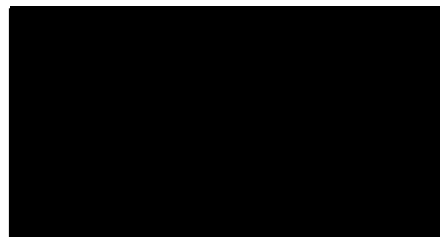


1 **REQUEST FOR PRODUCTION NO. 17:** Provide documentation of the full unabridged
2 emails, private theologyweb messages and/or other communications documenting all the
3 information requested in the preceding Interrogatory. For all such requested evidence which you
4 claim you no longer have the information or otherwise cannot obtain, specify:

- 5 a) All efforts you made to obtain it;
6 b) The dates those efforts occurred;
7 c) The internet pseudonyms and real life names, current email residence addresses, current
8 phone numbers of all person(s) you contacted while engaging in said efforts;
9 d) All reasons why those efforts were unsuccessful.

10 **RESPONSE:**

11 There is actually no requirement that I seek
12 out anything not in my possession or control.
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3/26/2015

INTERROGATORY NO. 18: Since January 1, 2015, have you ever expressed to or received from another person, friend or lawyer any fact(s) or opinion(s) about Plaintiff? If your answer was "yes", provide:

- a) The real life names and internet pseudonyms of all such persons, all witnesses to such communications and all persons who gained either direct or hearsay knowledge of said communications;
- b) The real life names, internet pseudonyms, current email and residence addresses, and telephone numbers of all persons described above;
- c) The means of communication you used in each case (face to face, phone, email, U.S. postal mail, internet, other);
- d) A full unabridged unedited true and correct copy of all email or other internet-based communications that involved typed words. Here, "internet-based" means communications that took place by email, by theologyweb.com's private messaging service, by posting to any publicly accessible or membership only accessible website, web forum or web discussion board, and other internet-based written messages.
- e) The dates all communications took place, whether internet-based or not internet based.
- f) For all cases where you assert a communication took place only over the phone or face-to-face, the dates and times all such alleged communications took place, the phone numbers you and the other persons were using during those respective conversations, if any, and for face-to-face communications, the exact physical location, with address, where you were while such face-to-face communications were in progress.

g)

ANSWER:

Doscher used some of the information provided from this to send harassing and threatening emails to people in December 2015. That helped earn him a denial of further discovery in January 2016 when the judge found that he'd abused the discovery process.

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8 **REQUEST FOR PRODUCTION NO. 18:** 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:**

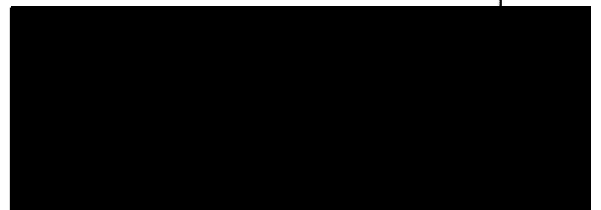
12 **INTERROGATORY NO. 19:** Have you, at any time since May 1, 2015, deleted any
13 electronic communication, from you or to you, in which either sender or receiver, or both,
14 mentioned any fact or opinion about Plaintiff, or mentioned any fact asserted in either the First
15 Amended Complaint or your Answer thereto in this case? If your answer is "yes", provide the
16 dates of all deletions, whether you deleted with intention to render the deleted data permanently
17 unrecoverable, a specific description of all words contained in all such deleted material, all
18 reasons why those files were deleted, and the names, internet pseudonyms, current email and
19 residence addresses and current phone numbers of all persons you contacted, if any, in effort to
20 recover said information.

21 **ANSWER:**

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

RESPONSE:

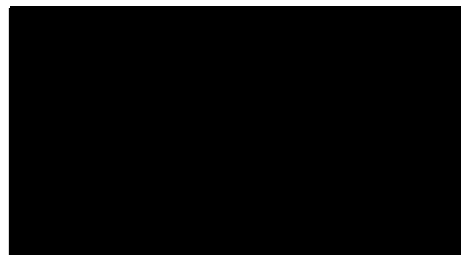
Plaintiff's First Set Of Interrogatories
And Requests For Production
To Defendant James Patrick Holding - 15



INTERROGATORY NO. 20: Provide the title of, or otherwise identify with specificity, any and all documents, recordings and any other tangible evidence that you intend to depend on for any trial or pretrial purpose in this lawsuit.

ANSWER:

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8 **REQUEST FOR PRODUCTION NO. 20:** Provide a true and correct copy of all documents,
9 recordings and any other tangible evidence you identified in your answer to the preceding
10 Interrogatory.

11 **RESPONSE:**

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13 **INTERROGATORY NO. 21:** Provide the full name, current residence and business
14 addresses, current phone numbers, current email addresses and blog or website address, if any, of
15 each and every person, whether expert or non-expert, whose testimony you plan to use in any
16 way, shape or form for any trial or pre-trial purpose in this case. For any *experts* that you name,
describe:

- 17 a) The subject matter on which the expert is expected to testify; None
18 b) The substance of the expert testimony intended to be used in this case;
19 c) The manner in which they obtained their personal or hearsay knowledge of the facts they
20 will be testifying about;
21 d) Opinions the expert is expected to defend, and the grounds for each;
22 e) Each expert's full unabridged curriculum vitae, with updated contact information for each
23 alleged educational institution;
24 f) Books or publications authored or edited by the expert which contain the type of
25 testimony expected to be used in this case;
g) any correspondence or other communications exchanged between you and all such
experts between May 1, 2015 and September 5, 2015.

For all persons who will be testifying in a *non*-expert capacity, describe:

- a) The specific subject matter on which the non-expert is expected to testify;
b) The substance of the non-expert testimony intended to be used in this case;
c) The manner in which they obtained their personal or hearsay knowledge of the facts they
will be testifying about;

Plaintiff's First Set Of Interrogatories

And Requests For Production

To Defendant James Patrick Holding - 17

A great mystery: Who would Doscher suppose I needed to enlist
expert witnesses? And why would he think I was talking with them
months before I knew who he was, and before he filed suit?

- 1 d) Opinions the non-expert is expected to defend, and all grounds for each;
2 e) Name and address of each educational institution each non-expert attended, starting with
3 and including high school, if any;
4 f) Books or publications authored or edited by the non-expert;
5 g) Any correspondence or other communications exchanged between you and all such non-
6 experts between May 1, 2015 and the day you mail your discovery answers herein back
7 to Plaintiff.

8 **ANSWER:**
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REQUEST FOR PRODUCTION NO. 21: 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. 22: For each person you identified in the preceding Interrogatory, state whether they have ever been married, and if so, the names, current residence and email addresses and current phone numbers of each all their current and former spouses.

ANSWER:

None

REQUEST FOR PRODUCTION NO. 22: 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. 23: Plaintiff intends to make certain people into additional Defendants or witnesses in this case due to Plaintiff's belief that they libeled Plaintiff. The theologyweb.com pseudonyms of these potential parties/witnesses are stated in non-case sensitive spelling as follows: "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". Provide the real-life and current legal names, current email and residence addresses and current phone numbers of all persons who ever used the above-named internet pseudonyms at theologyweb.com. For all persons responsive to this interrogatory, whose real-life names and/or personal contact information you don't know, state with specificity each step you took to gain that information, the dates you took each such step, the names, current email and residence addresses and current phone numbers of the person(s) you contacted in effort inquire about and/or recover that information, and all reasons why said steps were unsuccessful.

ANSWER:

Another great mystery was why Doscher supposed I knew any of these people that well. The vast majority, to me, are just TWeb usernames, as noted. I was also under no obligation to ask after their information. That was his job, even if he couldn't afford the subpoenas. About a third of those people live in foreign countries, which makes a summons even more expensive.

REQUEST FOR PRODUCTION NO. 23: 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. 24:** For each potential party/witness you identified in the
2 preceding Interrogatory, who was at least 18 years of age on or before August 7, 2015, state
3 a) the name and address of each public or private educational institution, schools,
4 universities, colleges, they ever attended between and starting with high school and
5 August 1, 2015;

6 **ANSWER:**

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

12 **RESPONSE:**

INTERROGATORY NO. 25: Identify any and all oral, written, and recorded statements obtained by you, or on your behalf, from any individual, in which such oral, written or recorded statements assert any type of fact or opinion about Plaintiff. Limit your answer to just the oral, written and recorded statements you obtained between January 1, 2015 and September 4, 2015. For each such statement provide:

- a) the names, current email and residence addresses, current phone numbers and current occupations of the person who made the statement(s);
- b) the date you obtained the statement(s);
- c) the manner in which you received the statements (email, internet, postal mail, phone, etc);
- d) whether the statement is oral, written or recorded;
- e) if written or recorded: state the current residence addresses, current phone numbers, and current emails of the person(s) who has(have) custody of the statement;
- f) all facts and opinions about Plaintiff asserted in each such statement; and if recorded, the date time and physical address where such recording occurred.

ANSWER:

REQUEST FOR PRODUCTION NO. 25: Provide a true and correct copy of any and all documents and recordings which you currently have access to, or which you are capable of obtaining, which support your answer to the preceding Interrogatory.

RESPONSE:

INTERROGATORY NO. 26: Describe in specified detail and in consecutive earliest-to-latest fashion (complete with dates), each and every step you took since "B&H" became a member of theologyweb.com, in the effort to identify the real-life name of the person posting at theologyweb.com under the pseudonym "B&H". For all persons who provided you with any assistance, information or evidence on B&H's identity, state their current email and residence addresses, current phone numbers, each of their respective internet pseudonyms, if any, and specify in what exact ways they helped you to identify the real-life identity of "B&H".

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8 **REQUEST FOR PRODUCTION NO. 26:** 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 **INTERROGATORY NO. 27:** Has any person you identified anywhere in your answers to
13 this set of discovery requests, with the exception of Plaintiff, ever been convicted of any crime
14 on or after September 5, 2005? If your answer is "yes", provide

- 15 a) the real-life name and internet pseudonym of each such potential witness;
16 b) the specific crimes they were charged with;
17 c) the specific crime(s) the court(s) found them guilty of;
18 d) the dates of all such convictions;
19 e) whether they were found guilty by plea deal, bench trial or jury trial;
20 f) the full name and number of the court case showing such adjudication of guilt;
21 g) the name, city and state of the Court (not the judge) in which they were found guilty.

22 You are reminded that some traffic offenses, such as driving with a suspended or expired license,
23 are considered misdemeanor crimes in some states. Do not exclude any criminal convictions that
24 were subsequently dismissed, vacated, sealed or otherwise voided or reversed. For all persons
25 responsive to this interrogatory, whose real-life names and/or personal contact information you
don't know, state with specificity each step you took to gain that information, the dates you took
each such step, the names, current email and residence addresses and current phone numbers of
the person(s) you contacted to recover that information, and why said steps were unsuccessful.

ANSWER:

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

9 **RESPONSE:**

10 **INTERROGATORY NO. 28:** Has any person you identified anywhere in your answers and
11 responses to this first set of discovery requests, including yourself, with the exception of
12 Plaintiff, ever been a party, witness or juror in any civil litigation at any time since September 5,
2013? If your answer is "yes", provide:

- 13 a) the real-life name of each such potential witness;
14 b) the internet pseudonyms they posted under at theologyweb.com or at any other website at
15 any time between August 1, 2014 and August 1, 2015;
16 c) the title and number of each such court case they were involved with;
17 d) the nature of said involvement (Plaintiff, Defendant, witness, juror);
18 e) all facts any attempted to be established by any such person who was a party or witness;
19 f) for all such persons who were actual parties, whether they won, lost or settled their lower
20 court case and whether they won or lost any appeal of such lower court judgment.

21 For all cases where the party won or lost, provide the type and amount, if any, of damages,
22 awarded to Plaintiff by either Court or jury. You are reminded that family cases, child custody
23 cases and divorce cases constitute 'civil litigation'.

24 **ANSWER:**
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