

RESPONSE: No objection.

n. ***Pirates of the Caribbean Films.*** The phrase “Pirates of the Caribbean Films” collectively refers to the films “Pirates of the Caribbean: The Curse of the Black Pearl,” “Pirates of the Caribbean: Dead Man’s Chest,” “Pirates of the Caribbean: At World’s End,” “Pirates of the Caribbean: On Stranger Tides,” and “Pirates of the Caribbean: Dead Men Tell No Tales.”

RESPONSE: Plaintiff objects to this definition on the basis that it is overly broad and unduly burdensome and implicates significant privacy, privilege, and other interests of Plaintiff and third parties. Plaintiff further objects to this definition as vague and ambiguous.

o. ***Fantastic Beasts Films.*** The phrase “Fantastic Beasts Films” collectively refers to the films “Fantastic Beasts and Where to Find Them,” “Fantastic Beasts: The Crimes of Grindelwald,” and the tentatively titled “Fantastic Beasts and Where to Find Them 3,” along with any other future film in this series referred to in any contract such as Fantastic Beasts and Where to Find Them 4 and Fantastic Beasts and Where to Find Them 5.

RESPONSE: Plaintiff objects to this definition on the basis that it is overly broad and unduly burdensome and implicates significant privacy, privilege, and other interests of Plaintiff and third parties. Plaintiff further objects to this definition as vague and ambiguous.

p. ***Disney.*** The phrase “Disney” refers to the Walt Disney Company and any of its divisions, parents, subsidiaries, related or affiliated companies or organizations.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, to the extent that it is inclusive of “any” divisions, parents, subsidiaries, related or affiliated companies or organizations.”

REQUESTS

1. Please produce all contracts or other communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in any of the Pirates of the Caribbean Films.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, taking into account the needs of the case, including as to the Request's unreasonably open-ended demand for "communications reflecting or otherwise relating to" and "obligations, plans, issues, complaints, concerns, termination, and compensation," and as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous, including but not limited to the terms "obligations, plans, issues, complaints, concerns, termination, and compensation." Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds that it seeks documents over a two-decade period that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought, and is ambiguous to the point of unintelligibility.

Subject to and without waiver of the forgoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the Pirates of the Caribbean films.

2. To the extent not responsive to Request No. 1, please produce all contracts or other agreements of any nature between Mr. Depp and Disney related to role(s) or potential role(s) in any film produced, financed, or released by Disney.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

Plaintiff will not produce any documents in response to this Request.

3. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp's role(s) in the film "The Lone Ranger."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome as to both time and scope, taking into account the needs of the case, including because of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation." Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

4. Please produce all contracts and communications reflecting, or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp's role(s) in the film "Mortdecai."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case, as to both time and scope. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or

otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

5. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the film “Black Mass.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and

vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

6. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the film “Alice Through the Looking Glass.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome, as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it

fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

7. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination, and compensation to/for Mr. Depp’s role(s) in the “Fantastic Beasts Films.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome as to both time and scope, taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the

discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

8. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Murder on the Orient Express.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks

documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

9. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “City of Lies.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it

is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

10. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “The Professor.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable

privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

11. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Waiting for the Barbarians.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

12. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) in the film “Minamata.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession,

custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language “reflecting or otherwise relating to” any “obligations, plans, issues, complaints, concerns, termination, and compensation.”

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question.

13. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp’s role(s) or tentative role(s) in the film tentatively titled “Beetlejuice 2.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects

to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the film in question, if any.

14. Please produce all contracts and communications reflecting or otherwise relating to any obligations, plans, issues, complaints, concerns, termination and compensation to/for Mr. Depp's role(s) or tentative role(s) in the television series "Puffins."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further

objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought and is both overbroad and vague to the point of unintelligibility, including because of its use of the language "reflecting or otherwise relating to" any "obligations, plans, issues, complaints, concerns, termination, and compensation."

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced documents sufficient to show his compensation from the series in question.

15. Please produce all communications between Mr. Depp and any of his agents, managers, or other talent or commercial representatives referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks

confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

16. Please produce all communications between Mr. Depp (including any of his agents, managers, or other talent or commercial representatives) and any film studio, production company, marketing company, or advertising agency referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

17. Please produce all documents referring to, reflecting, or otherwise relating to Mr. Depp being considered for any roles in films, commercials, tv series, or other promotional or marketing opportunities (including billboards, magazines, or other print or digital advertisements or marketing means) that Mr. Depp either did not receive or chose not to accept for any reason from December 18, 2018 to the present.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it fails to reasonably particularize the categories of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search.

18. Please produce documents sufficient to identify all of Mr. Depp's donations to any charitable organizations from January 1, 2016 to the present, including any documents referring to any time given or donated by Mr. Depp to any charitable organizations even if no monetary donation was involved.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents

that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody or control. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request as harassing because it seeks information unrelated to the subject matter of this case. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence and is patently overbroad, harassing, and intrusive. Although Defendant put her own charitable donations at issue by falsely representing that she had donated the entirety of her divorce settlement money and citing those supposed donations as evidence of her motives in this action, Plaintiff's charitable donations are not at issue in this case.

Plaintiff will not produce any documents in response to this Request.

19. Please produce all documents supporting, refuting, or otherwise relating to Your First Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

20. Please produce all documents supporting, refuting, or otherwise relating to Your Second Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

21. Please produce all documents supporting, refuting, or otherwise relating to Your Third Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any

other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

22. Please produce all documents supporting, refuting, or otherwise relating to Your Fourth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the

impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects to this Request on the grounds that it seeks information already known to Defendant and alleged in Plaintiff’s Complaint, and on the further grounds that the statements in question speak for themselves. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith. However, Plaintiff specifically asserts, and does not waive, the attorney-privilege and work-product doctrine, including with respect to communications with Adam Waldman, and will not produce documents covered by those privileges in response to this Request.

23. Please produce all documents supporting, refuting, or otherwise relating to Your Fifth Defense, including any documents supporting, refuting, or otherwise relating to Your statements of any “lack of direction as to the subject statements, lack of direction or control of a third party as to the subject statements, a third-party’s exceeding the scope of employment or agency relationship as to the subject statements, and statements made by an independent contractor.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to the extent that this Request seeks the production of documents to prove a negative. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith. However, Plaintiff specifically asserts, and does not waive, the attorney-privilege and work-product doctrine, including with respect to communications with Adam Waldman, and will not produce documents covered by those privileges in response to this Request.

24. Please produce all documents supporting, refuting, or otherwise relating to Your Sixth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

25. Please produce all documents supporting, refuting, or otherwise relating to Your Seventh Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any

other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

26. Please produce all documents supporting, refuting, or otherwise relating to Your Eighth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that

it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

27. Please produce all documents supporting, refuting, or otherwise relating to Your Ninth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects that this Request fails to reasonably particularize the category of documents sought.

Subject to and without waiver of the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

28. Please produce all documents supporting, refuting, or otherwise relating to Your Tenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection.

Without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

29. Please produce all documents supporting, refuting, or otherwise relating to Your Eleventh Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it calls for a legal conclusion. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff further objects to this

Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it seeks documents protected by the attorney-client privilege, work-product doctrine, and/or any other applicable privilege, immunity, or protection.

Subject to and without waiver of the foregoing objections, Plaintiff will produce non-privileged documents responsive to this Request, if any, following a reasonable search.

30. Please produce all documents supporting, refuting, or otherwise relating to Your Twelfth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it is vague and ambiguous. Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any other applicable privilege or immunity. Plaintiff further objects on the grounds that this request fails to describe the documents sought with any reasonable level of particularity.

Subject to and without waiver of the foregoing objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

31. Please produce all documents supporting, refuting, or otherwise relating to Your Thirteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it implicates any

other applicable privilege or immunity. Plaintiff further objects on the grounds that this request is overbroad to the point of incoherence as phrased, and fails to describe the documents sought with any reasonable level of particularity. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings.

Without waiving the above-stated objections, Plaintiff does not have any responsive, non-privileged documents within his possession, custody, or control, as this affirmative defense is merely a reservation of rights.

32. Please produce all documents supporting, refuting, or otherwise relating to Your Fourteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not

reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request to the extent it misrepresents Plaintiff's pleadings and is vague and ambiguous, as there is no fourteenth affirmative defense in Plaintiff's operative Answer.

Plaintiff will not produce any documents in response to this Request, as Plaintiff has not at this time asserted a fourteenth affirmative defense.

33. Please produce all documents supporting, refuting, or otherwise relating to Your Fifteenth Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request to the extent it misrepresents Plaintiff's pleadings. Plaintiff further objects that this Request is vague and ambiguous and misstates the content of Plaintiff's Answer, which does not at this time assert a fifteenth affirmative defense.

Plaintiff will not produce any documents in response to this Request, as Plaintiff has not at this time asserted a fifteenth affirmative defense.

34. Please produce all documents supporting, refuting, or otherwise relating to Your denial of Counterclaim Plaintiff's Prayer for Relief as contained on page 25 of Your Answer and Grounds of Defense.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings.

Subject to and without waiving the above-stated objections, Plaintiff will produce responsive, non-privileged documents within his possession, custody, or control (if any) that can be located after a reasonable search conducted in good faith.

35. Please produce all documents supporting, refuting, or otherwise relating to Your denials or partial denials of any of the paragraphs or allegations in the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular

allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it lacks any degree of particularity.

Plaintiff will not produce any documents in response to this Request as posed. Plaintiff is willing to respond to more particularized requests that seek documents relevant to the existing claims and defenses.

36. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 1 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of

counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced non-privileged documents responsive to this Request, to the extent that such documents are relevant to the claims and defenses in this case as framed by the surviving pleadings.

37. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 4 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

38. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 5 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the

parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiver of the foregoing objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control.

39. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 6 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects

to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the

Counterclaim that have survived Plaintiff's pleading challenges. Plaintiff will not produce documents in response to this Request.

40. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 7 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff

further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges. Plaintiff will not produce documents in response to this Request.

41. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 8 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other

sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

42. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 9 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks

documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges. Plaintiff will not produce documents in response to this Request.

43. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 10 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks

confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations.

Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

44. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 11 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this Request on the grounds that it seeks confidential, proprietary, and private personal and/or business information of Plaintiff and/or third parties to this litigation, which is not subject to discovery in this action. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this request on the grounds that it is lacking in reasonable particularity. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds

that it is duplicative of other discovery and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

45. Please produce all documents supporting, refuting, or otherwise relating to Your statement in response to ¶ 11 of the Counterclaim that “Counterclaim Defendant admits that Mr. Waldman may have public associations with one or more persons of Russian origin.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative.

Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

46. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 12 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or

entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

47. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶¶ 13-14 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to

which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

48. Plaintiff will not produce documents in response to this Request. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 15 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

49. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 16 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine,

including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

50. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 17 of the Counterclaim, including your statement that “specifically denied Counterclaim Plaintiff’s characterization of the same.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents

protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in

response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

51. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 18 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and

ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

52. Please produce all documents supporting, refuting, or otherwise relating to Your statement that “denies any mischaracterization of” the facts stated in ¶ 19 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the

needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

53. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 20 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further

objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

54. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 21 of the Counterclaim, including your denial of "Counterclaim Plaintiff's characterization of Counterclaim Defendant's statements as a threat or threats.""]

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and

overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

55. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 22 of the Counterclaim, including your denial of “Counterclaim Plaintiff’s characterization of Counterclaim Defendant’s statements as a threat or threats.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this

Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

56. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 24 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of

counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

57. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 25 of the Counterclaim, including your denial of the statement that “public opinion has never rewarded a woman for telling her story of surviving domestic abuse or violence.”

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive.

Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

58. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 26 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations.

Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

59. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 27 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is

overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

60. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 28 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

61. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Adam Waldman has had communications with witnesses” in response to ¶ 29 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

62. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 29 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce documents in response to this Request.

63. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Mr. Waldman has released one or more declarations in the public sphere” in response to ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

64. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Mr. Waldman has publicly commented about this litigation” in response to ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable

privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

65. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 30 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce documents in response to this Request.

66. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 31 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

67. Please produce all documents supporting, refuting, or otherwise relating to Your statement “Counterclaim Defendant admits that his first video message on Instagram made reference to Counterclaim Plaintiff and this lawsuit” in response to ¶ 32 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff’s possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or

otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

68. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 32 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that

responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. The Request seeks all communications from any person or entity, regardless of whether such communications were even with Plaintiff. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

69. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 37 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to

concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control, if any, regarding the op-ed at issue in the above-captioned action.

70. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 38 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further

objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff has already produced and/or will produce responsive, non-privileged documents, if any, regarding the op-ed at issue in the above-captioned action.

71. Please produce all documents supporting, refuting, or otherwise relating to Your statement “specifically denies any suggestion that the op-ed was not intended and widely understood to refer to Counterclaim Defendant” in response to ¶ 39 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to

this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) regarding the op-ed at issue in the above-captioned action.

72. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 39 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the

court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents, if any, regarding the op-ed at issue in the above-captioned action.

73. Please produce all documents supporting, refuting, or otherwise relating to Your partial denial of ¶ 40 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a

negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the above-stated objections, Plaintiff will produce and/or has already produced responsive, non-privileged documents within his possession, custody, or control (if any) regarding the op-ed at issue in the above-captioned action.

74. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 41 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the

attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response

to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

75. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 45 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including

because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

76. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 46 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and

ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and

Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

77. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 47 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request

on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

78. Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman,

and undertakes no obligation to produce such documents. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 48 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates

the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

79. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 49 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably

calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal

conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

80. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 50 of the Counterclaim, including your denial of the allegation that "the date of the picture" was "false and defamatory."

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are

obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request on the grounds that it seeks discovery for claims already dismissed by the court in this Action. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of

Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff's possession, custody, or control, if any, that are relevant to the parties' claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

81. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 51 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request

on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language “supporting, refuting, or otherwise relating to.” Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Plaintiff will not produce any documents in response to this Request.

82. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 52 of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this request to the extent that it calls for a legal conclusion. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents

specifically “support, refute, or otherwise relate” to particular allegations in the parties’ pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant’s Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant to Defendant’s First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court’s granting, in part, of Plaintiff’s Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff’s pleading challenges.

Subject to and without waiving the foregoing objections, Plaintiff will search for and produce non-privileged documents, if any, within Plaintiff’s possession, custody, or control, if any, that are relevant to the parties’ claims and defenses as framed by the existing pleadings. Plaintiff specifically asserts the attorney-client privilege and work product doctrine as to communications and other documents regarding Adam Waldman, and undertakes no obligation to produce such documents.

83. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 66(d)-(f) of the Counterclaim.

RESPONSE:

Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this

Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to this Request on the grounds and to the extent that it seeks documents protected by the attorney-client privilege, work-product doctrine, or any other applicable privilege, immunity, or protection. Plaintiff further objects that this Request is overbroad and ambiguous, including because of its use of the language "supporting, refuting, or otherwise relating to." Plaintiff further objects to this Request on the grounds that it implicates the work product doctrine, including to the extent that it seeks to intrude on the impressions and analysis of counsel as to which documents specifically "support, refute, or otherwise relate" to particular allegations in the parties' pleadings. Plaintiff further objects to this Request on the grounds that it assumes facts and/or seeks documents evidencing a negative. Plaintiff further objects to this Request to the extent that it relates to mere statements of opinion and/or legal conclusions asserted in Defendant's Counterclaim, as opposed to concrete factual allegations. Plaintiff further objects to this Request on the grounds and to the extent that it amounts to a demand for documents relevant

to Defendant's First Counterclaim, Third Claim, and/or portions of Second Claim that are no longer at issue in this case following the Court's granting, in part, of Plaintiff's Demurrer and Plea in Bar. Plaintiff specifically declines to undertake any obligation to produce documents in response to open-ended requests that are not directly related to the limited portions of the Counterclaim that have survived Plaintiff's pleading challenges.

Plaintiff will not produce any documents in response to this Request.

84. Please produce all documents supporting, refuting, or otherwise relating to Your denial of ¶ 67 of the Counterclaim.

RESPONSE:

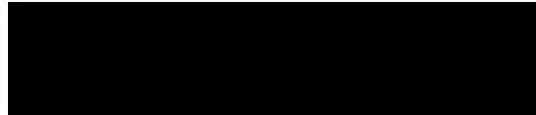
Plaintiff repeats and incorporates by this reference the General Objections and Objections to Definitions and Instruction above, as though set forth in full. Plaintiff further objects to this Request on the grounds that it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this Request on the grounds that it is overly broad and unduly burdensome taking into account the needs of the case. Plaintiff further objects to this request on the grounds that it is vague and ambiguous. Plaintiff further objects to this Request on the grounds that responsive documents are obtainable from other sources that are more convenient, less burdensome, and less expensive. Plaintiff further objects to this Request to the extent that it seeks documents protected by the attorney-client privilege, work product doctrine, and/or any other applicable privilege, immunity, or protection. Plaintiff further objects to this Request on the grounds that it seeks documents that are not within Plaintiff's possession, custody, or control. Plaintiff further objects to this request on the grounds that it is not reasonably tailored to the claims and defenses in this case and is harassing and overbroad. Plaintiff further objects to this request on the grounds that it is duplicative of other discovery requests and is needlessly cumulative. Plaintiff further objects to

CERTIFICATE OF SERVICE

I hereby certify that on this 16th day of February 2021, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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Benjamin G. Chew