

1 the information, state the current residence addresses, current phone numbers, and current email
2 addresses, current phone numbers respective internet pseudonyms, if any, of the persons you
3 contacted in the efforts to recover this information, and why your efforts were unsuccessful.

4 **RESPONSE:**

5 **INTERROGATORY NO. 61:** In your IPA, you state as follows:

6 When trapped by his own arguments, Doscher will contrive outlandish excuses
7 and beg outlandish exceptions (as in the example of claiming documentation would be Photoshopped),
8 or else demand that a scholar be quoted validating a very specific point made
(though he will seldom provide such quotes himself).
Note that in his earliest incarnations, Doscher called quoting of scholars childish.

9 Give the date, time and full content of any and all discussions threads containing posts of
10 Plaintiff you know of, where he

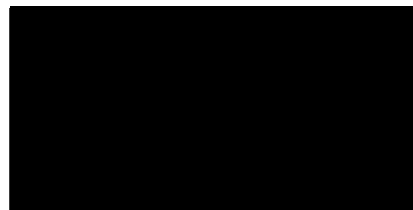
- 11 a) contrived "outlandish excuses" after being trapped;
- 12 b) Begged "outlandish exceptions" after being trapped;
- 13 c) demanded "that a scholar be quoted validating a very specific point made", and
- 14 d) why you believe Plaintiff's known instances of requesting scholarly support for a very
specific point made, is any type of deficiency in Plaintiff that should be of any degree of
concern to the general public you aimed your IPA at;
- 15 e) any dangers you feel the general public would be risking if they engaged in dialogue with
Plaintiff without knowing that he has previously demanded that "a scholar be quoted
validating a very specific point made";
- 16 f) The full discussion threads containing the post or posts wherein "Doscher called quoting of
scholars childish";

17 If you document your answers from any posts at theologyweb, provide a copy of the entire
18 thread such posts are found in, not just the individual post in question.

19 **ANSWER:**

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21
22 **REQUEST FOR PRODUCTION NO. 61:** 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. 62:** In your IPA, you state as follows:

2 Those contacted by Doscher are hereby warned that disagreeing with him, even politely, will likely result in
3 him spamming your website or blog with nuisance posts,
4 cyberstalking,
5 and bullying.

6 If he comes to your blog or website, he should be banned immediately.

7 State the exact web addresses for all of the websites and blogs that you did *not* wish Plaintiff to
8 be banned from, if any, and explain why you didn't identify all those websites/blogs in your IPA
9 or elsewhere. Also, explain with specificity why you expected any member of the general public
10 reading your IPA to understand that you didn't want Plaintiff banned from the websites you now
11 list in answer to this interrogatory. If you intended *all* readers of this IPA, who had websites or
12 blogs to ban Plaintiff immediately, specify so.

13 **ANSWER:**

14 **REQUEST FOR PRODUCTION NO. 62:** Provide a true and correct copy of any and all
15 documents which you currently have access to, or which you are capable of obtaining, which
16 support your answer to the preceding Interrogatory.

17 **RESPONSE:**

18 **INTERROGATORY NO. 63:** What other persons, if any, besides Plaintiff, have you ever
19 tried to get banned from any internet blogs or websites? For all such persons, provide their real-
20 life name, any and all internet pseudonyms they used at the time you attempted to get them
21 banned, their current residence addresses, current phone numbers and current emails, the exact
22 words you used in the attempt to get them banned, and the website addresses where such
23 attempts can found or were found in the past, as well as the response to your banning request by
24 any blog owners/website owners. For all instances where you no longer have access to the
25 information or cannot remember details of it, describe with specificity the date you confirmed
your inability to obtain the information, state the current residence addresses, current phone
numbers, and current email addresses, current phone numbers respective internet pseudonyms, if
any, of the persons you contacted in the efforts to recover information responsive to this
interrogatory, and why your efforts were unsuccessful.

ANSWER:

1 **REQUEST FOR PRODUCTION NO. 63:** 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. 64:** In your IPA, you state as follows:

6 Explanation: The TheologyWeb forum software tracks the IP address of every post made there.
7 Forum staff have access to this information.
8 They are also able to compile reports showing IP addresses used by each specific user. *not 2/59*

9 Describe with specificity:

- 10 a) the name of the software TheologyWeb uses to track the IP address of every post;
11 b) the real-life name of each "forum staff" persons, including their respective current or
12 former theologyweb nicknames or pseudonyms, if any, who permitted you to access the
13 IP addresses that you associate with Plaintiff;
14 c) A report giving a compiled accounting showing IP addresses used by Plaintiff for all of
15 his postings to theologyweb.com.

16 **ANSWER:**

17 **REQUEST FOR PRODUCTION NO. 64:** Provide a true and correct copy of any and all
18 documents which you currently have access to, or which you are capable of obtaining, which
19 support your answer to the preceding Interrogatory.

20 **RESPONSE:**

21 **INTERROGATORY NO. 65:** Provide the name, address, website, email and phone number
22 of each and every attorney with whom you ever discussed any factual matter contained in both
23 the First Amended Complaint and contained in your Answer thereto. Specify all mediums of
24 communication you used to engage in these communications with these attorneys (i.e. telephone,
25 face-to-face, email, physical US Postal mail, internet, etc). *(att. prus)*

ANSWER:

REQUEST FOR PRODUCTION NO. 65: 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. 66: How many times since September 5, 2013 have you communicated a fact or opinion about Plaintiff to any third party with the intent to convince said third party to view Plaintiff with any type or degree of hatred, distrust, ridicule, contempt or disgrace? For each time, specify the date, the method of communication used (email, internet, web-based private messaging system, etc), the physical address you were located at during any face-to-face communications, the full exact content of each such attempt, and the full exact content of the rest of each such discussion.

ANSWER:

REQUEST FOR PRODUCTION NO. 66: 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. For every discussion thread or email in which material responsive to the preceding Interrogatory appears, provide a full copy of the entire discussion thread, not just the specific posting containing said material. For all documentation you no longer possess, provide the date it became inaccessible, all reasons why it became inaccessible, each step you took to recover that information, the names, current residence addresses, current phone numbers and current email addresses of all persons you contacted during such efforts, and all reasons why those efforts were unsuccessful.

RESPONSE:

INTERROGATORY NO. 67: How many times since August 1, 2013 has a third party expressed to you that they viewed Plaintiff with any degree of hatred, distrust, ridicule, contempt or disgrace?

ANSWER:

1 **REQUEST FOR PRODUCTION NO. 67:** For every email or internet post responsive to the
2 preceding Interrogatory, provide said third parties' names, current residence addresses, current
3 phone numbers and current email addresses as well as the dates, website addresses, email
4 addresses and exact content of the words used by such third parties, including all
5 responses/replies by you and them. For all documentation you no longer possess, provide the
6 date it became inaccessible, all reasons why it became inaccessible, each step you took to
7 recover that information, the names, current residence addresses, current phone numbers and
8 current email addresses of all persons you contacted during such efforts, and all reasons why
9 those efforts were unsuccessful.

10 **RESPONSE:**

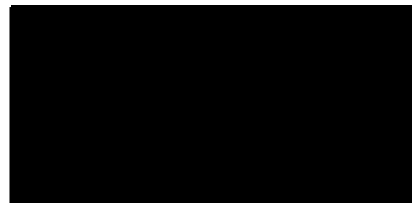
11 **INTERROGATORY NO. 68:** Since September 1, 2014, have any bible scholars ever talked
12 to you about the subjects of modern-day Christians insulting non-Christian bible critics? If your
13 answer is "yes", give the name, current residence address and email address, website and current
14 telephone number of each such scholar, the date of the communication, the method of
15 communication (phone, email, internet, US Postal mail, etc), all words you communicated to the
16 scholars and all words the scholars communicated to you.

17 **ANSWER:**

18 There were several questions of this type, none of which
19 would have had any bearing on questions of libel or
20 defamation. It's just another way for Doscher to abuse the
21 discovery process to call me to account for daring to offend
him.

REQUEST FOR PRODUCTION NO. 68: 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. 69:** How many people have you insulted during the course of any
2 internet-based or email-based discussion or debate? Limit your answer to all instances occurring
3 between September 1, 2005 and September 1, 2015.

- 4 a) provide a full and complete list of their real names and respective internet pseudonyms;
5 b) provide the entire email-discussion thread or internet discussion thread containing the
6 posts which contain your insults;
7 c) provide the link where those quotations can be found on the internet.

8 **ANSWER:**

9 Yes, seriously. He expects me to collect 10 years' worth of data for
10 him. Not that it was proof of anything in a defamation case: Insulting
11 people isn't the same as defaming them. Did he plan to prove that I
12 caused each of these people in 10 years defamation damages?
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REQUEST FOR PRODUCTION NO. 69: 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. For all documentation you no longer
possess, provide the date it became inaccessible to you, all reasons why it became inaccessible,
each step you took to recover that information, the names, current residence addresses, current
phone numbers and current email addresses of all persons you contacted during such efforts, and
all reasons why those efforts were unsuccessful.

RESPONSE:

1 **INTERROGATORY NO. 70:** Provide the date and any and all reasons that your "tektonics"
2 forum at theologyweb.com ceased being accessible to the general public between June 7, 2015
3 and June 10, 2015. Identify the real-life name and any internet pseudonym used by each and
4 every person who communicated to you any information identifying the reason(s) this forum
5 ceased being accessible to the general public. Specify whether said tektonics forum went offline
6 *completely* or if it was merely made inaccessible to non-members.

7 **ANSWER:**

8 **REQUEST FOR PRODUCTION NO. 70:** 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. 71:** You label yourself as a bible-believing Christian. Do you
13 believe the words in Matthew 5:25-26 constitute relevant applicable legal authority in this case?

14 25 "Make friends quickly with your opponent at law while you are with him on the way, so that your opponent
15 may not hand you over to the judge, and the judge to the officer, and you be thrown into prison.

16 26 "Truly I say to you, you will not come out of there until you have paid up the last cent. (Mat 5:25-26 NAU)

17 If your answer is "yes", state with specificity why you have made no attempt in this litigation to
18 obey the "make friends" part in v. 25. If your answer was "no", explain why, and harmonize
19 your answer with your own commentary on Matthew 5:25 which indicates that the verse does
20 indeed apply to modern-day Christians. See <http://www.tektonics.org/TK-MTT.php>.

21 **ANSWER:**

22 **REQUEST FOR PRODUCTION NO. 71:** 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:**

Plaintiff's First
And Reque
To Defendant Jar

One of several "how do you interpret the Bible"
questions. My attorney answered by saying they were
irrelevant, which they are. Again ask yourself whether a
real attorney would ever pose this. Doscher said his
interrogatories were "comprehensive". The better words
would be: Unprofessional, harassing, annoying,
burdensome. The words used by my attorney and even
the judge later on.

Gre

INTERROGATORY NO. 72: State whether you agree or disagree with Evangelical scholar Craig Blomberg's below-quoted interpretation of Matthew 5:40. If you disagree, specify all of your reasons why:

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

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

If you desire that Plaintiff not indulge your assumption that the words of Jesus govern your conduct in this case with greater authority than the words of earthly legal authorities govern your conduct in this case, explain why.

ANSWER:

Again, one of several "Bible interpretation" questions Doscher asked. Entirely inappropriate for interrogatories.

REQUEST FOR PRODUCTION NO. 72: 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.

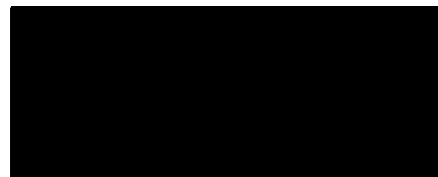
RESPONSE:

INTERROGATORY NO. 73: On June 7, 2015, at the website http://whatswrongwiththeworld.net/2015/04/the_apostles_and_the_resurrect_1.html, you assert that the person named in your IPA "has styled himself Celsus". You also state therein "His latest violation of his ban on Theologyweb, where he is currently posing as "Debunked". In the discussion topic "The significance of the Greek verb *ōphthē*, Paul's "vision", and the earliest beliefs", found at <http://christianchat.com/bible-discussion-forum/113038-significance-greek-verb-phthae-pauls-vision-earliest-beliefs.html>, you assert that Plaintiff is "has styled himself RagnarLothBrok". State with specificity:

- any and all reasons you have for believing that Plaintiff has ever "styled himself "Celsus" and "styled himself RagnarLothBrok"
- any and all reasons for believing that Plaintiff has ever posted to the internet under the pseudonym "Debunked".
- Provide all Internet protocol numbers showing from what IP address "Celsus", "Debunked" and "RagnarLothBrok" were posting from, including the IP addresses showing from where they signed up for membership at theologyweb.com.

If since June 7, 2015 you've come to believe Plaintiff did *not* post under one or more of those pseudonyms, then describe with specificity:

- the evidence that convinced you Plaintiff *wasn't* using them;
- why you missed, disregarded or misinterpreted that evidence in your original investigation, if any, and;



- 1 c) each step you took to make your change of mind known to the same public that you
intended to address in your postings linked above as well as in your IPA;
2 d) all posting-dates and other website addresses, if any, where you attempted to make such
change of mind known.

3 **ANSWER:**

4

5

6 **REQUEST FOR PRODUCTION NO. 73:** 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
7 support your answer to the preceding Interrogatory. Provide all IP addresses for all posts,
including the signing up for membership post, which the theologyweb.com tracking software
8 associates with the comments posted by Celsus, Debunked, and RagnarLothbrok.

9 **RESPONSE:**

10

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12 **INTERROGATORY NO. 74:** Do you have knowledge about any theologyweb.com member
asserting that Plaintiff was a convicted murderer? If so, state the content of that knowledge and
13 how you obtained it.

14 **ANSWER:**

15

16 **REQUEST FOR PRODUCTION NO. 74:** 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
17 support your answer to the preceding Interrogatory.

18 **RESPONSE:**

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20 **INTERROGATORY NO. 75:** Do you believe Plaintiff, at any time since August 1, 2013, has
done anything that would justify your filing a lawsuit against him? If your answer is "yes",
21 specify all actions and words of Plaintiff you believe would justify your filing a lawsuit against
him. Give evidentiary facts, not ultimate facts.

22 **ANSWER:**

23

24 **REQUEST FOR PRODUCTION NO. 75:** 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
25 support your answer to the preceding Interrogatory.

RESPONSE:

1 **INTERROGATORY NO. 76:** State with specificity each and every reason you had for
2 refusing to file a police report due to any illegal conduct you alleged Plaintiff to be engaging in.
3 If you have ever filed a police report on Plaintiff, specify the name of the officer who took the
4 report, the report number, and the address and phone number of the law-enforcement agency
5 where the report is now filed.

6 **ANSWER:**

7 **REQUEST FOR PRODUCTION NO. 76:** 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. 77:** State with specificity the exact federal, state and local law(s)
12 that you believed Plaintiff was violating, when you asserted in your July 7, 2015 post # 102 to
13 the skepticbud thread that you might call Plaintiff's "local police". If you meant [REDACTED]
14 cyberstalking law, [REDACTED] explain with specificity all your reasons for believing that
15 Plaintiff used any lewd, lascivious, indecent, or obscene words, images, or language, or
16 suggested the commission of any lewd or lascivious act. If you meant Florida's cyberstalking
17 law Fl. St. § 784.048(1)(d), explain with specificity all 'substantial emotional distress' you
18 endured as a result of Plaintiff's alleged cyberstalking. Specify all evidentiary facts, not ultimate
19 facts, upon which you depended to justify your view that Plaintiff's alleged words and conduct
20 were criminal in nature. If you meant any other law, provide evidentiary facts that convinced
21 you that the conduct of the stalker and the victim fulfilled all elements of the crime described in
22 said law.

23 **ANSWER:**

1 **REQUEST FOR PRODUCTION NO. 77:** 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. 78:** For all lawsuits filed by Plaintiff which you publicly stated
7 were frivolous, with the exception of the Swift lawsuit, had you familiarized yourself with all the
8 facts alleged by all parties in the pre-dismissal briefing filed with the Court thereto, *before* you
9 first began to publicly declare them frivolous, yes or no? If your answer is "no", state with
10 specificity each and every document in those lawsuits that you had read before publicly declaring
11 those suits frivolous.

12 **REQUEST FOR PRODUCTION NO. 78:** 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 you
14 familiarized yourself with before publicly declaring those lawsuits frivolous.

15 **RESPONSE:**

16 **INTERROGATORY NO. 79:** Describe with specificity each and every document you read in
17 Plaintiff's lawsuit and appeal against Swift, before you first declared that case to be frivolous.

18 **REQUEST FOR PRODUCTION NO. 79:** Provide a true and correct copy of any and all
19 documents which you currently have access to, or which you are capable of obtaining, which
20 support your answer to the preceding Interrogatory.

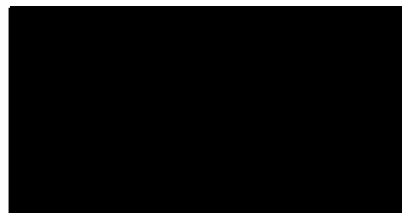
21 **RESPONSE:**

22 **INTERROGATORY NO. 80:** Had you conducted an investigation into Plaintiff's lawsuit
23 against Swift, *before* you publicly declared that case to be frivolous? If your answer is "yes",
24 describe in detail each fact and legal position argued in both Plaintiff's summary judgment
25 briefing and in his subsequent 9th Circuit appeal briefing, which you believed were *not* frivolous,
if any.

REQUEST FOR PRODUCTION NO. 80: 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:

Plaintiff's First Set Of Interrogatories
And Requests For Production
To Defendant James Patrick Holding - 58



1 **INTERROGATORY NO. 81:** For every factual assertion and legal argument in Plaintiff's
2 lawsuit against Swift, which your answer to the preceding Interrogatory admitted were *non-*
3 frivolous, explain with specificity why you refrained from mentioning in both your IPA and in
4 the skepticbud thread, these *non-frivolous* facts and legal arguments by Plaintiff.

5 **REQUEST FOR PRODUCTION NO. 81:** Provide a true and correct copy of any and all
6 documents which you currently have access to, or which you are capable of obtaining, which
7 support your answer to the preceding Interrogatory.

8 **RESPONSE:**

9 **INTERROGATORY NO. 82:** Did you, at any time between June 1, 2015 and the date you
10 mail your discovery answers herein back to Plaintiff, either know or suspect that your accusation
11 of the Swift lawsuit being frivolous, was error? If your answer is "yes", state with specificity all
12 facts which caused you to either know or suspect that your accusation of Plaintiff's Swift -
13 lawsuit being frivolous was error or might have been error, the date you first discovered such
14 facts, and the sources you received such facts from, and specify what actions you took to make
15 sure anybody reading your IPA and your posts in the skepticbud thread became aware of said
16 change of mind.

17 **ANSWER:**

18 **REQUEST FOR PRODUCTION NO. 82:** Provide a true and correct copy of any and all
19 documents which you currently have access to, or which you are capable of obtaining, which
20 support your answer to the preceding Interrogatory.

21 **RESPONSE:**

22 **INTERROGATORY NO. 83:** In your post # 97 at the skepticbud thread, you assert as
23 follows:

24 *Quote Originally Posted by Sparko View Post*
25 *Pretty much all it would take to stop a frivolous suit like bud is threatening is a motion to dismiss.*
I figured as much myself.
His lawsuit against his former employer (Swift) was pretty much top to bottom taken care of that way.
Yankovic's song is intended as a joke, but
Bud is literally threatening to sue Colorado because it looks like Wyoming.
Somehow he has the idea that the legal system is intended to resolve his personal conflicts;
or else he thinks it's like a personal lottery from which he might get a lucky win.

Plaintiff's First Set Of Interrogatories
And Requests For Production
To Defendant James Patrick Holding - 59