

REQUEST FOR PRODUCTION NO. 28: 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. 29: With the exception of Plaintiff, provide the internet pseudonyms and real-life names (and website/email addresses and residence addresses, if obtainable by you) of any and all *non*-Christians with whom you have ever debated or discussed, by means of email or the internet, any biblical, philosophical or religious subject of any sort. Limit your answers to all such debates/discussions that took place on or after September 5, 2005. For all debates/discussions that took place on any internet website, give the full website address to the beginning post for each such debate and discussion. Do not exclude any website articles you have written to respond to or refute such non-Christians.

ANSWER:

Yeah, seriously. Ten years of online debates, and he expected ME to collect them all for him. He also wanted them all printed out on paper. My attorney taught me that there's no obligation to give in to absurd demands like these, especially when he can get these things himself. As it is, however, I just don't have a record of these things anyway.

1 **REQUEST FOR PRODUCTION NO. 29:** Provide a copy of each email or post within each
2 internet-based debate or discussion you identified in your answer to the preceding Interrogatory.
3 For all requested information which you no longer have access to, state the date each became
4 inaccessible to you, all reasons why it became inaccessible to you, all efforts you made to
5 recover the information, the current residence addresses, current phone numbers, current email
6 addresses and internet pseudonyms, if any, of all persons you communicated with during said
7 efforts, and why those efforts were unsuccessful.

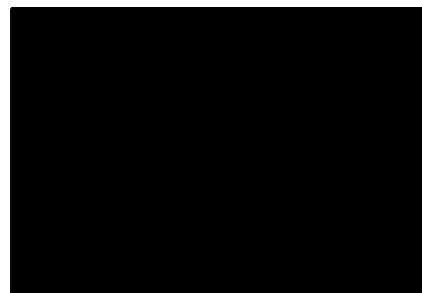
8 **RESPONSE:**

9 **INTERROGATORY NO. 30:** For all the statements credited to you in the First Amended
10 Complaint, which you intend to admit being the author of, what State were you in when you
11 emailed/posted them? If all said posting and emailing was done from within the State of
12 Florida, specify so. For any such information that you posted or emailed from any location
13 *outside* the State of Florida, specify the information posted or emailed, the paragraph number and
14 page where it is located in the First Amended Complaint, the name of the City and State you
15 were in at the time you posted/emailed these, and the reasons why you were outside Florida State
16 during these postings/emailings.

17 **ANSWER:**

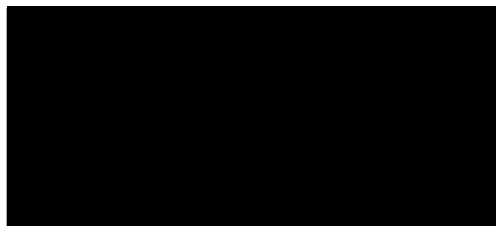
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21 **REQUEST FOR PRODUCTION NO. 30:** Provide a true and correct copy of any and all
22 documents which you currently have access to, or which you are capable of obtaining, which
23 support your answer to the preceding Interrogatory.

24 **RESPONSE:**



INTERROGATORY NO. 31: For all affirmative defenses and any other defenses you intend to claim for any trial or pre-trial purpose in this case, describe with specificity each and every evidentiary fact, not ultimate fact or legal conclusion, upon which you intend to depend to justify said defenses.

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1 **REQUEST FOR PRODUCTION NO. 31:** Provide a true and correct copy of any and all
2 documents which you currently have access to, or which you are capable of obtaining, which
3 support your answer to the preceding Interrogatory.

4 **RESPONSE:**

5 **INTERROGATORY NO. 32:** For every quotation of your words appearing in the First
6 Amended Complaint, which you say were *not* expressions of fact but expressions of opinion
7 only, quote the entire phrase you say constituted only opinion, provide the paragraph and page
8 number where they can be found in said Complaint, and the evidence from the immediate and
9 larger context where those assertions were originally made by you, which context you believe
10 would have tipped off the reasonable reader that you were expressing *only opinions* and not
11 facts. For every quotation of your words appearing in the First Amended Complaint, which you
12 say constituted *truthful statements of fact* about Plaintiff, quote the entire phrase you say
13 constituted such truthful fact, provide the paragraph and page number where they can be found in
14 said Complaint, and the full evidentiary basis of your prior investigation, if any, which led you to
15 believe that such information constituted truthful fact about Plaintiff.

16 **ANSWER:**

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22 **REQUEST FOR PRODUCTION NO. 32:** The documentation should show the date, subject,
23 content and manner of each such communication, along with all input therein made by you and
24 any other third-party throughout the duration of said specific communications.

25 **RESPONSE:**

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3 **INTERROGATORY NO. 33:** Provide an exhaustive list of every action you took to cause
4 search engines to either index or prioritize your "Internet Predator Alert" ('IPA').
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13 **REQUEST FOR PRODUCTION NO. 33:** Provide a true and correct copy of any and all
14 documents which you currently have access to, or which you are capable of obtaining, which
15 support your answer to the preceding Interrogatory.
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17 **RESPONSE:**

18 **INTERROGATORY NO. 34:** Who is the Internet Service Provider ('ISP') for tektonics.org,
19 and in what state does their server containing your IPA reside?
20

21 **ANSWER:**

Doscher apparently does not know the
difference between an ISP and a
webhost.

22 **REQUEST FOR PRODUCTION NO. 34:** Provide the name, address, phone number and
23 email of said ISP, in a document showing such.
24

25 **RESPONSE:**

1 **INTERROGATORY NO. 35:** Since July 10, 2015, did the ISP for tektonics.org
2 communicate to you, or did you communicate to said ISP, anything about the content of your
3 Internet Predator Alert ('IPA' located at <http://www.tektonics.org/skepticbud.htm>)? If your
4 answer is "yes", state with specificity:

- 5 a) all means of communication involved (phone, email, postal mail, internet, etc);
6 b) the dates of all such communications;
7 c) the current residence addresses, current phone numbers, current email addresses and
8 internet pseudonyms, if any, of all persons with whom you communicated;
9 d) the person(s) who initiated or started each such communication;
10 e) the current residence addresses, current phone numbers, current email addresses and
11 internet pseudonyms, if any, of all persons with whom you communicated anything about
12 said communications with said ISP;
13 f) all words the ISP communicated to you, all words you communicated to the ISP, all
14 words you communicated to the other persons, and all words such other persons
15 communicated to you.

16 **ANSWER:**

17 No, I never heard from them. Doscher asked a
18 lot of questions like these, where he wanted to
19 know if I'd ever heard back from people he'd
20 complained to. I never did, except for
21 responses like, "Who is this nut?"

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

4 **RESPONSE:**

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6 **INTERROGATORY NO. 36:** Who is the ISP for theologyweb.com, and in what state does
7 their server, containing the "tektonics" sub-forum of theologyweb, reside? (04)

8 **REQUEST FOR PRODUCTION NO. 36:** 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. 37:** Did you ever communicate with the ISP for theologyweb.com,
13 or did the ISP of theologyweb.com ever communicate to you any fact or opinion you asserted
14 about Plaintiff at theologyweb.com? If your answer is "yes", state with specificity:

- 15 a) all means of communication involved (phone, email, postal mail, internet, etc);
16 b) the dates of all such communications;
17 c) the current residence addresses, current phone numbers, current email addresses and
18 internet pseudonyms, if any, of all persons with whom you communicated;
19 d) the person(s) who initiated or started each such communication;
20 e) the current residence addresses, current phone numbers, current email addresses and
21 internet pseudonyms, if any, of all persons with whom you communicated anything about
22 said communications with said ISP;
23 f) all words the ISP communicated to you, all words you communicated to the ISP, all
24 words you communicated to the other persons, and all words such other persons
25 communicated to you.

ANSWER:

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part all

REQUEST FOR PRODUCTION NO. 37: 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. 38: For each person, with exception of Plaintiff and yourself, whom you believe has or may have first-hand, second-hand or third-hand knowledge of evidentiary facts alleged within either or both First Amended Complaint and/or your Answer thereto, describe as specifically as possible:

- a) The real-life name, current residence address, current phone number and current email address of each such potential witness;
- b) Any and all internet-pseudonyms and email addresses each such potential witness has ever used within the last year
- c) the specifics of the knowledge you believe each such potential witness has, and
- d) the sources (including names, dates, documents, websites, residence addresses, phone numbers and email addresses) from which each such potential witness obtained said knowledge.

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 addresses, residence addresses and current phone numbers of the person(s) you contacted to recover that information, and why said steps were unsuccessful.

ANSWER:

Hilarious in good measure because Doscher can't do anything with these people (except harass them). He sure can't afford to use them as witnesses. That would mean paying for their depositions, travel, etc.

REQUEST FOR PRODUCTION NO. 38: 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. 39: For every person you identify anywhere in your answers and responses to these discovery requests, with the exception of Plaintiff, have any of them kept any diary, journal, itinerary, list or chart of events, schedules/agendas, digests, calendars, notes, computer files, emails or any type of recorded comment or remarks at any time since January 1, 2014, electronic or non-electronic, in which were asserted or discussed any evidentiary facts that are mentioned within the First Amended Complaint or in your Answer thereto? If your answer is "yes", state:

- a) The type of documents;
- b) The dates of the entries;
- c) The name, residence address, email address and phone number of the person who authored the document;
- d) The purpose of you or other author of the document in maintaining it;
- e) The name, residence address, email address and phone number of the person who presently has possession of the document;
- f) The name, residence address, email address and phone number of the persons with whom you, if ever, discussed the contents of each such document.

ANSWER:

What? Digests? Calendars? Notes? Who gets this obsessed to keep such things about such piddly little concerns? And why would I even know if they kept such things anyway, especially since none of them lived anywhere near me and I only knew them by email or by TWeb?

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6 **REQUEST FOR PRODUCTION NO. 39:** 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.

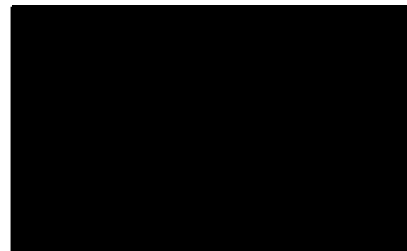
9 **RESPONSE:**

10 **INTERROGATORY NO. 40:** Identify all statutes, ordinances, regulations, rules, standards,
11 guidelines, legal authorities on evidence, legal authorities on law and any other written sources
12 of authority upon which you intend to rely to support any factual or legal defense against
13 Plaintiff's allegations in the First Amended Complaint in this case. (In the alternative, you may
14 attach a full unabridged unedited copy of each).

15 **ANSWER:**

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22 **REQUEST FOR PRODUCTION NO. 40:** 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. 41:** State in full and with specificity any and all of your motives in
2 starting the "The 'Secret Identity' of Skepticbud aka spirit5 aka Debunked aka B&H aka"
3 thread at theologyweb.com ('skepticbud thread').

4 **ANSWER:**

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9 **REQUEST FOR PRODUCTION NO. 41:** 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:**

13 **INTERROGATORY NO. 42:** For all persons who used theologyweb's private messaging
14 service or email to request any details from you about Plaintiff, describe with specificity:

- 15 a) the name they posted under on theologyweb.com at the time they initiated said contact
16 with you and at the time you initiated said contact with them;
17 b) their real-life name, current residence address and current phone number;
18 c) their email address;
19 d) all words you and they exchanged during such communications;
20 e) the date such communications were made;

21 For all requested information which you no longer have access to, state the date each became
22 inaccessible to you, all reasons why it became inaccessible to you, all efforts you made to
23 recover the information, the current residence addresses, current phone numbers, current email
24 addresses and internet pseudonyms, if any, of all persons you communicated with during said
25 efforts, and why those efforts were unsuccessful.

ANSWER:

1 **REQUEST FOR PRODUCTION NO. 42:** Provide a true and correct copy of any and all
2 documents which you currently have access to, or which you are capable of obtaining, which
3 support your answer to the preceding Interrogatory.

4 **RESPONSE:**

5 **INTERROGATORY NO. 43:** State the real-life names, current residence and email
6 addresses and current phone numbers of each of theologyweb.com's
7 past and present owners,
8 past and present moderators, as well as
9 any and all internet-pseudonyms they identified themselves with at theologyweb.com at any time
10 between January 1, 2008 and September 5, 2015.

11 **ANSWER:**

12 **REQUEST FOR PRODUCTION NO. 43:** 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. 44:** Describe in detail any and all business relationships, donative
17 relationships, personal relationships, fiduciary relationships or any other types of relationships
18 that have ever existed between you and any past or present owner or member of
19 theologyweb.com since August 4, 2013. For all such persons who have ever donated money to
20 your non-profit ministry, state their real-life names, their respective internet pseudonyms, and the
21 total amount of money they donated between August 3, 2013 and August 3, 2015.

22 **ANSWER:**