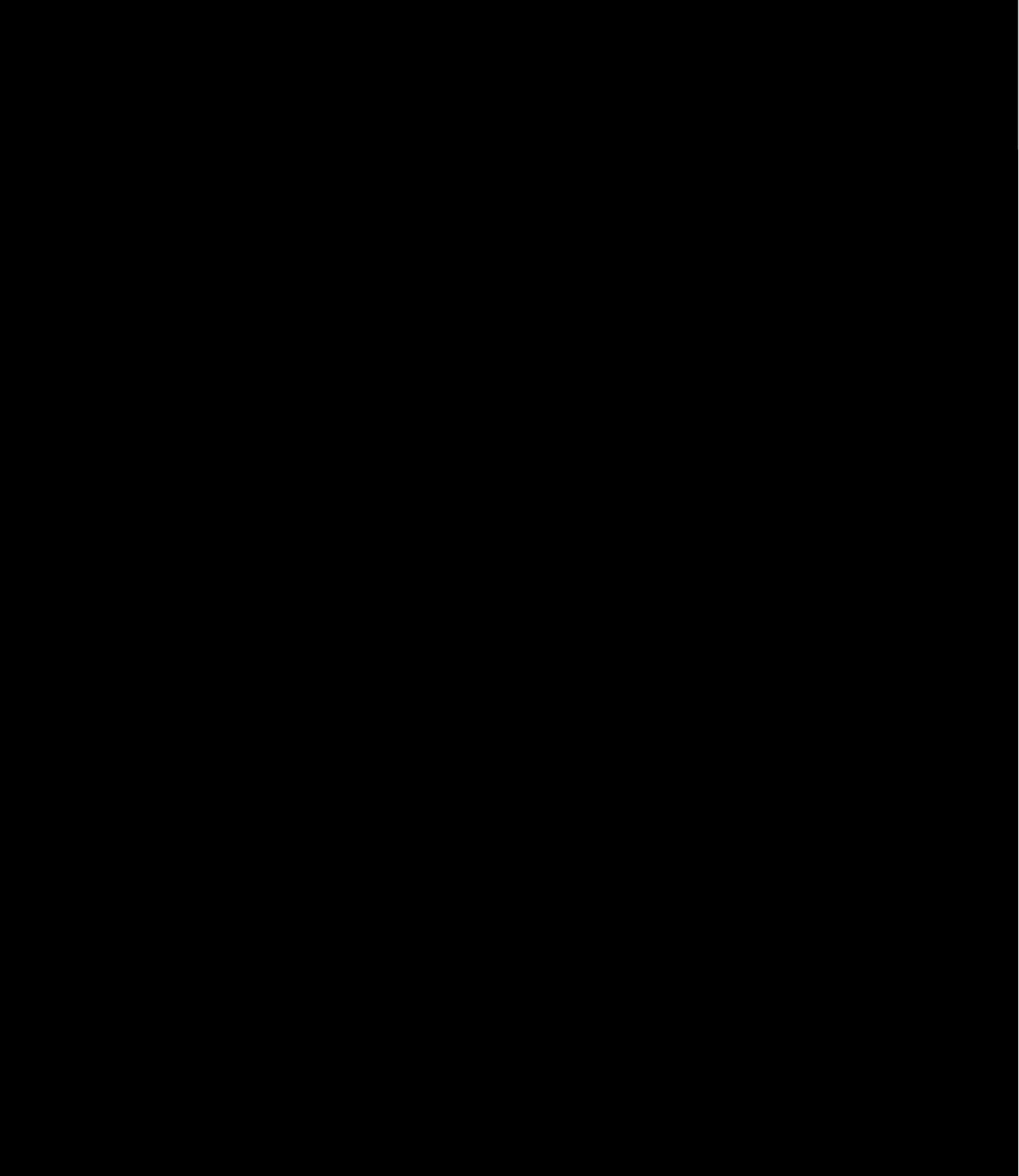




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INTERROGATORY NO. 8:

IDENTIFY each and every domain name YOU have registered since February 1, 2020.

1 **RESPONSE TO INTERROGATORY NO. 8:**

2 In addition to the General Objections set forth above and incorporated herein,
3 Responding Party objects to this Interrogatory on the ground that it is vague and
4 ambiguous as to the term “IDENTIFY” which is only defined with respect to
5 persons and communications (not domains or other tangible things). If Plaintiff
6 intends the term “IDENTIFY” with respect to communications to apply to the
7 accounts/databases in Interrogatory, Responding Party objects to this Interrogatory
8 on the ground that it is compound because the term “IDENTIFY” is defined to
9 request five separate and discrete subcategories of information. Responding Party
10 further objects to this Interrogatory on the ground that it is overly broad as to time
11 and scope inasmuch as, as phrased, it would encompass domains completely
12 unrelated to the accounts at issue in the litigation which were registered both before
13 and after the alleged cyber-hacking incidents occurred. To that extent, the
14 Interrogatory requests a category of information that is not relevant to the issues in
15 the case and not reasonably calculated to lead to the discovery of relevant evidence.

16 Without waiving the foregoing objections, in the interest of cooperative
17 discovery, the following domains were registered under Responding Party’s
18 corporation, Network-Node, Inc:

- 19 plzsir.com
- 20 sovabestpractices.com
- 21 wwasp.org
- 22 routergods.sex
- 23 breakingcodesilence.org
- 24 survivorland.org
- 25 survivorland.net
- 26 wwasp.net
- 27 troubledteenwiki.com
- 28 sciad.net



- 1 ciscoplussecuremalwareanalyticsflexgrid.com
- 2 wearebreakingcodesilence.org
- 3 wearebreakingcodesilence.com
- 4 wearebreakingcodesilence.net
- 5 drvanessahughes.com
- 6 drvanessahughes.org
- 7 drvanessahughes.net
- 8 jennymagill.net
- 9 breakingcodesilencelawsuit.com
- 10 breakingcodesilencelawsuit.org
- 11 breakingcodesilencelawsuit.net
- 12 katherinermcnamara.com
- 13 katherinermcnamara.org
- 14 katherinermcnamara.net
- 15 katherinerosemcnamara.com
- 16 katherinerosemcnamara.org
- 17 katherinerosemcnamara.net
- 18 katherinerosemcnamaralawsuit.net
- 19 katherinerosemcnamaralawsuit.com
- 20 katherinerosemcnamaralawsuit.org
- 21 katherinermcnamaralawsuit.com
- 22 katherinermcnamaralawsuit.org
- 23 katherinermcnamaralawsuit.net
- 24 katherinemcnamaralawsuit.org
- 25 katherinemcnamaralawsuit.com
- 26 katherinemcnamaralawsuit.net
- 27 breakcodesilence.com
- 28 breakcodesilence.net



- 1 breakcodesilence.net
- 2 certification-princess.com
- 3 certification-princess.com
- 4 etherealwhine.com
- 5 fur-stack-engineer.com
- 6 fur-stack.engineer
- 7 not-a-thought-leader.com
- 8 p90x.engineer
- 9 whiny-whiny-princess.com
- 10 pcsreports.com
- 11 provo-canyon-school.com
- 12 provocanyonreports.com
- 13 thetetrationarchitect.com
- 14 sharpigate.live
- 15 bcsaction.com
- 16 bcsaction.net
- 17 bcsaction.org
- 18 bcsaction.org
- 19 breakingcodesilencenetwork.com
- 20 breakingcodesilencenetwork.org
- 21 bcsactionnetwork.com
- 22 bcsactionnetwork.net
- 23 bcsactionnetwork.org
- 24 breakingcodesilenceactionnetwork.com
- 25 breakingcodesilenceactionnetwork.net
- 26 breakingcodesilenceactionnetwork.org
- 27 breakingcodesilence.online
- 28 bcsteenadvocacynetwork.net



- 1 bcsteenadvocacynetwork.org
- 2 breakingcodesilenceteenadvocacy.network
- 3 breakingcodesilenceteenadvocacynetwork.com
- 4 breakingcodesilenceteenadvocacynetwork.net
- 5 breakingcodesilenceteenadvocacynetwork.org
- 6 bcsyouthadvocacynetwork.com
- 7 bcsyouthadvocacynetwork.net
- 8 bcsyouthadvocacynetwork.org
- 9 breakingcodesilenceyouthadvocacynetwork.com
- 10 breakingcodesilenceyouthadvocacynetwork.net
- 11 breakingcodesilenceyouthadvocacynetwork.org
- 12 breakingcodesilencemovie.com
- 13 breakingcodesilencemovie.net
- 14 breakingcodesilencemovie.org
- 15 breakingcodesilencethemovie.com
- 16 breakingcodesilencethemovie.net
- 17 breakingcodesilencethemovie.org
- 18 troubledteendatabase.com
- 19 troubledteendatabase.net
- 20 troubledteendatabase.org
- 21 ttidatabase.com
- 22 ttidatabase.net
- 23 ttidatabase.org
- 24 troubledteenwiki.com
- 25 icadatabase.com
- 26 icadatabase.net
- 27 icadatabase.org
- 28 fuckbreakingcodesilence.org

- 1 nowunsilenced.com
- 2 nowunsilenced.net
- 3 nowunsilenced.org
- 4 unsilencedinc.com
- 5 unsilencedinc.net
- 6 unsilencedinc.org
- 7 weareunsilenced.com
- 8 weareunsilenced.net
- 9 weareunsilenced.org

10
11 DATED: December 27, 2022

JULANDER, BROWN & BOLLARD

12
13 By: Catherine Close


14 Dirk O. Julander
15 Catherine Close
16 Attorneys for Defendants
17 KATHERINE MCNAMARA and
18 JEREMY WHITELEY
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VERIFICATION FOR RESPONSES

I, Katherine McNamara am a party to the action, and hereby declare under penalty of perjury that based on a reasonable inquiry, the facts stated in the foregoing Responses to Defendant Breaking Code Silence’s Interrogatories, Set One are true and correct to the best of my knowledge, information, and belief.

Executed on December 27, 2022 at San Gabriel, California .

Katherine McNamara
Print Name of Signatory


Signature

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CERTIFICATE OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 9110 Irvine Center Drive, Irvine, CA 92618.

On December 27, 2022, I served true copies of the following document(s) described as **DEFENDANT KATHERINE MCNAMARA’S RESPONSES TO INTERROGATORIES, SET ONE** on the interested parties in this action as follows:

Tamany J. Vinson Bentz
Jason T. Lueddeke
Benjamin Grush
Michael P. Brown
DLA PIPER LLP
2000 Avenue of the Stars
Suite 400 North Tower
Los Angeles, California 90067-4704

Email: tamany.bentz@us.dlapiper.com; jason.lueddeke@us.dlapiper.com; benjamin.grush@us.dlapiper.com; michael.p.brown@us.dlapiper.com

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address helene@jbblaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on December 27, 2022, at Irvine, California.

Helene Saller

Helene Saller

1 Dirk O. Julander, Bar No. 132313
doj@jbblaw.com
2 Catherine A. Close, Bar No. 198549
cac@jbblaw.com
3 M. Adam Tate, Bar No. 280017
adam@jbblaw.com
4 JULANDER, BROWN & BOLLARD
9110 Irvine Center Drive
5 Irvine, California 92618
Telephone: (949) 477-2100
6 Facsimile: (949) 477-6355
7 Attorneys for Plaintiffs KATHERINE
MCNAMARA and JEREMY WHITELEY
8
9

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF LOS ANGELES, STANLEY MOSK COURTHOUSE
12

13 KATHERINE MCNAMARA, an individual;
and JEREMY WHITELEY, an individual,
14

15 Plaintiffs,
16

17 vs.
18

18 BREAKING CODE SILENCE, a
California 501(c)(3) nonprofit corporation;
19 VANESSA HUGHES, an individual;
20 JENNIFER REBECCA MAGILL, an
individual; and DOES 1-20, inclusive,
21
22 Defendants.

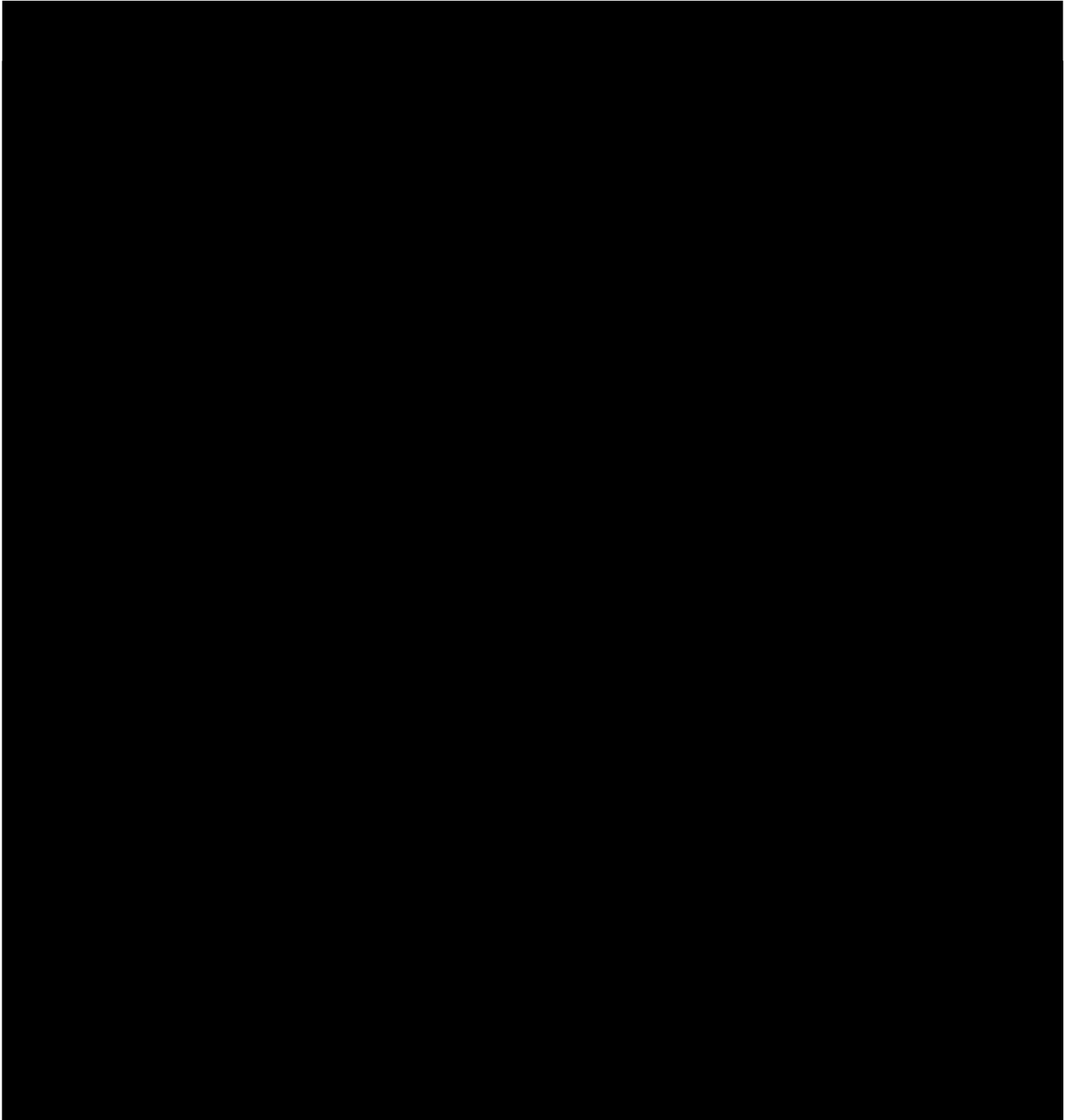
Case No. 22STCV14977

ASSIGNED FOR ALL PURPOSES TO:
Hon. Kristin S. Escalante
Dept. 24

**PLAINTIFF KATHERINE McNAMARA'S
RESPONSES TO REQUESTS FOR
PRODUCTION (SET ONE)
PROPOUNDED BY VANESSA HUGHES**

Action Filed: May 5, 2022
Trial Date: November 13, 2023

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REQUEST FOR PRODUCTION NO. 17:

Please produce all DOCUMENTS that YOU have received through the website <https://www.breakingcodesilencelawsuit.com/> in response to YOUR request reflected on that website which provides, “Can you help us? Do you have any whistleblower tips that can help our case that you are legally able to share?”

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

2 Responding Party refers to the documents produced and Bates stamped: JW 003020 – JW
3 003037, JW 003230, KM 013027 - KM 013045.

4
5 **REQUEST FOR PRODUCTION NO. 18:**

6 Please produce all DOCUMENTS that reflect or relate to communications between YOU
7 and William Bratcher about DEFENDANT.

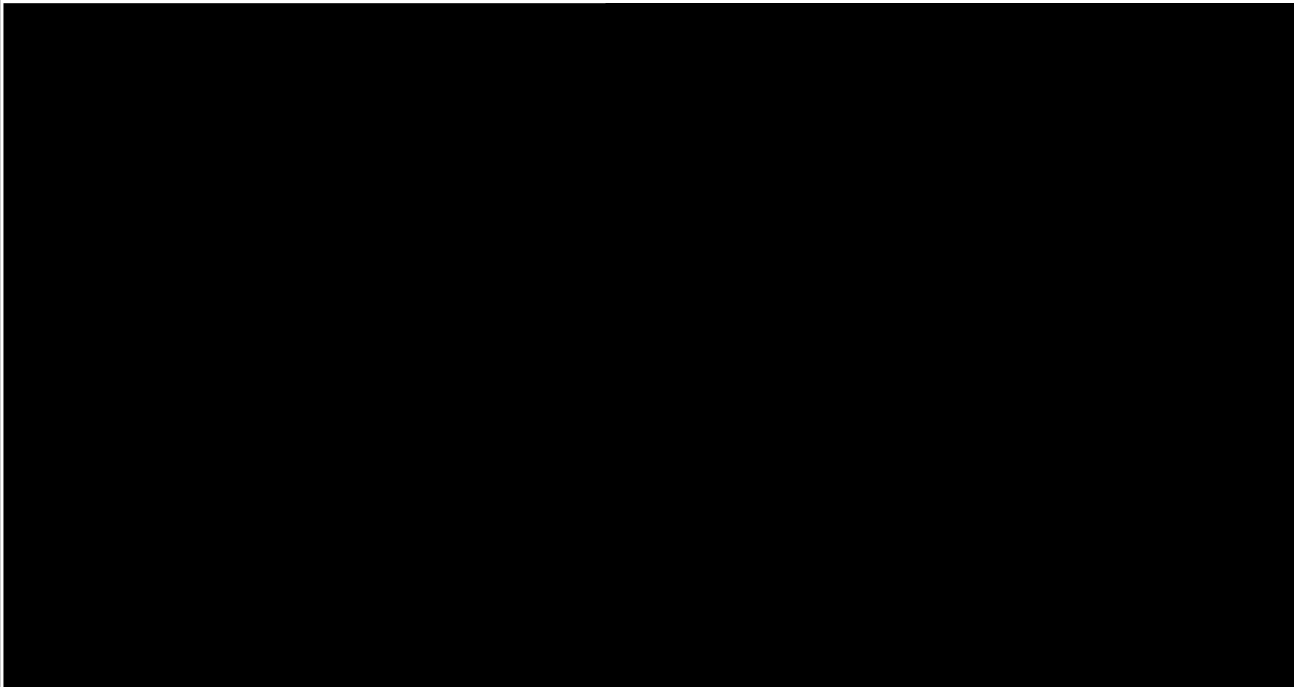
8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

9 Responding Party objects to this Request on the following grounds: This Request is overly
10 broad in time and scope. This Request is unduly burdensome and harassing. This Request seeks a
11 category of documents which is not relevant to the claims and defenses in this action and not
12 reasonably calculated to lead to the discovery of admissible evidence.

13 Without waiving the foregoing objections, and expressly subject to each of them,
14 Responding Party responds as follows:

15 Responding Party refers to the documents produced and Bates stamped: KM 013046 - KM
16 013055.

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VERIFICATION

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES


I have read the foregoing **RESPONSES TO REQUESTS FOR PRODUCTION OF DOCUMENTS, SET ONE PROPOUNDED BY VANESSA HUGHES** and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on March 10, 2023, at San Gabriel, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Katherine McNamara
Print Name of Signatory


Signature

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 9110 Irvine Center Drive, Irvine, CA 92618.

On March 10, 2023, I served true copies of the following document(s) described as **PLAINTIFF KATHERINE McNAMARA'S RESPONSES TO REQUESTS FOR PRODUCTION (SET ONE) PROPOUNDED BY VANESSA HUGHES** on the interested parties in this action as follows:

Kathleen Carter
Jennifer Berneking
Benjamin Cutchshaw
MESSNER REEVES LLP
650 Town Center Drive, Suite 700
Costa Mesa, CA 92626

Attorneys for Defendants
BREAKING CODE SILENCE and
JENNIFER REBECCA MAGILL

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Attorneys for Defendant
VANESSA HUGHES

Email: rrclouse@csattys.com
llrangel@csattys.com
service@csattys.com

Tel: (909) 941-3388 | Fax (909) 941-3389

BY E-MAIL OR ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address helene@jbbllaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 10, 2023, at Irvine, California.

Helene Saller

Helene Saller