

1 IN THE SUPERIOR COURT OF [REDACTED]

2 IN AND FOR [REDACTED]

3
4 CHRISTIAN DOSCHER,
5 Plaintiff

6 vs.

7
8 JAMES PATRICK HOLDING,
9 JOHN DOE # 1,
10 Defendants

CASE NO. 15-2-01352-9

PLAINTIFF'S FIRST SET OF
INTERROGATORIES
AND
REQUESTS FOR PRODUCTION
TO DEFENDANT
JAMES PATRICK HOLDING

11 Send your completed answers and responses to:

12 Christian Doscher
13 [REDACTED]

14
15 25"Settle matters quickly with your adversary who is taking you to court. Do it while you are still with him
16 on the way, or he may hand you over to the judge, and the judge may hand you over to the officer, and you
17 may be thrown into prison. 26I tell you the truth, you will not get out until you have paid the last penny."

18 5:25-26 Jesus' second illustration of the urgency of reconciliation pictures an out-of-court settlement between
19 fellow litigants. These verses offer good advice at the literal level of legal proceedings ..., the details of vv. 25-
20 26 must not be allegorized.

21 40And if someone wants to sue you and take your tunic, let him have your cloak as well. 41If someone
22 forces you to go one mile, go with him two miles. 42Give to the one who asks you, and do not turn away
23 from the one who wants to borrow from you.

24 "Each of these commands requires Jesus' followers to act more generously than what the letter of the law
25 demandd."

Blomberg, C. (2001, c1992). Vol. 22: Matthew (electronic ed.). Logos Library System;
The New American Commentary (Page 108). Nashville: Broadman & Holman Publishers.

(the background here seems to be non-Jewish since the Jews did not imprison for debt)... It is a mistake to
allegorize the details and to identify the adversary or the judge with God.

Hagner, D. A. (2002). Vol. 33A: Word Biblical Commentary : Matthew 1-13.
Word Biblical Commentary (Page 117). Dallas: Word, Incorporated.

Doscher sure wanted me to move fast. "Settle matters quickly"....right, because he'll be declaring bankruptcy in about a month. No professional attorney would have sent out interrogatories before jurisdiction was settled, because it would be a huge waste of time and money to do so if they ended up losing in jurisdiction. It's only because Doscher is unemployed with too much time on his hands that he was able to crank them out so fast at no risk -- and there's a huge hole in the law that allows that to happen.

1 If Plaintiff feels that your answers and responses herein which refer to emailed or internet-based
2 communications with third-parties are not truthful, he will subpoena the relevant ISPs and will
3 compare their records with your discovery answers. If there is any discrepancy between the two,
4 Plaintiff will move for sanctions against you. Thou shalt not bear false witness.

Thou shalt not be able to subpoena anything
because thou art indigent.

5 **INTERROGATORY NO. 1:** State your current full legal name, any other legal name you
6 have ever used since birth, your social security number, your date of birth, current telephone
7 number and all addresses within the last 5 years which you used as residences and for receiving
8 mail. Specify which particular addresses of yours you wish Plaintiff to use to communicate with
9 you before this case goes to trial.

ANSWER:

10 **REQUEST FOR PRODUCTION NO. 1:** Provide a true and correct copy of any and all
11 documents which you currently have access to, or which you are capable of obtaining, which
12 support your answer to the preceding Interrogatory.

RESPONSE:

Doscher cranked out this "request for production" after each
interrogatory. Most of the time it was just "make work" that I didn't
actually have to do, as my attorney later explained.

16 **INTERROGATORY NO. 2:** State the full email address for any and all email accounts you
17 have logged into at any time since January 1, 2015. For any email accounts you ceased using
18 since that date, specify which, and on which date you ceased using them.

ANSWER:

21 **REQUEST FOR PRODUCTION NO. 2:** Provide a true and correct copy of any and all
22 documents which you currently have access to, or which you are capable of obtaining, which
23 support your answer to the preceding Interrogatory.

RESPONSE:

1 **INTERROGATORY NO. 3:** For each month between August 1, 2013 and August 1, 2015,
2 state the total monthly tax-exempt income of your entire combined marital estate. You should
3 provide sixty separate dollar amounts, specifying which amounts, from which sources, and on
4 which months they were received.

5 **ANSWER:**

Sixty separate dollar amounts? Really? That's incredibly nosy, and he
didn't need it; plus we just don't keep those kinds of records. Once we
pay a bill, we shred it. We sent him just a rough summary of yearly
expenses.

13
14
15
16
17
18
19
20
21
22 **REQUEST FOR PRODUCTION NO. 3:** Provide annual tax returns or other official
23 accounting forms to support your answer to the preceding Interrogatory.

24 **RESPONSE:**

1 **INTERROGATORY NO. 4:** For each month between August 1, 2013 and August 1, 2015,
2 state the total monthly taxable income of your entire combined marital estate. You should
3 provide sixty separate dollar amounts.

4 **ANSWER:**

5  

6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22 **REQUEST FOR PRODUCTION NO. 4:** Provide annual tax returns, or other similar official
23 accounting forms to support your answer to the preceding Interrogatory.

24 **RESPONSE:**



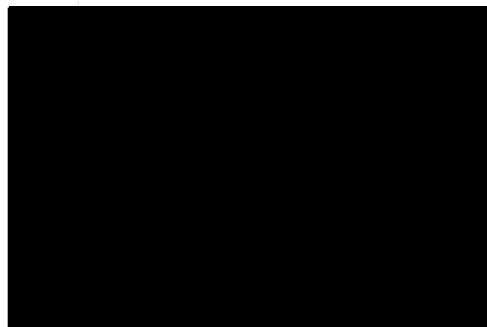
INTERROGATORY NO. 5: Describe with specificity any and all actions that you and your spouse took, together and separately, between September 1, 2013 and September 1, 2015 to obtain any type of financial income or funding. This includes, but is not limited to: stealing, extortion, asking for donations to your ministry, reception of money-gifts from any person or source, selling or pawning personal possessions, operating any home-based or other businesses, book sales, church work, apologetics work, freelance writing, contract work, seeking employment, obtaining employment, mortgages, loans, paying into pension plans or 401k's, purchasing or selling stocks/property, etc.

ANSWER:

[Handwritten signature/initials]

REQUEST FOR PRODUCTION NO. 5: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:



1 **INTERROGATORY NO. 6:** Do you or your spouse own any houses or real estate of any
2 kind? If your answer is "yes", provide the full legal address of each such property or real estate,
3 and, if you already own the title free and clear, the total amount you paid for it along with date of
4 last payment. For property you are still making payments on, provide the average monthly
5 payment amount that you've been making for the last 3 months.

6 **ANSWER:**

7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
Bad news for Doscher, in Florida, a home is
exempted from this type of thing. I found him
complaining about it later somewhere else.

26 **REQUEST FOR PRODUCTION NO. 6:** Provide a true and correct copy of any and all
27 documents which you currently have access to, or which you are capable of obtaining, which
28 support your answer to the preceding Interrogatory.

29 **RESPONSE:**

30 **INTERROGATORY NO. 7:** Do you or your spouse own any motor-vehicles, including but
31 not limited to cars, trucks, boats, motorcycles? If your answer is "yes", state the make, model
32 and year of each such vehicle, the amount you paid for it and date of last payment.

33 **ANSWER:**

34 **REQUEST FOR PRODUCTION NO. 7:** Provide a true and correct copy of any and all
35 documents which you currently have access to, or which you are capable of obtaining, which
36 support your answer to the preceding Interrogatory.

37 **RESPONSE:**

INTERROGATORY NO. 8: State with specificity all monthly recurring debts, bills and expenditures which you and your combined marital household have incurred since August 1, 2013, including but not limited to payments you've made for rents, mortgages, food, electricity, water/sewer/garbage, credit cards, storage spaces, vehicles, auto insurance, house insurance, life insurance, other types of insurance, membership fees, court judgments, entertainment, subscriptions, tithing. Provide the name of the bill or debt, and the average monthly amount you've paid on it since August 5, 2013. Also specify separately the current consumer credit scores for both yourself and your spouse.

ANSWER:

The pretense for all of this was assessing for punitive damages. Doscher was asking for punitive damages under Florida law. He actually violated Florida law with that because Florida law requires a hearing before punitive damages can be requested and financial discovery can be requested. Unfortunately, my attorney did not know Florida law and I did not find out until too late.

REQUEST FOR PRODUCTION NO. 8: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:

INTERROGATORY NO. 9: Specify whether or not you intend to ask Plaintiff to accept monthly payments from you, should the court or jury in this case award an amount of damages against you which you cannot fully pay off in a single lump sum.

ANSWER:

REQUEST FOR PRODUCTION NO. 9: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:

1 **INTERROGATORY NO. 10:** Provide the name and address of any and all banks at which
2 you and your spouse currently hold any type of checking, savings, retirement, business or other
3 financial account, along with all amounts of money that were in each on July 10, 2015 and
4 August 10, 2015. In Post # 62 of your theologyweb thread "A Major (Personal) Change", you
5 say "We have a decent nest egg (which we'd rather spend on retirement)". State the nature of
6 said 'nest egg' (cash under the bed, cash in a bank account, gold, silver, rare coins, etc) and the
7 total amount it was worth on June 30, 2015 (the day you posted that information), and the total
8 amount it was worth on August 10, 2015, and the name of the person, entity, business or
9 financial institution holding said 'nest egg' for you.

10 **ANSWER:**

tn 20

11
12 **REQUEST FOR PRODUCTION NO. 10:** Provide a true and correct copy of any and all
13 documents which you currently have access to, or which you are capable of obtaining, which
14 support your answer to the preceding Interrogatory.

15 **RESPONSE:**

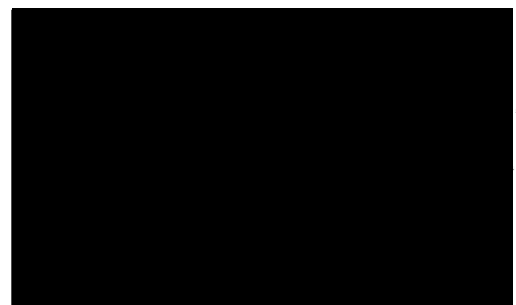
16 **INTERROGATORY NO. 11:** State the name of all cities where you currently have cash or
17 assets stored, and state the amount or monetary value of each.

18 **ANSWER:**

tn 20

19
20
21
22 **REQUEST FOR PRODUCTION NO. 11:** Provide a true and correct copy of any and all
23 documents which you currently have access to, or which you are capable of obtaining, which
24 support your answer to the preceding Interrogatory.

25 **RESPONSE:**



1 **INTERROGATORY NO. 12:** Describe with specificity the amount and source of any other
2 cash or funding you have not disclosed in answer to the prior interrogatories.

3 **ANSWER:**
4
5
6
7

8 **REQUEST FOR PRODUCTION NO. 12:** Provide a true and correct copy of any and all
9 documents which you currently have access to, or which you are capable of obtaining, which
10 support your answer to the preceding Interrogatory.

11 **RESPONSE:**
12
13

14 **INTERROGATORY NO. 13:** Describe with specificity any and all actions you and your
15 wife took, whether together or separately, between May 1, 2015 August 30, 2015 and thereafter
16 to protect bank accounts from levy, protect wages from garnishment, or to transfer real property
17 out of the owner's name by gift or sale, where the fair market value of said property was \$500
18 (five hundred dollars) or greater.

19 **ANSWER:**
20
21
22
23
24
25

20 **REQUEST FOR PRODUCTION NO. 13:** Provide a true and correct copy of any and all
21 documents which you currently have access to, or which you are capable of obtaining, which
22 support your answer to the preceding Interrogatory.

23 **RESPONSE:**
24
25

INTERROGATORY NO. 14: Provide the name and address of the current employers of your spouse and yourself, with whom you held the status of "employed" at any time in August 2010 on the day you mailed these discovery answers and responses back to Plaintiff, and length of all such employment.

ANSWER:

will 12715

REQUEST FOR PRODUCTION NO. 14: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:

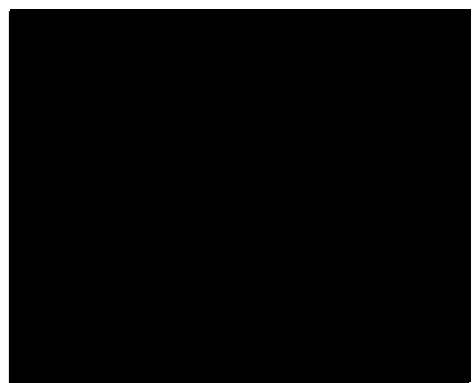
INTERROGATORY NO. 15: State all marital statuses that were ever true about you between 1985 and 2015 (i.e., single, married, divorced, separated, widowed, annulled, partnership, common-law, etc). If divorce or annulment occurred, state the name of the person or persons who had been or had attempted to become your spouse, along with dates when such status was officially recognized or officially denied by a court of law.

ANSWER:

OK

REQUEST FOR PRODUCTION NO. 15: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:



19X

INTERROGATORY NO. 16: Using the entirety of the "The 'Secret Identity' of Skepticbud aka spirit5er aka Debunked aka B&H aka" thread at theologyweb.com (i.e., 'skepticbud thread') as a chronology of events, identify any communications and meetings you participated in with other theologyweb.com members, where facts about Plaintiff, opinions about Plaintiff, or both, were communicated by anybody to anybody. Specify the means of communication used for each such communication or meeting (face to face, phone, email, theologyweb private message, U.S. Postal mail, etc), the real life names of each such potential witness who participated therein, the date all such participations took place, and the theologyweb.com pseudonyms or nicknames, if any, for each such participant, including, but not limited to, "sparko", "Raphael", "Christianbookworm", "One Bad Pig", "Cow Poke", "Cerebrum123", "Bill the Cat", "RumTumTugger", "Apologiaphoenix", "Paris Washington", "JimboJSR", "rogue06", "Jedidiah", "Darth Executor", "mossrose", "Chrawnus", "Kingsgambit" and "I am Ivo, hear me roar". Since you admit that theologyweb software tracks the IP address of all posting members, provide ALL IP addresses for each tweb member's initial sign up for membership at tweb, as well as the all IP addresses of the posts they made to theologyweb between May 1, 2015 and August 30, 2015.

WD - 1600+

ANSWER:

As noted, Doscher assumed I knew this information about all these people. I didn't. I knew addresses for maybe two of them. He threatened three of them (Sparko, Christianbookworm, and ApologiaPhoenix) with lawsuits but never delivered. Notice he also assumes I'm in some sort of regular communication with all of them. He was sorely disappointed.

REQUEST FOR PRODUCTION NO. 16: Provide a true and correct copy of any and all documents which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:

INTERROGATORY NO. 17: In Post # 15 of the "skepticbud thread", the person posting under the pseudonym "Cow Poke" said:

Don't worry, Bro - we're comparing notes behind the scenes.

In Post # 16 of said thread, you say:

Don't be to sure...I already have a line on that blog you "recently noticed"

Provide a full unabridged unedited true and correct copy of every post within said "blog". State all facts and opinions about Plaintiff that you asserted "behind the scenes" to "Cow Poke", all facts and opinions about Plaintiff which "Cow Poke" asserted "behind the scenes" to you, all sources for the information that you exchanged with each other thereto, all dates on which said note-comparing occurred, the medium of communication for each note-comparison session (phone, email, private theologyweb message, internet, other). Since Plaintiff will need to obtain Cow Poke's testimony on this matter, provide the full real-life name, current residence address, current email address, website address, if any, and current telephone number of the person using the theologyweb pseudonym "Cow Poke".

ANSWER:

This one was hilarious for a couple of reasons. One is that he had already asked for that info on "Cow Poke" just one question earlier. The other is that he didn't get that my comment was a joke about John Loftus. There was no "blog" -- this was an allusion to Loftus' fake blog about me some years back, which was actually his but which he claimed to have "recently noticed." It's also funny because to get Cow Poke's testimony, he'd have had to pay for him to be subpoenaed and deposed -- or sue him. And Doscher had even less evidence of "express aiming" and contacts with his home state for those people than he did me. He thinks he has enough money to serve 19 different people within the 2 year statute of limitations for libel in most states (never mind that he didn't even consider that some may have lived overseas)? He couldn't even afford to subpoena my cell phone records. As a final blow, any lawsuits against these people would have been the property of the government since he didn't declare the potential lawsuits on his bankruptcy paperwork.