

contact between any part of Your body and another person's genitalia, anus, groin, breast, inner thigh, or buttocks; or (b) direct contact between any part of a third party's body and Your genitalia, anus, groin, breast, inner thigh, or buttocks.

RESPONSE: Plaintiff objects to this definition as overly broad and unduly burdensome, vague and ambiguous to the extent it seeks to impose burdens beyond those required by the Rules. This term is overly broad in its ten year scope, and vague and ambiguous in its use of the terms "direct contact" and "sexual manner." Plaintiff further objects to this term to the extent that it is inflammatory and harassing, assumes facts not in evidence, lacks foundation, calls for a medical and/or legal conclusion and seeks information unrelated to this case and that is unlikely to lead to the discovery of admissible evidence. Plaintiff will agree to meet and confer with Defendant regarding this term.

t. ***You and/or Your.*** The terms "You" and/or "Your" refer to the recipient(s) of these discovery requests, as well as all persons and entities over which said recipient has "control" as understood by the Rules of this Court.

RESPONSE: No objection.

REQUESTS FOR ADMISSION

1. Please admit that the document produced as DEPP19191 and attached as **Exh. 1** is a true, genuine, and authentic copy of a December 14, 2012 email exchange between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information

protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19191 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

2. Please admit that the document produced as DEPP19194-19196 and attached as **Exh. 2** is a true, genuine, and authentic copy of May 23, 2013 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19194-19196 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general

and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

3. Please admit that the document produced as DEPP19207-19208 and attached as **Exh. 3** is a true, genuine, and authentic copy of December 29, 2013 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19207-19208

appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

4. Please admit that the document produced as DEPP19209 and attached as **Exh. 4** is a true, genuine, and authentic copy of a September 2, 2015 email between Tracey Jacobs, Christi Dembrowski, and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this

communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19209 appears to be a copy of an email between Tracey Jacobs, Christi Dembrowski, and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

5. Please admit that the document produced as DEPP19210 and attached as **Exh. 5** is a true, genuine, and authentic copy of an October 23, 2015 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19210 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general

and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

6. Please admit that the document produced as DEPP19211 and attached as **Exh. 6** is a true, genuine, and authentic copy of November 14, 2015 emails between Andrew Thau, Raul Anaya, Tracey Jacobs, Joel Mandel, and the email address danny@bhdl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19211 appears to

be a copy of an email between Andrew Thau, Raul Anaya, Tracey Jacobs, Joel Mandel, and the email address danny@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

7. Please admit that the document produced as DEPP19213 and attached as **Exh. 7** is a true, genuine, and authentic copy of January 19-20, 2016 emails between Tracey Jacobs, Andrew Thau, Joel Mandel, and Jeremy Zimmer.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to

Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19213 appears to be a copy of an email between Tracey Jacobs, Andrew Thau, Joel Mandel, and Jeremy Zimmer. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

8. Please admit that the document produced as DEPP19215 and attached as **Exh. 8** is a true, genuine, and authentic copy of a January 26, 2016 email between Tracey Jacobs, Jim Berkus, Jeremy Zimmer, Joel Mandel, and the email address jab@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19215 appears to be a copy of an email between Tracey Jacobs, Jim Berkus, Jeremy Zimmer, Joel Mandel, and the email address jab@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal

knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

9. Please admit that the document produced as DEPP19216 and attached as **Exh. 9** is a true, genuine, and authentic copy of February 12, 2016 emails between Tracey Jacobs, Joel Mandel, Christi Dembrowski, and the email addresses danny@bhdrl.com, mls@bhdrl.com, and jab@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing

specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19216 appears to be a copy of an email between Tracey Jacobs, Joel Mandel, Christi Dembrowski, and the email addresses danny@bhdrl.com, mls@bhdrl.com, and jab@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

10. Please admit that the document produced as DEPP19217 and attached as **Exh. 10** is a true, genuine, and authentic copy of a March 7, 2016 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it

implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19217 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

11. Please admit that the document produced as DEPP19218 and attached as **Exh. 11** is a true, genuine, and authentic copy of a March 9, 2016 email between Tracey Jacobs, Gueran Ducoty, Christi Dembrowski, Joel Mandel, Jenna Gates (Jacobs), and the email addresses danny@bhdrl.com and mls@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19218 appears to be a copy of an email between Tracey Jacobs, Gueran Ducoty, Christi Dembrowski, Joel Mandel, Jenna Gates (Jacobs), and the email addresses danny@bhdrl.com and mls@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

12. Please admit that the document produced as DEPP19219-19224 and attached as **Exh. 12** are true, genuine, and authentic copy of February 2-5, 2016 emails between Emily Speak, David Kitchen, Linda Curtis, Joel Mandel, Andrew Thau, Nicholas R. Dumas, Kevin Wells, and Alyssa Gallo.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or

work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19219-19224 appears to be a copy of an email between Emily Speak, David Kitchen, Linda Curtis, Joel Mandel, Andrew Thau, Nicholas R. Dumas, Kevin Wells, and Alyssa Gallo. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

13. Please admit that the document produced as DEPP19225-19230 and attached as **Exh. 13** is a true, genuine, and authentic copy of the document titled "Agreement in Consideration of Guaranty" that was attached to the emails produced by Mr. Depp as DEPP19219-19224.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19225-19230 appears to be "a true, genuine, and authentic copy" of a document titled "Agreement in Consideration of Guaranty".

14. Please admit that the document produced as DEPP19233 and attached as **Exh. 14** is a true, genuine, and authentic copy of November 15, 2014 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication.

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19233 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

15. Please admit that the document produced as DEPP19234-19236 and attached as **Exh. 15** is a true, genuine, and authentic copy of February 26, 2015 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19234-19236 appears to be a copy of an email between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his

response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

16. Please admit that the document produced as DEPP19237-19238 and attached as **Exh. 16** is a true, genuine, and authentic copy of February 27, 2015 emails between Tracey Jacobs, Sean Bailey, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19237-19238 appears to be a copy of an email between Tracey Jacobs, Sean Bailey, and Christi Dembrowski.

Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

17. Please admit that the document produced as DEPP19239 and attached as **Exh. 17** is a true, genuine, and authentic copy of April 14-15, 2015 emails between Tracey Jacobs, Scott Cooper, John Leshner, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from

disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19239 appears to be a copy of an email between Tracey Jacobs, Scott Cooper, John Leshner, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

18. Please admit that the document produced as DEPP19240-19253 and attached as **Exh. 18** is a true, genuine, and authentic copy of text messages between Tracey Jacobs and Edward White.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19240-19253 appears to be a copy of text messages between Tracey Jacobs and Edward White. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his

response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

19. Please admit that the document produced as DEPP19254-19300 and attached as **Exh. 19** is a true, genuine, and authentic copy of July 18-October 26, 2016 text messages between Tracey Jacobs and Mr. Depp.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits DEPP19254-19300 appears to be a copy of text messages between Tracey Jacobs and Mr. Depp.

20. Please admit that the document produced as DEPP19790 and attached as **Exh. 20** is a true, genuine, and authentic copy of an April 14, 2015 email between Magdolna Nyeso, Edward Allanby, Joel Mandel, Joe Kaczorowski, Robert Corzo, Neil Shah, Jacob Bloom, Sandra Spierenburg, and Maarten Melchor.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19790 appears to be a copy of an email between Magdolna Nyeso, Edward Allanby, Joel Mandel, Joe Kaczorowski, Robert Corzo, Neil Shah, Jacob Bloom, Sandra Spierenburg, and Maarten Melchor. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-

discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

21. Please admit that the document produced as DEPP19791-19795 and attached as **Exh. 21** is a true, genuine, and authentic copy of the attachment to the email produced by Mr. Depp as DEPP19790.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19791-19795 appears to be a copy of the attachment.

22. Please admit that the document produced as DEPP19797-19798 and attached as **Exh. 22** is a true, genuine, and authentic copy of April 14 and April 21, 2016 emails and an attachment between Robert Corzo, Neil Shah, Donald Starr, Danny Watts, and Stanley Buchtal.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19797-19798 appears to be a copy of emails between Robert Corzo, Neil Shah, Donald Starr, Danny Watts, and Stanley Buchtal. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-

discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

23. Please admit that the document produced as DEPP19801-19839 and attached as **Exh. 23** is a true, genuine, and authentic copy of a document dated August 7, 2002, titled "Memorandum of Agreement," and with the Subject "PIRATES OF THE CARIBBEAN/ JOHNNY DEPP/ACTOR."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19801-19839 appears to be a copy of a document titled "Memorandum of Agreement," and with the Subject "PIRATES OF THE CARIBBEAN/ JOHNNY DEPP/ACTOR."

24. Please admit that the document produced as DEPP19840-19843 and attached as **Exh. 24** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "GUARANTY."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19840-19843 appears to be a copy of a document titled "GUARANTY."

25. Please admit that the document produced as DEPP19844-19849 and attached as **Exh. 25** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "FIRST MATE PRODUCTIONS, INC. ACTOR/LOAN-OUT STANDARD TERMS AND CONDITIONS."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19844-19849 appears to be a copy of

a document titled "FIRST MATE PRODUCTIONS, INC. ACTOR/LOAN-OUT STANDARD TERMS AND CONDITIONS."

26. Please admit that the document produced as DEPP19850-19852 and attached as **Exh. 26** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO THE STANDARD TERMS AND CONDITIONS FOR AN ACTOR (LOAN OUT)."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19850-19852 appears to be a copy of a document titled "RIDER TO THE STANDARD TERMS AND CONDITIONS FOR AN ACTOR (LOAN OUT)."

27. Please admit that the document produced as DEPP19853-19865 and attached as **Exh. 27** is a true, genuine, and authentic copy of an August 7, 2002 document titled "Exhibit 'CB'".

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to

the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19853-19865 appears to be a copy of a document titled "EXHIBIT 'CB'".

28. Please admit that the document produced as DEPP19866-19876 and attached as **Exh. 28** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO EXHIBIT 'CB'."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19866-19876 appears to be a true, copy of a document titled "RIDER TO EXHIBIT 'CB'."

29. Please admit that the document produced as DEPP19877-19887 and attached as **Exh. 29** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "Exhibit DRCB."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to

this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19877-19887 appears to be a of a document titled "EXHIBIT DRCB."

30. Please admit that the document produced as DEPP19888-19897 and attached as **Exh. 30** is a true, genuine, and authentic copy of a document dated August 7, 2002 titled "RIDER TO EXHIBIT 'DRCB'."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19888-19897 appears to be a copy of a document titled "RIDER TO EXHIBIT DRCB."

31. Please admit that the document produced as DEPP19906-19954 and attached as **Exh. 31** is a true, genuine, and authentic copy of a document dated August 28, 2008, titled "Memorandum of Agreement," and with the Subject "'ALICE IN WONDERLAND'/JOHNNY DEPP/ACTOR."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, Plaintiff admits that DEPP19906-19954 appears to be “a true, genuine, and authentic copy” of a document titled “ALICE IN WONDERLAND'/JOHNNY DEPP/ACTOR.”

32. Please admit that the document produced as DEPP20019-20063 and attached as **Exh. 32** is a true, genuine, and authentic copy of an October 8, 2014 document titled "Tyron Management Services Limited."

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing

specific and general objections, Plaintiff admits that DEPP20019-20063 appears to be a copy of a document titled “Tyron Management Services Limited.”

33. Please admit that the document produced as DEPP20078 and attached as **Exh. 33** is a true, genuine, and authentic copy of a November 1, 2016 email from Michael Sinclair to Jacob Bloom, Edward White, Andrew Thau, Bryan Freedman, and the email address ssroloff@caa.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20078 appears to be a copy of an email from Michael Sinclair to Jacob Bloom, Edward White, Andrew Thau, Bryan Freedman, and the email address ssroloff@caa.com. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is a copy.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

34. Please admit that the document produced as DEPP20079-20084 and attached as **Exh. 34** is a true, genuine, and authentic copy of the attachment to the email produced by Mr. Depp as DEPP20078.

ANSWER:

Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility,

including without limitation hearsay and relevance, Plaintiff admits that DEPP20079-20084 appears to be a copy of a letter addressed to Mr. Depp.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

35. Please admit that the document produced as DEPP20086-20087 and attached as **Exh. 35** is a true, genuine, and authentic copy of September 30, 2015 emails between Tracey Jacobs and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information

protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20086-20087 appears to be a copy of emails between Tracey Jacobs and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

36. Please admit that the document produced as DEPP20088 and attached as **Exh. 36** is a true, genuine, and authentic copy of a September 2, 2015 email between Tracey Jacobs, Joel Mandel, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20088 appears to be a copy of an email between Tracey Jacobs, Joel Mandel, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his

response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

37. Please admit that the document produced as DEPP20089 and attached as **Exh. 37** is a true, genuine, and authentic copy of September 10, 2015 emails between Andrew Thau, Tracey Jacobs, Christi Dembrowski, and the email address danny@bhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20089 appears to be a copy of emails between Andrew Thau, Tracey Jacobs, Christi Dembrowski, and the email address danny@bhdrl.com. Because Plaintiff was not included on the communication, Plaintiff

otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

38. Please admit that the document produced as DEPP20090 and attached as **Exh. 38** is a true, genuine, and authentic copy of March 24, 2016 emails between Bec Smith, Tracey Jacobs, Rena Ronson, Jim Meenaghan, Jeremy Landau, and Christi Dembrowski.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information

protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP20090 appears to be a copy of emails between Bec Smith, Tracey Jacobs, Rena Ronson, Jim Meenaghan, Jeremy Landau, and Christi Dembrowski. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

39. Please admit that the document produced as DEPP19205 and attached as **Exh. 39** is a true, genuine, and authentic copy of November 22, 2013 emails between Tracey Jacobs, Christi Dembrowski, Joel Mandel, Rachel Arlook (Jacobs), and the email addresses jab@bhdrl.com, danny@bhdrl.com, and mls@nhdrl.com.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Tracey Jacobs and Christi Dembrowski. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of

the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

40. Please admit that the document produced as DEPP19206 and attached as **Exh. 40** is a true, genuine, and authentic copy of December 6, 2013 emails between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19206 appears to be a copy of emails between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

41. Please admit that the document produced as DEPP19212 and attached as **Exh. 41** is a true, genuine, and authentic copy of a November 16, 2015 email between Tracey Jacobs and Joel Mandel.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff

further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including without limitation hearsay and relevance, Plaintiff admits that DEPP19212 appears to be a copy of an email between Tracey Jacobs and Joel Mandel. Because Plaintiff was not included on the communication, Plaintiff otherwise lacks sufficient knowledge to admit or deny whether the email is “a true, genuine, and authentic copy”.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff’s lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

42. Please admit that the document produced as DEPP19796 and attached as **Exh. 42** is a true, genuine, and authentic copy of April 18, 2016 emails between Jacob Bloom and Donald Starr.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible

evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Jacob Bloom and Donald Starr. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

43. Please admit that the document produced as DEPP20064 and attached as **Exh. 43** is a true, genuine, and authentic copy of January 6-7, 2015 emails between Joe Kaczorowski, Danny Watts, and Donald Starr.

ANSWER:

Plaintiff objects to this request to the extent it seeks information that is in the possession, custody or control of Defendant or third parties. Plaintiff further objects to this request on the grounds that it is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Plaintiff further objects to this request on the grounds and to the extent that it implicates private and/or confidential information that is not at issue. Plaintiff further objects to this request to the extent it seeks information that is available to and equally accessible to Defendant. Plaintiff further objects on the grounds Plaintiff is not included in this communication. Plaintiff objects to this request to the extent it seeks privileged information protected from disclosure, including information protected by the attorney-client privilege or work product doctrine and any other applicable privilege, immunity or protection. Plaintiff further objects to this request as the request is compound. Plaintiff objects to this request because the request does not have the specific document appended to the request. Subject to the foregoing specific and general objections, and specifically reserving all objections to admissibility, including relevance and hearsay, Plaintiff admits that the document appears to be a copy of an email among Joe Kaczorowski, Danny Watts, and Donald Starr. Plaintiff was not copied and is otherwise unable to admit or deny the authenticity.

SUPPLEMENTAL ANSWER:

Plaintiff repeats and incorporates by this reference the above-stated general and specific objections as though set forth in full, specifically including Plaintiff's lack of personal knowledge of the document in question. Subject to and without waiver of the foregoing general and specific objections, reserving the right to withdraw any admissions in the event of after-

discovered information, and reserving all objections as to admissibility, Plaintiff supplements his response as follows: Plaintiff lacks personal knowledge of the creation, sending, and/or receipt of the document in question, and is not in a position to authenticate it from personal knowledge. However, Plaintiff is unaware of any reason to believe that the document is not authentic and presumes that it is. On that basis, its authenticity is admitted, while reserving all objections to admissibility, including without limitation relevance and hearsay.

Dated: January 3, 2022

Respectfully submitted,



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*Counsel for Plaintiff and
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CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of January 2022, I caused copies of the foregoing to be served via email (per written agreement between the Parties) on the following:

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