

REQUESTS FOR PRODUCTION OF DOCUMENTS

REQUEST FOR PRODUCTION NO. 1:

Please PRODUCE all COMMUNICATIONS with any other PERSON (except YOUR legal counsel) RELATING TO BCS's allegation that DEFENDANTS unlawfully accessed BCS's accounts and computers, including, but not limited to, COMMUNICATIONS with, between and among, YOU, Vanessa Hughes, Jennifer Magill, BCS, Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), and/or Martha Thompson.

RESPONSE NO. 1:

DENY: Request overly broad and unduly burdensome for me to comply with. Frankly, it is unclear what exactly is being requested, as the allegations against the defendants are clearly stated in the plaintiff's complaint and not a discussion I was privy to during the creation of this case.

COMMUNICATIONS between myself and Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), Martha Thompson and/or "any other person", relating to BCS's allegation that DEFENDANTS unlawfully accessed BCS's accounts and computers would be purely speculative commentary and unlikely to lead to any material evidence.

Communications between myself and representatives of the BCS organization, including but not limited to Vanessa Hughes and Jenny Magill would be accessible through requesting discovery from the plaintiff. I should not

be burdened with the task of facilitating discovery that is readily available to the involved parties in this case.

REQUEST FOR PRODUCTION NO. 2:

Please PRODUCE all COMMUNICATIONS with any other PERSON (except YOUR legal counsel) RELATING TO BCS's allegation that YOU interfered with BCS's social media accounts, including but not limited to, COMMUNICATIONS with, between and among, YOU, Vanessa Hughes, Jennifer Magill, BCS, Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), and/or Martha Thompson.

DENY: BCS' allegations were made via BCS v Papciak et al. This is readily available via public domain and the defense already has access to it.

No COMMUNICATIONS EXIST with Vanessa Hughes, Jenny Magill or BCS regarding their allegations of interference with socials, as I did not personally have control of BCS socials. These allegations only became relevant to me because they included allegations against my co-defendants within the same lawsuit.

Any communications between myself and Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), and/or Martha Thompson regarding these allegations would be protected by joint defense privilege as we shared attorneys in common which necessitated the sharing of information.

REQUEST FOR PRODUCTION NO. 3:

Please PRODUCE all COMMUNICATIONS with any other PERSON (except YOUR legal counsel) RELATING TO BCS's allegation that DEFENDANTS interfered with BCS's social media accounts, including but not limited to, COMMUNICATIONS with, between and among, YOU, Vanessa Hughes, Jennifer Magill, BCS, Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), and/or Martha Thompson.

DENY: Request overly broad and unduly burdensome for me to comply with. Frankly, it is unclear what exactly is being requested, as the allegations against the defendants are clearly stated in the plaintiff's complaint and not a discussion I was privy to during the creation of this case.

COMMUNICATIONS between myself and Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), Martha Thompson and/or "any other person", relating to BCS's allegation that DEFENDANTS interfered with BCS's social media accounts would be purely speculative commentary and unlikely to lead to any material evidence.

Communications between myself and representatives of the BCS organization, including but not limited to Vanessa Hughes and Jenny Magill would be accessible through requesting discovery from the plaintiff. I should not be burdened with the task of facilitating discovery that is readily available to the involved parties in this case.

REQUEST FOR PRODUCTION NO. 4:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the registration and ownership of the Breakingcodesilence.org domain.

AGREE: [REDACTED] This chat is readily available to the defense. Description: I instructed JENNA to buy BreakingCodeSilence.org for BCS, Katherine McNamara offered to “just buy the domains” while I would build the website. This was intended for BCS, not for Katherine’s personal ownership. She bought it as a BCS team member, for the benefit of the campaign and proposed entity. Submitted to **Trust Array** - 2081 Arena Blvd., Suite 200 Sacramento, CA 95834 Tel: 916.610.0060 records@trustarray.com

REQUEST FOR PRODUCTION NO. 5:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the ownership of the Breakingcodesilence.net domain.

AGREE: [REDACTED] Description: March 2021 - Jen Robison transferred the Squarespace website to me. Submitted to **Trust Array** - 2081

Arena Blvd., Suite 200 Sacramento, CA 95834 Tel: 916.610.0060

records@trustarray.com

REQUEST FOR PRODUCTION NO. 6:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the creation and ownership of any groups on Facebook using the “Breaking Code Silence” name.

AGREE: [REDACTED] - Group chat created in 2019, including Katherine McNamara, Jenna Bulis, Jen Robison, Rebecca Moorman, Emily Carter myself, as well as others. This chat is readily available to the defense, as Katherine McNamara had access until she quit on March 9th 2021. Submitted to Trust Array - 2081 Arena Blvd., Suite 200 Sacramento, CA 95834 Tel: 916.610.0060 records@trustarray.com

REQUEST FOR PRODUCTION NO. 7:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the creation and ownership of the Zotero Database created by Katherine McNamara.

DENY: If they exist, I do not have access to these DOCUMENTS or COMMUNICATIONS.

REQUEST FOR PRODUCTION NO. 8:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the creation and ownership of the <https://www.instagram.com/breakingcodesilence/> Instagram account.

AGREE: [REDACTED] - Group chat created in 2019, including Katherine McNamara, Jenna Bulis, Jen Robison, Rebecca Moorman, Emily Carter myself, as well as others. This chat is readily available to the defense, as Katherine McNamara had access until she quit on March 9th 2021. Submitted to Trust Array - 2081 Arena Blvd., Suite 200 Sacramento, CA 95834 Tel: 916.610.0060 records@trustarray.com

REQUEST FOR PRODUCTION NO. 9:

Please PRODUCE all DOCUMENTS including any COMMUNICATIONS with any PERSON (except YOUR legal counsel) which RELATE TO the creation and ownership of the <https://www.twitter.com/breakingcodesi3> Twitter account.

AGREE: [REDACTED] - Group chat created in 2019, including Katherine McNamara, Jenna Bulis, Jen Robison, Rebecca Moorman, Emily Carter myself, as well as others. This chat is readily available to the defense, as Katherine McNamara had access until she quit on March 9th 2021. Submitted to Trust Array - 2081 Arena Blvd., Suite 200 Sacramento, CA 95834 Tel:

REQUEST FOR PRODUCTION NO. 10:

Please PRODUCE all COMMUNICATIONS with any other PERSON (except YOUR legal counsel) RELATING TO initiating or defending lawsuits by or against DEFENDANTS including, but not limited to, COMMUNICATIONS with, between and among, YOU, Vanessa Hughes, Jennifer Magill, BCS, Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), and/or Martha Thompson.

DENY: Request overly broad and unduly burdensome for me to comply with. The request is confusing as it asks for communications that wouldn't exist or as a non-party, I would not be legally privy to.

Neither Katherine nor Jeremy were ever named plaintiffs in the BCS case. They were board members of the entity at the time the lawsuit was filed, but both resigned before the lawsuit concluded. Therefore *BCS v Papciak* would not be considered a lawsuit defended by or against defendants.

I am not a party to the current case, or any other case related to the parties, therefore, I would not be privy to discussions about initiating or defending lawsuits by or against defendants, as the discussion of ongoing litigation is privileged information between the parties and their attorneys.

COMMUNICATIONS between myself and Jenna Bulis, Jennifer Walker (a.k.a. Jen Robison), Martha Thompson and/or "any other person", relating to initiating or defending lawsuits by or against DEFENDANTS would be purely

speculative commentary and unlikely to lead to any material evidence.

Communications between myself and representatives of the BCS organization, including but not limited to Vanessa Hughes and Jenny Magill would be accessible through requesting discovery from the plaintiff. I should not be burdened with the task of facilitating discovery that is readily available to the involved parties in this case.

REQUEST FOR PRODUCTION NO. 11:

Please PRODUCE all DOCUMENTS signed by YOU under penalty of perjury in connection with the action entitled *Breaking Code Silence v. Papciak, et al.*, CDCA Case No. 3:21-CV-00918.

AGREE: Declaration of Chelsea Papciak in support of Defendant's Motion to Dismiss. This Document is readily available through PACER and the public domain. Submitted to **Trust Array** - 2081 Arena Blvd., Suite 200 Sacramento, CA 95834 Tel: 916.610.0060 records@trustarray.com

REQUEST FOR PRODUCTION NO. 12:

Please PRODUCE all DOCUMENTS and COMMUNICATIONS RELATED TO any settlement of the action entitled *Breaking Code Silence v. Papciak, et al.*, CDCA Case No. 3:21- CV-00918 including, but not limited to, COMMUNICATIONS with BCS RELATED TO the payment of YOUR attorneys' fees.

DENY: No such DOCUMENTS exist, as no settlement agreement was ever reached or entered into.

DENY: COMMUNICATIONS regarding settlement negotiations were protected by a mediation clause, contractually agreed to by all parties.

REQUEST FOR PRODUCTION NO. 13:

Please PRODUCE all DOCUMENTS which reflect or RELATE TO all settlement offers or agreements made or entered into RELATED TO the action entitled *Breaking Code Silence v. Papciak, et al.*, CDCA Case No. 3:21-CV-00918 including, but not limited to, any offers or agreements for YOU to receive a portion of any funds collected in connection with any lawsuit filed against DEFENDANTS, Mary Appelgate, and/or Unsilenced.

DENY: No such DOCUMENTS exist, as no settlement agreement was ever reached or entered into.

DENY: DOCUMENTS regarding settlement negotiations were protected by a mediation clause, contractually agreed to by all parties.

REQUEST FOR PRODUCTION NO. 14:

Please PRODUCE all DOCUMENTS RELATED TO all assignments of intellectual property from YOU to BCS, and the reason(s) therefor.

AGREED: Assignment of Trademark, Chelsea Papciak Affidavit.

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REQUEST FOR PRODUCTION NO. 15:

Please PRODUCE all DOCUMENTS RELATED TO all assignments of domains from YOU to BCS, and the reason(s) therefor.

DENY: No such DOCUMENTS exist.

REQUEST FOR PRODUCTION NO. 16:

Please PRODUCE all DOCUMENTS RELATED TO any agreements (written or oral) between YOU and BCS, and the reason(s) therefor.

DENY: No such DOCUMENTS exist

REQUEST FOR PRODUCTION NO. 17:

Please PRODUCE all DOCUMENTS RELATED TO any agreements (written or oral) between YOU and Rise Justice Labs, and the reason(s) therefor.

AGREE: RJL Media Release, RJL Grant Application. Will submit to

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