

# APPENDIX A

For ease of reference and the Court's convenience, all RFAs and the government's responses at issue are included below.

**REQUEST FOR ADMISSION NO. 3:**

Admit that DADT does not contribute to our national security.

**RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the terms "contribute" and "national security" as used in this context are vague and ambiguous. To the extent a further response is required, Defendants note the responses to requests for admission 1 and 2 supra, but deny this request because it was rational for Congress to have concluded at the time the statute was enacted in 1993 that DADT was necessary "in the unique circumstances of military service." 10 U.S.C. § 654(a)(13).

**REQUEST FOR ADMISSION NO. 4:**

Admit that DADT weakens our national security.

**RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the terms "weakens" and "national security" as used in this context are vague and ambiguous. To the extent a further response is required, Defendants note the responses to requests for admission 1 and 2 supra, but deny this request because it was rational for Congress to have concluded at the time the statute was enacted in 1993 that DADT was necessary "in the unique circumstances of military service." 10 U.S.C. § 654(a)(13).

**REQUEST FOR ADMISSION NO. 5:**

Admit that discharging service members pursuant to DADT weakens our national security.

**RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the terms “weakens” and “national security” as used in this context are vague and ambiguous. To the extent a further response is required, Defendants note the responses to requests for admission 1 and 2 supra, but deny this request because it was rational for Congress to have concluded at the time the statute was enacted in 1993 that DADT was necessary “in the unique circumstances of military service.” 10 U.S.C. § 654(a)(13).

**REQUEST FOR ADMISSION NO. 10:**

Admit that reversing DADT is essential for our national security.

**RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the terms “essential” and “national security” as used in this context are vague and ambiguous. To the extent a further response is required, Defendants note the responses to requests [sic] for admission 9 supra, but deny this request because it was rational for Congress to have concluded at the time the statute was enacted in 1993 that DADT was necessary “in the unique circumstances of military service.” 10 U.S.C. § 654(a)(13).

**REQUEST FOR ADMISSION NO. 13:**

Admit the United States cannot afford to cut LGBT service members from the ranks of its military.

**RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the term “cannot afford to cut LGBT service members” as used in this context are vague and ambiguous. To the extent a further response is required, Defendants deny this request because DADT does not prohibit the service of LGBT service members based upon sexual orientation alone, but does permit discharge based upon certain conduct.

**REQUEST FOR ADMISSION NO. 14:**

Admit the United States cannot afford to force LGBT service members to have their careers encumbered by DADT.

**RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the term “cannot afford to force LGBT service members to have their career encumbered by DADT” as used in this context are vague and ambiguous. To the extent a further response is required, Defendants deny this request because DADT does not prohibit the service of LGBT service members based upon sexual orientation alone, but does permit discharge based upon certain conduct.

**REQUEST FOR ADMISSION NO. 15:**

Admit that the United States cannot afford to force LGBT service members to live a lie.

**RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

Defendants object to this request, as it does not call for facts, the application of law to fact, or an opinion about facts or the application of law to fact. See Fed. R. Civ. P. 36(a)(1)(A). Defendants further object to this request because the term “cannot afford to force LGBT service members to live a lie” as used in this context are vague and ambiguous. To the extent a further response is required, Defendants deny this request because DADT does not prohibit the service of LGBT service members based upon sexual orientation alone, but does permit discharge based upon certain conduct.

**REQUEST FOR ADMISSION NO. 81:**

Admit that Australia permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 81:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 82:**

Admit that Austria permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 82:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 83:**

Admit that Bahamas permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 83:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 84:**

Admit that Belgium permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 84:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 85:**

Admit that the United Kingdom permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 85:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 86:**

Admit that Canada permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 86:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 87:**

Admit that the Czech Republic permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 87:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 88:**

Admit that Denmark permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 88:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 89:**

Admit that Estonia permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 89:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 90:**

Admit that Finland permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 90:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 91:**

Admit that France permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 91:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.



**REQUEST FOR ADMISSION NO. 92:**

Admit that Ireland permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 92:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 93:**

Admit that Israel permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 93:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 94:**

Admit that Italy permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 94:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 95:**

Admit that Lithuania permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 95:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 96:**

Admit that Luxembourg permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 96:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 97:**

Admit that the Netherlands permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 97:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 98:**

Admit that New Zealand permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 98:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 99:**

Admit that Norway permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 99:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 100:**

Admit that Slovenia permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 100:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 101:**

Admit that South Africa permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 101:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 102:**

Admit that Spain permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 102:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 103:**

Admit that Sweden permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 103:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 104:**

Admit that Switzerland permits openly gay and lesbian service members to enlist and serve in its armed forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 104:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 105:**

Admit that at least 24 countries allow openly gay and lesbian service members of their respective armed forces to serve.

**RESPONSE TO REQUEST FOR ADMISSION NO. 105:**

Defendants object to this Request because the term “openly gay and lesbian” is vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations.

**REQUEST FOR ADMISSION NO. 106:**

Admit that Australia abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on unit cohesion.

**RESPONSE TO REQUEST FOR ADMISSION NO. 106:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department

of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 107:**

Admit that Australia abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on troop morale.

**RESPONSE TO REQUEST FOR ADMISSION NO. 107:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 108:**

Admit that Australia abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on national defense.

**RESPONSE TO REQUEST FOR ADMISSION NO. 108:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 109:**

Admit that Canada abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on unit cohesion.

**RESPONSE TO REQUEST FOR ADMISSION NO. 109:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 110:**

Admit that Canada abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on troop morale.

**RESPONSE TO REQUEST FOR ADMISSION NO. 110:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 111:**

Admit that Canada abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on national defense.

**RESPONSE TO REQUEST FOR ADMISSION NO. 111:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 112:**

Admit that the United Kingdom abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on unit cohesion.

**RESPONSE TO REQUEST FOR ADMISSION NO. 112:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.



**REQUEST FOR ADMISSION NO. 113:**

Admit that the United Kingdom abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on troop morale.

**RESPONSE TO REQUEST FOR ADMISSION NO. 113:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 114:**

Admit that the United Kingdom abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on national defense.

**RESPONSE TO REQUEST FOR ADMISSION NO. 114:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 115:**

Admit that Israel abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on unit cohesion.

**RESPONSE TO REQUEST FOR ADMISSION NO. 115:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 116:**

Admit that Israel abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on troop morale.

**RESPONSE TO REQUEST FOR ADMISSION NO. 116:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 117:**

Admit that Israel abandoned its prohibition of military service by openly gay and lesbian service members without any documented adverse impact on national defense.

**RESPONSE TO REQUEST FOR ADMISSION NO. 117:**

Defendants object to this Request because the term “openly gay and lesbian” “prohibition,” and “documented adverse impact” are vague and ambiguous. Defendants can thus neither admit nor deny this request. To the extent a response is required, Defendants can neither admit nor deny this request. The Department of Defense has not conducted its own independent study of the extent to which service members who engage in homosexual conduct are able to serve in the armed forces of other nations or the impacts of any such service.

**REQUEST FOR ADMISSION NO. 119:**

Admit that since members of the U.S. Armed Forces began fighting side by side with coalition forces from countries that allow lesbian and gay service members to serve openly in their respective militaries, there have been no documented adverse effects arising from the proximity of gay and lesbian coalition soldiers to American soldiers on the unit cohesion or morale of any member or members of the U.S. Armed Forces.

**RESPONSE TO REQUEST FOR ADMISSION NO. 119:**

Defendants object to this Request because it is a compound question that violates the requirement in Fed. R. Civ. P. 36(a)(2) that each matter must be separately stated. Defendants also object to the terms “side by side,” “coalition forces,” “openly,” and “proximity of gay and lesbian coalition soldiers” as vague and ambiguous. To the extent a response is required, Defendants can neither admit nor deny this Request because Defendants do not keep or track data concerning

incidents of American soldiers coming into direct contact with foreign soldiers who engage in homosexual conduct.