engines function, how data is stored and presented by companies, and
how both may change in the future, which are beyond her personal
knowledge. Defendant further objects to this Request to the extent that it
requires her to make predictions about the future, which is beyond her
personal knowledge. Defendant objects to this Request to the extent that
it seeks knowledge of actions by third parties which are outside the personal
knowledge of Defendant.

Without waiving these objections, Defendant responds: Defendant can neither admit nor deny this request for the reasons set forth in the foregoing objections.

REQUEST NO. 18:

Admit that before 2016 you knew Richard Carrier sometimes earned fees and other income from speaking engagements, including from book sales thereat.

15 **RESPONSE TO REQUEST NO. 18:**

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagements," which is undefined in
Plaintiff's Requests.

19 Without waiving this objection, Defendant responds: Denied.
20 Defendant lacks direct personal knowledge of Defendant's income
21 stream.

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1 **REQUEST NO. 19:**

Admit that as of now you know Richard Carrier sometimes earns fees
and other income from speaking engagements, including from book sales
thereat.

5 | RESPONSE TO REQUEST NO. 19:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "speaking engagements," which is undefined in Plaintiff's Requests.

9 Without waiving this objection, Defendant responds: Denied.
10 Defendant lacks direct personal knowledge of Defendant's income
11 stream.

REQUEST NO. 20:

Admit that before 2016 you knew Richard Carrier sometimes earned
fees and other income from Secular Student Alliance and affiliate speaking
engagements, including from book sales thereat.

16 **RESPONSE TO REQUEST NO. 20:**

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagements," which is undefined in
Plaintiff's Requests.

Without waiving this objection, Defendant responds: Denied.
Defendant lacks direct personal knowledge of Defendant's income
stream.

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- 13 -Defendant's Responses to Plaintiff's First Requests for Admissions CV-19-02719-PHX-JJT

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1 **REQUEST NO. 21**:

Admit that as of now you know Richard Carrier sometimes earns fees
and other income from Secular Student Alliance and affiliate speaking
engagements, including from book sales thereat.

RESPONSE TO REQUEST NO. 21:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "speaking engagements," which is undefined in Plaintiff's Requests.

Without waiving this objection, Defendant responds: Denied. Defendant lacks direct personal knowledge of Defendant's income stream.

REQUEST NO. 22:

Admit that before 2016 you knew Richard Carrier earned fees and other income from the 2015 Secular Student Alliance affiliate speaking engagement in Arizona that you attended, including from book sales thereat.

17 **RESPONSE TO REQUEST NO. 22:**

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagement," which is undefined in
Plaintiff's Requests.

Without waiving this objection, Defendant responds: Denied.
Defendant lacks direct personal knowledge of Defendant's income
stream.

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- 14 -Defendant's Responses to Plaintiff's First Requests for Admissions CV-19-02719-PHX-JJT

RANDAZZA LEGAL GROUP

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1 **REQUEST NO. 23**:

Admit that you knew when you published your allegations against
Richard Carrier that a reduction of the number of his speaking
engagements and incomes earned thereat could ensue in result of that.

RESPONSE TO REQUEST NO. 23:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "your allegations against Richard Carrier." Defendant further objects to this Request as vague and ambiguous with respect to the phrase "speaking engagements." Defendant further objects to this Request to the extent that it requires Defendant to make assumptions about the state of mind and/or actions of third parties, which is beyond Defendant's personal knowledge.

Without waiving these objections, Defendant responds: Denied.

REQUEST NO. 24:

Admit that when you published your allegations against Richard Carrier, you desired that a reduction of the number of his speaking engagements and incomes earned thereat would ensue in result of that.

RESPONSE TO REQUEST NO. 24:

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "your allegations against Richard Carrier."
Defendant further objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagements."

Without waiving these objections, Defendant responds: Denied.

- 15 -Defendant's Responses to Plaintiff's First Requests for Admissions CV-19-02719-PHX-JJT

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1 | **REQUEST NO. 27:**

Admit that you knew when you published your allegations against
Richard Carrier that, in result of that, subsequently fewer people might
attend his speaking engagements and book signing events.

RESPONSE TO REQUEST NO. 27:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "your allegations against Richard Carrier." Defendant further objects to this Request as vague and ambiguous with respect to the phrase "speaking engagements." Defendant further objects to this Request to the extent that it requires Defendant to make assumptions about the state of mind and/or actions of third parties, which is beyond Defendant's personal knowledge.

Without waiving these objections, Defendant responds: Denied.

REQUEST NO. 28:

Admit that when you published your allegations against Richard
Carrier, you desired that, in result of that, subsequently fewer people would
attend his speaking engagements and book signing events.

18 **RESPONSE TO REQUEST NO. 28:**

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "your allegations against Richard Carrier."
Defendant further objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagements."

Without waiving these objections, Defendant responds: Denied.

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RANDAZZA LEGAL GROUP

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1 **REQUEST NO. 29:**

Admit that you knew when you published your allegations against
Richard Carrier that, in result of that, subsequently fewer people might
attend his speaking engagements and book signing events.

RESPONSE TO REQUEST NO. 29:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "your allegations against Richard Carrier." Defendant further objects to this Request as vague and ambiguous with respect to the phrase "speaking engagements." Defendant further objects to this Request to the extent that it requires Defendant to make assumptions about the state of mind and/or actions of third parties, which is beyond Defendant's personal knowledge.

Without waiving these objections, Defendant responds: Denied.

REQUEST NO. 30:

Admit that when you published your allegations against Richard Carrier, you desired that, in result of that, subsequently fewer people would attend his speaking engagements and book signing events.

18 **RESPONSE TO REQUEST NO. 30:**

Defendant objects to this Request as vague and ambiguous with
respect to the phrase "your allegations against Richard Carrier."
Defendant further objects to this Request as vague and ambiguous with
respect to the phrase "speaking engagements."

Without waiving these objections, Defendant responds: Denied.

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1 **REQUEST NO. 31**:

Admit that you knew when you published your allegations against
Richard Carrier that, in result of that, subsequently fewer people might work
with or hire Richard Carrier.

5 | RESPONSE TO REQUEST NO. 31:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "your allegations against Richard Carrier." Defendant further objects to this Request to the extent that it requires Defendant to make assumptions about the state of mind and/or actions of third parties, which is beyond Defendant's personal knowledge.

Without waiving these objections, Defendant responds: Denied.

REQUEST NO. 32:

Admit that when you published your allegations against Richard Carrier, you desired that, in result of that, subsequently fewer people would work with or hire Richard Carrier.

RESPONSE TO REQUEST NO. 32:

Defendant objects to this Request as vague and ambiguous with respect to the phrase "your allegations against Richard Carrier."

Without waiving this objection, Defendant responds: Denied.

20 | | **REQUEST NO. 33**:

Admit that you knew when you published your allegations against
Richard Carrier that, in result of that, subsequently fewer people might fund
his work.

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- 19 -Defendant's Responses to Plaintiff's First Requests for Admissions CV-19-02719-PHX-JJT