

Based on his recent messages, he plans to sue because he wanted to be able to keep his identity "private" while he did to others what he's so upset I did to him.
Using publicly available records.
He files suits like a 2 year old.

Little did I know at this time that one of the characteristics of people with borderline disorder IS that they have the emotional maturity of a 2 year old.

Describe with specificity:

- a) What court document you were relying on as your factual basis for asserting that Plaintiff's lawsuit against Swift was "pretty much top to bottom taken care of" by a 'motion to dismiss';
- b) Any and all reasons why you liken the alleged frivolity of Plaintiff's threatened lawsuit against you, with the monstrously absurd frivolity involved in 'suing Colorado because it looks like Wyoming'.
- c) Any and all of "his messages" which evinced a desire on Plaintiff's part to "sue because he wanted to be able to keep his identity "private"";
- d) Whether you intended the entire above-quoted post or any part of your words therein to persuade other theologyweb readers or member to view Plaintiff with any type or degree of hatred, distrust, contempt or disgrace;

Provide every document, pleading, motion and responding brief within each and every "suits" (plural) that you believe Plaintiff filed "like a 2 year old".

If you have come across any evidence persuading you that any of Plaintiff's lawsuits were not frivolous, describe:

- a) that evidence with specificity;
- b) any and all reasons why you think said evidence shows the lawsuits weren't frivolous;
- c) any and all reasons why you missed, disregarded or misinterpreted that evidence in your original investigation, if any, and;
- d) what efforts you made, if any, since changing your mind about the alleged frivolity of Plaintiff's lawsuits, to notify your readers and the general public of said change of mind.
- e) all reasons why you did not publicly declare your change of mind in the same document or website where your original position on the matter was found.

ANSWER:

REQUEST FOR PRODUCTION NO. 83: Provide each and every document contained within each and every court file representing each and every one of Plaintiff's "lawsuits" (plural) that you publicly accused him of filing or litigating in frivolous fashion.

RESPONSE:

1 **INTERROGATORY NO. 84:** Give all court case titles and document numbers you relied on
2 to justify stating in your Post # 91 of the skepticbud thread that Plaintiff is a "a frivolous
3 litigator".

4 **ANSWER:**

5 **REQUEST FOR PRODUCTION NO. 84:** Provide a true unabridged full copy of any court
6 documents you identified in answer to the preceding Interrogatory. Where the document
7 represents only part of a court ruling, party pleading or party motion, provide the entire order,
8 pleading or motion and highlight the assertions or arguments therein which you refer to.

9 **RESPONSE:**

10 **INTERROGATORY NO. 85:** On July 5, 2015, Plaintiff sent you an email, and therein
11 Plaintiff replied as follows to your accusation that his lawsuit against Swift Transportation was
12 frivolous:

13 As an example, I worked for Swift trucking in 2007, they sent me to shippers that did not have a truck scale.
14 Unfortunately, the truck itself doesn't have a scale on it, and the law against overweight trucks starts applying
15 immediately outside the exit gates of the shipper. When I received one too many overweight tickets because of
16 this, along with my employer telling me bluntly to drive illegally, I quit and sued for wrongful constructive
17 discharge. Although there is plenty of proof in the record that my boss told me to drive illegally, the only thing
18 that came out in the court opinion was that the law regulating truck weight does not require the employer to
19 provide me with a way to scale my load before driving on a public road. Before I quit, I endured emotional
20 distress in driving such unscaled loads, since there was no way to ensure they were of legal weight before
21 reaching the shipper 10 or more miles down the road, and an illegally overweight load is a safety risk to the
22 driver and other traffic. Holding, knowing none of these details because of his shoddy research (the briefing of
23 litigants is available to anybody for a small charge) and his willingness to believe the first thing he sees, did not
24 ask me about any of this, and simply asserts in knee-jerk fashion that Swift's refusal to send me only to shippers
25 who had truck scales onsite is ridiculous, <http://www.tektonics.org/skepticbud.htm> when in fact employers
requiring employees to act in illegal fashion is the very definition of the wrongful-constructive discharge
exception to the at-will employment doctrine.

26 However, two days later on July 7, 2015, you posted to the skepticbud thread your most extreme
27 negative comment about the frivolity of the Swift lawsuit, as follows:

28 I figured as much myself. His lawsuit against his former employer (Swift) was pretty much top to bottom
29 taken care of that way. Yankovic's song is intended as a joke, but Bud is literally threatening to sue Colorado
30 because it looks like Wyoming. Somehow he has the idea that the legal system is intended to resolve his
31 personal conflicts; or else he thinks it's like a personal lottery from which he might get a lucky win.
32 Based on his recent messages, he plans to sue because he wanted to be able to keep his identity "private" while
33 he did to others what he's so upset I did to him. Using publicly available records. He files suits like a 2 year old.

34 Describe with specificity all of your reasons for continuing to call Plaintiff's Swift lawsuit
35 frivolous despite being previously informed by Plaintiff that the basis for his wrongful
constructive discharge claim therein was *Swift's having explicitly demanded that he drive*
illegally. Specify also whether you did any further research into the Swift case between July 5,
2015 and July 7, 2015, and whether you currently believe Plaintiff's lawsuit against Swift was

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1 advanced without reasonable legal basis. Although legal conclusions are not generally
2 discoverable, Plaintiff has characterized your legal opinion that his lawsuit is frivolous, as the
3 tort of libel, and therefore, since your legal opinion on that matter is the factual basis for the tort
4 claim, then it, like the basis of any tort claim, is a properly discoverable evidentiary 'fact' in this
5 case.

6 **ANSWER:**

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8 **REQUEST FOR PRODUCTION NO. 85:** 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:**

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13 **INTERROGATORY NO. 86:** Describe in detail what exact factual allegations either party
14 made in the briefing for *Doscher v. Swift, Case No. 3:10-cv-05545-RBL*, that you familiarized
15 yourself with *before* first publicly stating that said Swift lawsuit was frivolous. Do not describe
16 facts in said briefing that you did *not* familiarize yourself with before first publicly stating that
17 said Swift lawsuit was frivolous.


18 **REQUEST FOR PRODUCTION NO. 86:** Provide a true and correct copy of any and all
19 documents filed in *Doscher v. Swift, Case No. 3:10-cv-05545-RBL*.

20 **RESPONSE:**

21 Yes, Doscher is asking ME to provide a copy of documents
22 from one of HIS own lawsuits.

23
24 **INTERROGATORY NO. 87:** Describe in detail what exact factual allegations either party
25 made in the briefing for *Doscher v. Swift, No. 11-35192* [REDACTED] which you familiarized
yourself with *before* you first publicly stated that said Swift case was frivolous. Do not describe
facts in said briefing that you did *not* familiarize yourself with before first publicly stating that
said Swift lawsuit was frivolous.

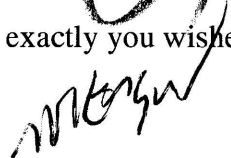
1 **REQUEST FOR PRODUCTION NO. 87:** Provide a true and correct copy of any and all
2 documents filed in *Doscher v. Swift, No. 11-35192* [REDACTED]
3 **RESPONSE:**
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5 **INTERROGATORY NO. 88:** Did Gary Habermas, Daniel Wallace, Craig Blomberg, or
6 apologist James Taylor ever communicate to you, or did you communicate to any of these men,
7 any fact or opinion about Plaintiff? If your answer is "yes", give the name of the scholar, and the
8 full content and any and all discussions you had with them in which said alleged facts or
9 opinions were disclosed. Where the discussions took place in a manner involving posting typed
10 words to the internet, or by email or by U.S. postal mail, provide a full unabridged unedited copy
11 of those documents, emails and discussion threads.
12 **ANSWER:** 

13 **REQUEST FOR PRODUCTION NO. 88:** 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.
16 **RESPONSE:**
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18 **INTERROGATORY NO. 89:** In your July 6, 2015 email reply to Plaintiff, entitled "Re:
19 Settlement effort in the matter of *Doscher v. Holding*", you say:
20

21 YAWN 

22 Describe with specificity what exactly you wished Plaintiff to believe based on your "YAWN"
23 reply.
24 **ANSWER:** 

25 **REQUEST FOR PRODUCTION NO. 89:** 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:

We never had any such exchange about 1 Kings 22.

INTERROGATORY NO. 90: During one of your debates with Plaintiff in 2015, Plaintiff brought up the account in 1st Kings 22:19-23 as a contradiction to unequivocal statements in the New Testament that God cannot lie. One of your responses to this was that there is such a thing as a "noble lie". In your sincere opinion, is there a real possibility, even if not a probability, that your god could instruct you to tell a 'noble lie'? If your answer is "no", specify all reasons for your belief that your god would never command you to tell a "noble lie". Your propensity as a witness for truth or falsity is directly relevant to your credibility, and for obvious reasons, your sincerely held spiritual beliefs are what give rise to your motives to lie or tell the truth. The issue is not whether your spiritual beliefs are true, but whether what you believe makes you prone to approving of deception where expediency dictates.

ANSWER:

REQUEST FOR PRODUCTION NO. 90: 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. 91: Is it your sincerely held spiritual belief that modern-day critics who publicly criticize Christianity deserve to be publicly named?

ANSWER:

REQUEST FOR PRODUCTION NO. 91: 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. 92: Would it be fair to classify you as the Ann Coulter of christian apologetics?

ANSWER:

REQUEST FOR PRODUCTION NO. 92: 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:

My attorney highlighted this for the court as an example of an improperly harassing interrogatory. It was a great example. I found someone calling me the "Ann Coulter of apologetics" sometime around 2003. I thought it was funny and made public note of it. But I stopped using the phrase a few years later and it is nowhere on my websites except in a 2007 email I quote from someone else. Doscher is STILL fixated on this over a decade later.

INTERROGATORY NO. 93: Do you have a sincere belief that genuinely supernatural miracles have occurred anywhere on Earth at any time since January 1, 1800? This is directly relevant to your ability to research matters thoroughly, since whether you can do so is directly at issue in this lawsuit. If your answer is "yes", describe with specificity

- a) the date and place of each such alleged miracle;
- b) the nature of each such miraculous occurrence (restoration of missing limbs, causing the earth to stop spinning, people fainting at a tent revival, snakes talking, out of body experiences, etc);
- c) the names of the primary witnesses to it whose testimony you deem reliable;
- d) why you deem their testimony reliable;
- e) why you deem the *record* of their testimony as trustworthy;
- f) the physical evidence, if any, that convinced you the phenomena was genuinely supernatural;
- g) the reason why you think any non-supernatural explanation is not plausible;
- h) the sources upon which you draw for your information (titles, authors and dates of any books, newspaper articles, and the like).

Exclude from your answer any miracles you believe were done by unholy power.

ANSWER:

Seriously? I'd ask Doscher what serious attorney would pose such questions, but I think he'd just say all the attorneys out there are incompetent for NOT posing questions like these.

REQUEST FOR PRODUCTION NO. 93: 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. 94: State the exact date on which you first anticipated litigation from Plaintiff.

ANSWER:

REQUEST FOR PRODUCTION NO. 94: 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. 95:** How many words of Jesus Christ do you believe have any
2 relevance to your responsiveness to discovery in this lawsuit? Quote the words in their entirety,
3 and the biblical books, chapters, and verses they are sourced in. If you say "none", explain why
4 you think Jesus ceases being Lord whenever you are under oath.

5 **ANSWER:**

6 **REQUEST FOR PRODUCTION NO. 95:** 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. 96:** For all of Plaintiff's Requests for Admission, which you
11 answered with "denied", state with specificity all *evidentiary* facts, not *ultimate* facts, which you
12 intend to use to support each such denial.

13 **ANSWER:**

There were no "requests for admission" in
any of that.

14 **REQUEST FOR PRODUCTION NO. 96:** 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. 97:** List every legal authority which governed your actions at the
19 time you were posting/emailing facts and opinions about Plaintiff to other persons (i.e., the
20 alleged facts and opinions from you which now appear in Plaintiff's First Amended Complaint).

21 **ANSWER:**

22 **REQUEST FOR PRODUCTION NO. 97:** 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 **REQUEST FOR PRODUCTION NO. 98:** Provide a true and correct copy of the entirety of
2 any discussion thread or email discussion containing the individual emails and posts mentioned
3 in the First Amended Complaint.

4 **RESPONSE:**

5 Dated this 6th day of August ~~July~~ 2015

6 
Christian Doscher

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8 Altogether, answering these requests cost me \$2500 of the total bill. My
9 attorney did a great job of cutting costs and advising me on why I didn't
10 have to bend over backwards for these, but it's still an example of why
11 pro se litigants like Doscher need to be reined in, and also why the
12 discovery process has become so abusive and burdensome. Many
13 courts limit the number of interrogatories, including federal courts. His
14 home court system badly needs to do the same.
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