

# **EXHIBIT E**

Plaintiff Ward’s Motion for Protection from  
 Defendant Cisco Systems, Inc.’s Third Request for  
 Production and “Third” Request for Admissions  
 Exhibit E

Topic of Request	Defendant Cisco Systems Inc.’s “Third” Request for Admissions	Topic, Where Addressed In Prior Discovery
<b>ESN complaint</b>	<b>REQUEST FOR ADMISSIONS NO. 1:</b> Admit that the “Date Filed” column on the docket for the original complaint ESN v. Cisco lawsuit was changed from 10/15/2007 to 10/16/2007.	8/10/09 Ward Deposition at 66:12-24. Exh. A.  Cisco’s Second Set of RFAs, no. 11: “Admit that a clerk for the United States District Court for the Eastern District of Texas altered the date in the “Date Filed” column of the docket of the ESN Texas Case from 10/15/2007 to 10/16/2007.” Exh. H.
<b>Consultation with medical professionals or medical problems</b>	<b>REQUEST FOR ADMISSIONS NO. 2:</b> Admit that you have not consulted with any medical professionals (including mental health professionals) concerning the mental anguish you have alleged in this case.	8/10/09 Ward Deposition at 18:6-21:23. Exh. A.  Cisco’s Second Set of RFAs, no. 75: “Admit that you have sought no medical or psychological treatment for your alleged mental anguish.” Exh. H.
	<b>REQUEST FOR ADMISSIONS NO. 3:</b> Admit that you had problems sleeping before October 17, 2007.	8/10/09 Ward Deposition at 18:6-21:23. Exh. A.

<sup>1</sup> Though Cisco titled its Request for Admission as its “Third” set, it earlier propounded three sets of Requests for Admission making its November 5, 2009 set its fourth. To avoid confusion, it will be addressed in this motion as Cisco’s “Third” set of Requests for Admission.

	<p><b>REQUEST FOR ADMISSIONS NO. 4:</b> Admit that you consulted with a medical professional (including but not limited to mental health professionals) concerning sleeping problems you experienced before October 17, 2007.</p>	<p>8/10/09 Ward Deposition at 18:6-21:23. Exh. A. Cisco's Second Set of RFAs, no. 75: "Admit that you have sought no medical or psychological treatment for your alleged mental anguish." Exh. H</p>
	<p><b>REQUEST FOR ADMISSIONS NO. 5:</b> Admit that you have not consulted with any medical professionals (including but not limited to mental health professionals) concerning any damages have alleged in this case.</p>	<p>8/10/09 Ward Deposition at 18:6-21:23. Exh. A. Cisco's Second Set of RFAs, no. 75: "Admit that you have sought no medical or psychological treatment for your alleged mental anguish." Exh. H</p>
<p><b>Personal Background</b></p>	<p><b>REQUEST FOR ADMISSIONS NO. 6:</b> Admit that you are not admitted to practice law in Arkansas.</p>	<p>8/10/09 Ward Deposition at 141:1-14. Exh. A.</p>
<p><b>Damages</b></p>	<p><b>REQUEST FOR ADMISSIONS NO. 7:</b> Admit that you are not claiming damage to your professional reputation in this lawsuit.</p>	<p>8/10/09 Ward Deposition at 86:22-87:1 and 115:21-116:3. Exh. A.</p>
	<p><b>REQUEST FOR ADMISSIONS NO. 8:</b> Admit that you are not claiming damage to your reputation in the legal community in this lawsuit.</p>	<p>Dkt. No. 162 at 2-4.</p>
	<p><b>RESPONSE:</b></p>	<p>Dkt. No. 162 at 2-4.</p>
	<p><b>REQUEST FOR ADMISSION NO. 9:</b> Admit that you currently enjoy an excellent reputation for personal honesty and integrity.</p>	<p>8/10/09 Ward Deposition at 115:21-116:3. Exh. A.</p>
		<p>Dkt. No. 162 at 2-4.</p>