreed, there was no counseling for my joking behavior. ([Roller Aff.](#) ¶38, 45, 51) It was 15 months (before dismissal) since my last joking antic, after the fake poop gag backfired. ([Roller Aff.](#) ¶82)

39. I was eating a cucumber for lunch and it was in between (held) my legs while I typed. It looked bad, so I joked about it because she and Russ Knoepfel were reading x-rated jokes off the internet and that was the atmosphere. ([RollerDep](#) pg 74)

40. Asked her bowling one time so I could tell her www.mytrumanshow.com - not several times. She complained, and I didn't ask her out again. I only need one warning. ([RollerDep](#) pg 74-76)

45. There was a half opened bag of potato chips on the table too :)

47. Occurred before 9Nov2000. ([Roller Aff.](#) ¶38)

48. Reprimanded with a dirty look only ([RollerDep](#) pg 57). That's when I stopped joking around. ([Roller Aff.](#) ¶56)

52., 53.. We all joked around, although this one did back-fire horribly, I admit. Bob Moore told me he was getting emails from the other Bob Moore. He also kidded about kiddie porn on a number of joking occasions. I did the joke, but I got my material from Bob Moore. ([MooreDep](#) pg 11)

54. The joke was intended to be funny. I experiment with humor and this one back-fired. ([RollerDep](#) pg 97)

55. Incorrect. Reprimanded with a glaring look over my cubicle. Signed no document. ([RollerDep](#) pg 57)

56. I was not informed about feedback from any argument except from Kevin Impecoven - that's when I was dismissed. ([Roller Aff.](#) ¶15, 48-50)

57, 58. It was not intense, just a 3 second argument to leave me alone and do his own job. It was the day I was let out of the cage following my poisoning and I was in a bad mood for nobody taking me serious. I was not removed, but asked to go home for the day. ([Roller Aff.](#) ¶42)

59, 60. Have absolutely no recollection of this, and I usually remember anything worth remembering, especially if it was heated. Probably didn't happen as Moore states. Moore won't even admit visiting me at Sioux Valley Hospital after the poisoning ([Roller Aff.](#) ¶9), so I wouldn't put much worth to his testimony. If Moore was concerned for his safety, he should've had me sign something indicating so, but there is no such document.

61. Not so heated. No big deal according to Noah Allard. ([Roller Aff.](#) ¶83) A one second argument disagreeing with him during a meeting. Nobody told me of any safety concerns ([Roller Aff.](#) ¶17). It was on 11 Feb 2002 (exactly), 7 days before the dismissal. ([Roller Aff.](#) ¶15)

62. This is recent news not reported until recent documents. ([RollerDep](#) pg. 132) Didn't "run him down". Simple merging of my car into 57th street traffic. Wasn't

shortly after - it was a week later. ([Roller Aff. ¶15](#))

64. It was a hunch because nothing else made sense at the time. ([Roller Aff. ¶84](#))

65. The only time I was told of performance problems was mid/late January, when I told Bob Moore the drugs were affecting me. ([Roller Aff. ¶14](#)) Placed on leave because of the argument with Kevin Impehoven and nothing else. The traffic merging was a recent development the defense finally fessed up to in ([RollerDep pg. 132](#)).

75. Give me \$1 billion and I'll return the compensation.

77., 78. Nobody fits my profile - no one else was a mentally ill bi-polar Jesus guy. Comparison is unfair. ([Roller Aff. ¶57](#))

83. Not just mental illness via bi-polar, but also Jesus-guy syndrome. ([Roller Aff. ¶57](#))

88. 20 mg. of daily Zyprexa limited my performance and punctuality at work progress at GE, and they knew I was on these powerful drugs. ([Roller Aff. ¶19](#))

96. My mental condition is not just bi-polar, but Jesus-false-prophet syndrome. ([Roller Aff. ¶57](#)) The combination severely hinders my ability to find a job and keep it. ([Roller Aff. ¶86](#))

Respectfully submitted,

Date: __10 Nov 2006__

____s/_Christopher A. Roller_____

Christopher Roller (pro se)

13150 Harriet Ave. S #273

Burnsville, MN 55337

952.239.6410