

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.

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.

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

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.

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.

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

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.

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.