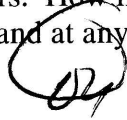


1 **REQUEST FOR PRODUCTION NO. 44:** Provide a true and correct copy of any and all
2 documents which you currently have access to, or which you are capable of obtaining, which
3 support your answer to the preceding Interrogatory.

4 **RESPONSE:**

5 **INTERROGATORY NO. 45:** In your IPA and in the skepticbud thread, you accuse Plaintiff
6 several times of 'nuisance' postings, cyberstalking, and spamming others. How many new
7 discussion threads do you believe Plaintiff started at theologyweb.com and at any other website
8 since August 3, 2013? Provide the title of each such thread or post. 

9 **ANSWER:**

10 **REQUEST FOR PRODUCTION NO. 45:** Provide an unabridged full complete unedited
11 print out of each and every discussion thread from any website, which thread you believe
12 contains 'nuisance' posts by Plaintiff. The pages should be printed on only one side.

13 **RESPONSE:**

14 If Doscher asks you stuff like this, answer: "No, you get them
15 yourself. You have a computer. And courts have decided that
16 there's no obligation to present such things in the demanded
17 format. All I have to present is the URLs."
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1 **INTERROGATORY NO. 46:** On May 6, 2015, Plaintiff forwarded to your email a reply he
2 received from a Fuller Theological Seminary teacher. In your May 7 reply to Plaintiff, you say:

3 Sounds like good reason for me to report you for stalking!

4 Describe with specificity:

- 5 a) Each and every factual basis for your believing Plaintiff's forwarding to you a reply he
6 received from Fuller Theological Seminary, constituted Plaintiff's "stalking" you;
7 b) what agency you were allegedly going to 'report' Plaintiff to;
8 c) whether or not you did, in fact, report him, and;
9 d) if you did report him, state the name, address and phone number of the person, business,
10 agency or entity you communicated said report to, the report number and all words used
11 in your report;
12 e) any and all replies to you by said persons, businesses, agencies or entities.

13 **ANSWER:**

14
15 **REQUEST FOR PRODUCTION NO. 46:** Provide a true and correct copy of any and all
16 documents which you currently have access to, or which you are capable of obtaining, which
17 support your answer to the preceding Interrogatory.

18 **RESPONSE:**

19
20 **INTERROGATORY NO. 47:** Since January 1, 2015, have you ever *directly* communicated
21 to Plaintiff, by email, phone, face to face or internet-based service, any desire on your part that
22 he cease contacting you, yes or no? If your answer was "yes", provide the date, means of
23 communication, and exact words you communicated to Plaintiff. If you did not, explain all your
24 reasons for choosing, since January 1, 2015 to avoid directly telling Plaintiff to cease
25 communicating with you.

ANSWER:

REQUEST FOR PRODUCTION NO. 47: 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. 48:** What is or was the date of the most recent post within the
2 theologyweb.com thread entitled "The 'Secret Identity' of Skepticbud aka spirit5er aka Debunked
3 aka B&H aka" ?

4 **ANSWER:**

5 **REQUEST FOR PRODUCTION NO. 48:** Provide a print-out showing in consecutive
6 earliest-posting-to-latest-posting fashion, each and every post made by anybody to that thread,
7 especially including any and all posts posted there between June 6, 2015 and August 1,
8 2015.

9 **RESPONSE:**

10 **INTERROGATORY NO. 49:** In your Internet Predator Alert ('IPA'), located at
11 <http://www.tektonics.org/skepticbud.htm>, you assert about Plaintiff as follows:

12 He will grossly misrepresent his opponents in third-party exchanges,
13 presenting their arguments to third parties (particularly scholars) in a grossly simplistic fashion,
14 which the third party will criticize based on his inadequate summary.
15 He will then claim that said third party (often a scholar) has debunked his opponents' arguments.

16 Describe with specificity:

- 17 a) the real-life name and pseudonyms of all said "opponents";
18 b) all reasons you have for thinking Plaintiff "grossly misrepresents" said opponents;
19 c) The real-life names and internet pseudonyms, if any, of all said "third-parties", including
20 but not limited to "scholars";
21 d) the "arguments" of said opponents;
22 e) all reasons you think Plaintiff presented said arguments "in grossly simplistic fashion"
23 f) the 'criticisms' said third parties gave;
24 g) all reasons why you think the allegedly grossly simplistic presentation of Plaintiff
25 constituted "inadequate summary".
26 h) links where such alleged misrepresentations, grossly simplistic presentations, third party
27 critiques and inadequate summaries can be accessed on the internet, if any.
28 i) All reasons why you did not provide a link or any specifics about these matters in your
29 IPA

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

35 **ANSWER:**

Plaintiff
Answer
To Defendant

I found it harder to take queries like these seriously as I learned more about borderline personality disorder. The BPD can't bear criticism, and anyone who criticizes them will be made the subject of intense anger. Interrogatories like these weren't about getting evidence for trial; they were about Doscher abusing the discovery process to call me to account for my daring to question him.

REQUEST FOR PRODUCTION NO. 49: 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. 50: In your updated IPA, you assert as follows:

His real name is Christian Behrend Doscher.

Give the date you *originally* posted the IPA to your website tektonics.org, and the date you first included Plaintiff's full legal name in it.

ANSWER:

REQUEST FOR PRODUCTION NO. 50: Provide separate true and correct copies of each of the following: the original version of your IPA, the first updated version of the IPA, the second updated version and all respective subsequently updated versions, if any.

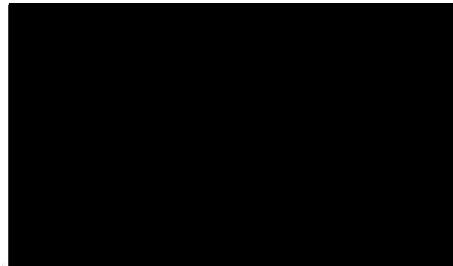
RESPONSE:

INTERROGATORY NO. 51: Provide each and every evidentiary fact, not ultimate fact, upon which you based your belief, stated in the IPA, that Plaintiff has ever posted on the internet under the following pseudonyms: Defunked, RagnarLothbrok, YahWhat, Faith Slayer, Richard (or "Dick") Wozinya. Do not exclude evidentiary information you once believed but no longer find convincing.

ANSWER:

REQUEST FOR PRODUCTION NO. 51: Provide a true correct unabridged copy of any and all emails, voice recordings, written records or internet-based words supporting your answer to the preceding Interrogatory.

RESPONSE:



1 **INTERROGATORY NO. 52:** Give the time, date, and all means of communication (phone,
2 email, internet, postal mail. etc), for any and all discussions about Plaintiff that you ever had with
3 any law-enforcement personnel, including but not limited to any discussions about Plaintiff you
4 had with one "Leonardo Gomez". For any communication that did not involve creation of any
5 electronic or written report/record, describe with specificity all concerns expressed to you by any
6 such law-enforcement person, all of your replies to same, and any responses by you and said
7 person thereafter, including all concluding words.

8 **ANSWER:**

"Concerns" -- none. Doscher dreamed of
such things being brought to me by
persons of authority. It never happened,
and is not likely to ever happen.

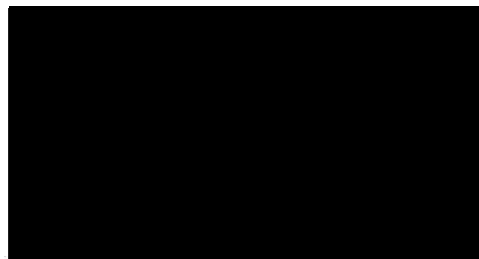
9 **REQUEST FOR PRODUCTION NO. 52:** Provide a true correct unabridged copy of any and
10 all emails, voice recordings, written records or internet-based words supporting your answer to
11 the preceding Interrogatory.

12 **RESPONSE:**

13 **INTERROGATORY NO. 53:** Did you ever disclose to any person the fact that you had
14 communicated facts about Plaintiff to Florida law enforcement? If your answer is "yes", provide
15 the name, current residence address, current phone number and current email address of all
16 persons to whom you so communicated, the full content of your comments to them, the full
17 content of their reply to you, if any, and the content of any and all further replies/responses
18 thereto.

19 **ANSWER:**

(04)



1 **REQUEST FOR PRODUCTION NO. 53:** Provide a true correct unabridged copy of any and
2 all emails, voice recordings, written records or words anybody posted to public or private areas
3 of the internet, which you currently possesses or are capable of obtaining, which support your
4 answer to the preceding Interrogatory.

5 **RESPONSE:**

6 **INTERROGATORY NO. 54:** ~~Describe with specificity all evidentiary facts, not ultimate~~
7 ~~facts or legal opinions, upon which you intend to justify your belief that the original version of~~
8 ~~your IPA did not violate Florida statute 836.02 while it stood publicly accessible missing~~
9 ~~Plaintiff's full legal name.~~ (12)

10 **ANSWER:**

11 **REQUEST FOR PRODUCTION NO. 54:** Provide a true and correct copy of any and all
12 documents which you currently have access to, or which you are capable of obtaining, which
13 support your answer to the preceding Interrogatory.

14 **RESPONSE:**

15 **INTERROGATORY NO. 55:** In your IPA, you state as follows:

16 He will "spam" (send unwanted, unsolicited messages) to multiple parties,
17 and to Biblical scholars,
18 misrepresenting himself as an honest inquirer
19 or as a Christian and portraying himself as an innocent victim.
20 If he disagrees with you in a particularly violent way, he will also sign you up for subscriptions to various email
21 newsletters and sales,
22 including of a sexual nature. (64)

23 Describe with specificity:

- 24 a) the full exact content of any and all "spam" messages you believe Plaintiff ever sent to
25 non-scholars;
26 b) the email and IP addresses all such spam originated from;
27 c) the dates they were sent, the means by which they were sent;
28 d) identify the internet-pseudonyms and real-life names, current residence and email
29 addresses and current phone numbers of all such "other persons";
30 e) the exact content of any "spam" messages you believe Plaintiff ever sent to "Biblical
31 scholars";
32 f) the content, if any, you believe Plaintiff should have, but did not, include in his 'spam' to
33 any scholars and non-scholars;
34 g) all evidentiary facts, not ultimate facts, to justify your belief that inclusion of the extra
35 material you identify above would have caused the biblical scholar to render a more
36 favorable opinion of you or your arguments;

- 1 h) all reasons why you believe less harm would have been done had Plaintiff not sent such
2 alleged "spam" to bible scholars;
3 i) all evidentiary facts, not ultimate facts, upon which you depend to justify your statement
4 that Plaintiff misrepresents "himself as an honest inquirer" to such people or scholars; an
5 j) any and all evidentiary facts, not ultimate facts, supporting your assertion that he *has*
6 ever, or *will* ever, sign up you, or other persons "for subscriptions to various newsletters
and sales, including of a sexual nature." If you cite any IP addresses, provide the dates
those addresses were recorded, what city and state or city and country each IP address
represents, the steps you took to learn such IP address information, and the names of the
persons who permitted you to learn such IP address information.

ANSWER:

10 **REQUEST FOR PRODUCTION NO. 55:** 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
support your answer to the preceding Interrogatory.

RESPONSE:

14 **INTERROGATORY NO. 56:** In the past you have criticized the way Plaintiff represented
15 your comments to bible scholars such as Context Group scholar Richard Rohrbaugh. Did you
16 ever contact or attempt to contact such scholars to clarify or correct any errant statement you
17 think Plaintiff made? If your answer is "yes", provide the name of the scholar you contacted, the
18 date of such communication, the means of such communication, all words you used in the
19 communication and all words the scholar used in reply to you, if any. If your answer is "no",
20 state all the reasons for your refusal to contact such scholars about aforesaid matters. Then
explain why, between June 2015 and July 2015, not even your updated IPA provided links or
information to document your claim that Plaintiff misrepresents himself and arguments of others
to 'biblical scholars'.

ANSWER:

REQUEST FOR PRODUCTION NO. 56: 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. 57: In your post # 45 at the "The 'Secret Identity' of Skepticbud aka spirit5er aka Debunked aka B&H aka" thread (i.e., skepticbud thread), you state as follows:

Since Bud is still signing me up for pornographic newsletters, it's time to teach him a lesson. The Predator Alert is now updated.

State with specificity:

- a) The very first date you received the "pornographic newsletters";
- b) The full email address at which you received them;
- c) The full email address and IP address from which they were sent;
- d) Each and every step you took to identify the person responsible for signing you up to receive said materials;
- e) The dates you took each such step;
- f) The names, current residence addresses, current phone numbers and current emails of all persons, businesses, agencies or entities you contacted in your effort to investigate this matter;
- g) All facts and opinions said other persons, businesses, agencies or entities expressed to you;
- h) All facts and opinions you expressed to said persons;
- i) The specific evidence that led you to believe *Plaintiff Doscher* was personally responsible for causing your email account to receive such "pornographic newsletters";
- j) All reasons why you believe it improbable that somebody other than Plaintiff was responsible for signing you up to receive those;
- k) Whether you conducted any further investigation after Plaintiff told you he was not responsible for causing you to receive such spam;
- l) If you did not conduct further investigation after Plaintiff denied responsibility for causing you to receive such spam, give all reasons why you didn't conduct such further investigation and why you didn't modify the part of your IPA accusing Plaintiff of such responsibility;

- 1 m) if you *did* engage in further investigation after Plaintiff denied being responsible for said
2 spam, what further evidence you uncovered, if any, that led you to believe there was no
3 need for you to correct or modify your original accusation that Plaintiff was responsible
4 for causing your email to receive such spam;
5 n) the names, current residence addresses, current phone numbers and current emails of all
6 persons you contacted while engaging in said further investigation;
7 o) all facts and opinions said persons expressed to you;
8 p) all facts and opinions you expressed to said persons;
9 q) The 'lesson'(s) you intended to teach Plaintiff by engaging in the above-quoted update of
10 said IPA.

11 **ANSWER:**
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4 **REQUEST FOR PRODUCTION NO. 57:** Provide a true and correct copy of any and all
5 documents which you currently have access to, or which you are capable of obtaining, which
6 support your answer to the preceding Interrogatory.

7 **RESPONSE:**

8 **INTERROGATORY NO. 58:** Between May 1, 2015 and August 1, 2015, have you ever
9 stated, implicitly or explicitly that Plaintiff should *continue* causing your email address to receive
10 spam you don't like, yes or no? (04)

11 **ANSWER:**

12 **REQUEST FOR PRODUCTION NO. 58:** 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:**

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19 **INTERROGATORY NO. 59:** In your post # 102 in the skepticbud thread, you accuse
20 Plaintiff as follows:

21 He's also denying he signed me up for all those porn newsletters and stuff.
22 Forget it Bud...one of them came in as having been registered from that Nashville ISP you use...
23 the same one you use to start your fake accounts here.
24 The staff here has it all down..so don't deny it. You outsmarted yourself with that crap. (OK)

25 State with specificity:

- a) The newsletter(s) that "came in as having been registered from that Nashville ISP" which IP you allege Plaintiff used;
- b) All steps you took to determine from what "ISP" said newsletters "came in as".

- 1 c) The names, current residence addresses, current phone numbers and current emails of all
2 persons you contacted in your effort to investigate this matter;
3 d) All words said persons expressed to you;
4 e) All words you expressed to said persons;
5 f) All facts constituting the 'has it all down' which you attribute to the "staff here".

6 **ANSWER:**

7 **REQUEST FOR PRODUCTION NO. 59:** Provide a true and correct copy of any and all
8 documents which you currently have access to, or which you are capable of obtaining, which
9 support your answer to the preceding Interrogatory.

10 **RESPONSE:**

11 **INTERROGATORY NO. 60:** In your IPA you state as follows:

12 His arguments will frequently focus on sexual themes (rape, pedophilia),
13 and he will also gratuitously read sexual language into common phrases (e.g., he will claim "you got your butt
14 kicked" is a homosexual euphemism!).

15 State the posting number, date, thread title or post title and web address of any and all "common
16 phrases" which you say Plaintiff had 'gratuitously' read sexual language into. Then explain
17 why, between June 2015 and July 2015, not even your updated IPA contained any
18 documentation to support this accusation against Plaintiff.

19 **ANSWER:**

20 **REQUEST FOR PRODUCTION NO. 60:** Provide an exhaustive and consecutive "earliest-
21 to-latest" documentation of each and every email you sent, or internet posting you posted, in
22 which you used accurate, vulgar or slang words for any human body part and/or substances or
23 odors produced by the human body, including but not limited to the quotations from you as
24 preserved at <http://the-anointed-one.com/>, and
25 <http://www.theskepticalreview.com/bobbyjerryskids.html>, and
<http://www.theskepticalreview.com/jftbobbyrestroomvisits.html>, including the thread you started
entitled "Steve Hays needs to stop passing gas at his betters" and all posts you ever posted in
rebuttal to Steve Hays. For all instances where you no longer have access to the quote or cannot
remember details of it, describe with specificity the date you confirmed your inability to obtain

Plaintiff's First Set Of Interrogatories

And
To Defendant

Can you imagine any professional attorney
composing an interrogatory like this one?