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17 **United States District Court**
Eastern District of California
18 **Sacramento Division**

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| 19 PROTECTMARRIAGE.COM, et al., | Case No. 2:09-CV-00058-MCE-DAD |
| 20 Plaintiffs, | ProtectMarriage.com-Yes on 8, a Project of California Renewal's Response to Attorney General's First Set of Interrogatories |
| 21 vs. | |
| 22 DEBRA BOWEN, et al., | Judge Morrison C. England, Jr. |
| 23 Defendants. | |
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1 Plaintiff ProtectMarriage.com—Yes on 8, a Project of California Renewal
2 (“ProtectMarriage.com”), hereby responds to the Attorney General’s First Set of Interrogatories
3 as follows:

4 **Responses to Requests**

5 **Special Interrogatory No. 1:** State all facts, other than facts described in Doe declarations filed
6 in this action, supporting your contention, at Paragraph 36 of the Third Amended Complaint, that
7 “Plaintiffs and other supporters of Proposition 8 have been subjected to threats, harassment, and
8 reprisals as a result of their support for Proposition 8 and a traditional definition of marriage.”

9 **Objections:**

10 **A. First Amendment Privilege.** In *Buckley v. Valeo*, the Supreme Court created the
11 reasonable probability test in response to, and in rejection of, the argument that the proof of a
12 chill on expressive association would be impossible. 424 U.S. 1, 73 (1976). In the *Buckley*
13 appellate court, a dissenting opinion noted the difficulty of obtaining “witnesses who are too
14 fearful to contribute but not too fearful to testify about their fear.” *Id.* at 74. Noting this concern,
15 the Supreme Court established the reasonable probability test, which included a mandate that
16 courts allow “sufficient flexibility” in evidence to fit the situation where witnesses are difficult to
17 obtain because they are chilled by fear of threats, harassment, or reprisals. *Id.* Under the
18 reasonable probability test, the court must determine whether there is a “reasonable probability
19 that the compelled disclosure of a party’s contributors’ names will subject them to threats,
20 harassment, or reprisals from either Government officials or private parties.” *McConnell v. FEC*,
21 540 U.S. 93, 198 (2003) (citation omitted). Here, Plaintiffs have alleged just such threats,
22 harassment, and reprisals, and have provided numerous declarations in support of that.

23 This interrogatory seeks to compel disclosure of speech involving an advocacy association
24 during an election on a ballot measure—speech that “is at the heart of the First Amendment’s
25 protection,” and “the type of speech indispensable to decisionmaking in a democracy.” *First*
26 *National Bank of Boston v. Bellotti*, 435 U.S. 765, 776 (1978). As the U.S. Court of Appeals for
27 the Ninth Circuit recently held, “[t]he freedom to associate with others for the common
28 advancement of political beliefs and ideas lies at the heart of the First Amendment. Where, as

1 here, discovery would have the practical effect of discouraging the exercise of First Amendment
2 associational rights, the party seeking such discovery must demonstrate a need for the
3 information sufficient to outweigh the impact on those rights.” *Perry v. Schwarzenegger*, 591
4 F.3d 1147, 1152 (9th Cir. 2010).

5 Thus, ProtectMarriage.com objects to this Interrogatory to the extent that it seeks
6 information protected from disclosure by the First Amendment. See *DeGregory v. Attorney*
7 *General of the State of New Hampshire*, 383 U.S. 825, 829 (1966). This interrogatory calls for a
8 response that reflects core First Amendment activity—e.g., political views, legislative and
9 political strategy, religious beliefs, voter intent, political speech, and associational activity—and
10 is not an appropriate subject of discovery and is protected from disclosure. See, e.g., *Dole v.*
11 *Service Employees Union, AFL-CIO, Local 280*, 950 F.2d 1456, 1459 (9th Cir. 1991).
12 Specifically, this Interrogatory calls for information on individuals who asserted their First
13 Amendment right to speak and confidentially associate with a political advocacy group to further
14 a political belief. To the extent individuals who have associated with ProtectMarriage.com have
15 been willing to publicly come forward, these individuals have submitted declarations in this case
16 in support of Plaintiffs. However, to the extent that individuals have not been willing to publicly
17 come forward, Plaintiffs have not, and will not, produce information on those individuals.¹

18 **B. Other Objections.** ProtectMarriage.com further objects to this interrogatory to the extent
19 that the information it seeks requires a response regarding (a) litigation strategy and trial
20 preparation; (b) information that is protected by the attorney-client privilege; (c) disclosure of the
21 mental impressions, conclusions, opinions, or legal theories of any attorneys involved in this
22 litigation; (d) information prepared in anticipation of litigation; (e) ProtectMarriage.com to
23 produce information from entities/individuals who are not uniquely within

24 _____
25 ¹ ProtectMarriage.com further objects to this Interrogatory to the extent that the information
26 it requests may be prevented from disclosure by the ongoing case of *Doe #1 v. Reed*, U.S.
27 Supreme Court Case No. 09-0559, which is currently being briefed at the Supreme Court of the
28 United States, is set for oral argument on April 28, 2010 and may be dispositive on the issues
regarding the extent of the reasonable probability test and what information ProtectMarriage.com
must provide here. Specifically, this case deals with the extent to which individuals who have not
contributed to a campaign may be publicly disclosed.

1 ProtectMarriage.com's custody and control; or (f) information otherwise protected from
2 disclosure under applicable privileges, immunities, laws, or rules.

3 By responding to this interrogatory, ProtectMarriage.com does not concede that the
4 information requested is relevant to a claim or defense on the subject matter of this action, or is
5 admissible at the trial thereof. ProtectMarriage.com reserves any and all objections as to
6 competency, relevance, materiality, privilege, admissibility, or any other grounds on which an
7 objection may be made. ProtectMarriage.com expressly reserves the right to object to further
8 discovery into the subject matter of these requests.

9 **Response:** Subject to the objections above and without waiving further objection,
10 ProtectMarriage.com responds as follows:

11 I would estimate that, on a personal level, I have heard from approximately fifty individuals
12 who, in confidence, told me about the various forms of threats, harassment, and reprisals to
13 which they were subject because of their support for Proposition 8 and a traditional definition of
14 marriage. The majority of these individuals contacted me via email, though approximately ten
15 contacted me via telephone and several others recounted the threats, harassment, and reprisals to
16 which they had been subject in person.

17 ProtectMarriage.com has heard from approximately 500 individuals who, in confidence, told
18 ProtectMarriage.com about the various forms of threats, harassment, and reprisals to which they
19 were subject because of their support for Proposition 8 and a traditional definition of marriage.
20 Almost all of these individuals contacted ProtectMarriage.com via email.

21 Those few individuals who have been willing to come forward publicly with information on
22 the threats, harassment, and reprisals that they suffered have submitted declarations in this case.
23 However, if an individual has not wanted to publicly identify himself or herself as having
24 suffered threats, harassment, and reprisals, ProtectMarriage.com has considered that information
25 confidential and has not, and will not, produce information on those individuals.

26 **Special Interrogatory No. 2:** IDENTIFY any and all persons with personal knowledge of the
27 facts provided in response to Special Interrogatory No. 1.

28 **Objections:**

1 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
2 No. 1.

3 **Response:** Subject to the objections above and without waiving further objection,
4 ProtectMarriage.com responds as follows:

5 I, Ron Prentice, have personal knowledge of the response provided to Interrogatory No. 1,
6 and can be contacted through Bopp, Coleson and Bostrom. Ann Malane, from
7 ProtectMarriage.com, may also have similar knowledge.

8 In addition, the following groups and individuals may have knowledge of this response:
9 Schubert Flint Public Affairs, 1415 L Street, Suite 1250, Sacramento, CA 95814, Phone: (916)
10 448-4234, collected incidents of threats, harassment, and reprisals directed at supporters of
11 Proposition 8 and a traditional definition of marriage.

12 Several other individuals may have further information on incidents of threats, harassment,
13 and reprisals directed at supporters of Proposition 8 and a traditional definition of marriage:

14 Ned Dolesji
15 Executive Director - California Catholic Conference
16 1119 K Street - Second Floor
17 Sacramento, CA 95814

18 Bill May
19 Catholics for the Common Good
20 415-651-4171

21 Everett Rice
22 Legislative Coordinator - California Family Council
23 1107 9th Street - Suite 710
24 Sacramento, CA 95814

25 Andrew P. Pugno
26 101 Parkshore Drive, Suite 100
27 Folsom, CA 95630
28 916-608-3065

Mark Jansson

Special Interrogatory No. 3: State all facts, other than facts described in Doe declarations filed
in this action, supporting your contentions, at Paragraph 37 of the Third Amended Complaint,
regarding "threats and harassment [that] have included threatening phone calls, emails, and
postcards."

1 **Objections:**

2 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
3 No. 1.

4 **Response:** Subject to the objections above and without waiving further objections,
5 ProtectMarriage.com responds as follows:

6 As set forth in my response to Interrogatory No. 1, I have personally heard from many
7 donors and supporters who have not submitted declarations in this case, but who were subject to
8 threatening phone calls, emails, and mailings because of their support for Proposition 8 and a
9 traditional definition of marriage. ProtectMarriage.com as an organization also heard from many
10 donors and supporters who have not submitted declarations in this case, but who were subject to
11 threatening phone calls, emails, and mailings because of their support for Proposition 8 and a
12 traditional definition of marriage.

13 Additionally, ProtectMarriage.com as an entity received threatening phone calls, emails, and
14 mailings. To the extent that ProtectMarriage.com retains these items in our possession, we are in
15 the process of turning these items over to our attorneys.

16 However, if an individual has not wanted to publicly identify himself or herself as having
17 suffered threats, harassment, and reprisals, ProtectMarriage.com has considered that information
18 confidential and has not, and will not, produce information on those individuals.

19 **Special Interrogatory No. 4: IDENTIFY** any and all persons with personal knowledge of the
20 facts provided in response to Special Interrogatory No. 3.

21 **Objections:**

22 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
23 No. 1.

24 **Response:**

25 See Response to Interrogatory No. 2.

26 **Special Interrogatory No. 5: State** all facts, other than facts described in Doe declarations filed
27 in this action, supporting your contention, at Paragraph 38 of the Third Amended Complaint, that
28 “[s]upporters of Proposition 8 have also had their personal property vandalized or destroyed.”

1 **Objections:**

2 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
3 No. 1.

4 **Response:** Subject to the objections above and without waiving further objections,
5 ProtectMarriage.com responds as follows:

6 As set forth in the response to Interrogatory No. 1, ProtectMarriage.com has heard from
7 many donors and supporters who have not submitted declarations in this case, but who were
8 subject to various forms of threats, harassment and reprisals because of their support for
9 Proposition 8 and a traditional definition of marriage. To the extent that individuals who did have
10 their personal property vandalized or destroyed were willing to publicly come forward, we have
11 had those individuals submit declarations in this case.

12 I was not subject to having my personal property vandalized or destroyed. As far as I am
13 aware, ProtectMarriage.com was not subject to having its property vandalized or destroyed,
14 although it received threats that its property would be vandalized or destroyed. To the extent that
15 we retain these items in our possession, we are in the process of turning these items over to our
16 attorneys.

17 However, if an individual has not wanted to publicly identify himself or herself as having
18 suffered threats, harassment, and reprisals, ProtectMarriage.com has considered that information
19 confidential and has not, and will not, produce information on those individuals.

20 **Special Interrogatory No. 6:** IDENTIFY any and all persons with personal knowledge of the
21 facts provided in your response to Special Interrogatory No. 5.

22 **Objections:**

23 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
24 No. 1.

25 **Response:**

26 See Response to Interrogatory No. 2.

27 **Special Interrogatory No. 7:** State all facts, other than facts described in Doe declarations filed
28 in this action, supporting your contention, at Paragraph 39 of the Third Amended Complaint, that

1 “[s]upporters of Proposition 8 have also received envelopes containing a white powdery
2 substance.”

3 **Objections:**

4 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
5 No. 1.

6 **Response:**

7 Subject to the objections above and without waiving further objections,
8 ProtectMarriage.com responds as follows: Through traditional media, I heard reports that the
9 Knights of Columbus and several LDS Temples had received envelopes containing a white,
10 powdery substance.

11 **Special Interrogatory No. 8: IDENTIFY** any and all persons with personal knowledge of the
12 facts provided in response to Special Interrogatory No. 7.

13 **Objections:**

14 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
15 No. 1.

16 **Response:**

17 See Response to Interrogatory No. 2.

18 **Special Interrogatory No. 9: State** all facts, other than facts described in Doe declarations filed
19 in this action, supporting your contention, at Paragraph 40 of the Third Amended Complaint, that
20 “threats and harassment have extended into the work lives of the supporters of Proposition 8.”

21 **Objections:**

22 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
23 No. 1.

24 **Response:** Subject to the objections above and without waiving further objections,

25 ProtectMarriage.com responds as follows:

26 I personally heard from several donors and supporters who have not submitted declarations
27 in this case, but who were subject to threats and harassment at work because of their support for
28 Proposition 8 and a traditional definition of marriage. Some of these individuals feared that their

1 support would cost them their jobs.

2 ProtectMarriage.com as an organization also heard from many donors and supporters who
3 have not submitted declarations in this case, but who were similarly subject to threats and
4 harassment at work because of their support for Proposition 8 and a traditional definition of
5 marriage, and who feared that their support would cost them their jobs.

6 To the extent that individuals were willing to come forward publicly with this information,
7 they have submitted declarations in this case. However, if an individual has not wanted to
8 publicly identify himself or herself as having suffered threats, harassment, and reprisals,
9 ProtectMarriage.com has considered that information confidential and has not, and will not,
10 produce information on those individuals.

11 **Special Interrogatory No. 10:** IDENTIFY any and all persons with personal knowledge of the
12 facts provided in response to Special Interrogatory No. 9.

13 **Objections:**

14 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
15 No. 1.

16 **Response:**

17 See Response to Interrogatory No. 2.

18 **Special Interrogatory No. 11:** State all facts, other than facts described in Doe declarations filed
19 in this action, supporting your contention, at Paragraph 41 of the Third Amended Complaint, that
20 “[b]usinesses, whether or not they have contributed to either side of the Proposition 8 campaign,
21 have been blacklisted because people who worked at those businesses supported Proposition 8.”

22 **Objections:**

23 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
24 No. 1.

25 **Response:** Subject to the objections above and without waiving further objections,
26 ProtectMarriage.com responds as follows:

27 As set forth in the response to Interrogatory No. 1, ProtectMarriage.com has heard from
28 many donors and supporters who have not submitted declarations in this case, but who were

1 subject to various forms of threats, harassment and reprisals because of their support for
2 Proposition 8 and a traditional definition of marriage.

3 **Special Interrogatory No. 12:** IDENTIFY any and all persons with personal knowledge of the
4 facts provided in response to Special Interrogatory No. 11.

5 **Objections:**

6 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
7 No. 1.

8 **Response:**

9 See Response to Interrogatory No. 2.

10 **Special Interrogatory No. 13:** State all facts, other than facts described in Doe declarations filed
11 in this action, supporting your contention, at Paragraph 42 of the Third Amended Complaint, that
12 “[s]everal donors have indicated that they will not contribute to Ballot Committee Plaintiffs or
13 similar organizations in the future because of the threats and harassment directed at them as a
14 result of their contributions to Ballot Committee Plaintiffs and the public disclosure of that fact.”

15 **Objections:**

16 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
17 No. 1.

18 **Response:** Subject to the objections above and without waiving further objections,

19 ProtectMarriage.com responds as follows:

20 Many donors and potential donors and potential donors to ProtectMarriage.com asked me or
21 others at ProtectMarriage.com what amount of money they could give to ProtectMarriage.com
22 before their personal information and donation information would be subject to public disclosure.

23 Other potential donors indicated to me or others at ProtectMarriage.com that they refused to
24 donate because of the inability to keep their personal information and donation information from
25 being publically disclosed. These donors and potential donors gave or refused to give because
26 they felt that the public disclosure of their personal information and donation information would
27 subject them to threats and harassment.

28 To the extent that individuals were willing to come forward publicly with this information,

1 they have submitted declarations.

2 **Special Interrogatory No. 14:** IDENTIFY any and all persons with personal knowledge of the
3 facts provided in response to Special Interrogatory No. 13.

4 **Objections:**

5 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
6 No. 1.

7 **Response:** Subject to the objections above and without waiving further objection,
8 ProtectMarriage.com responds as follows: I, Ron Prentice, have personal knowledge of the
9 response provided to Interrogatory No. 13. Other individuals who worked with
10 ProtectMarriage.com during the campaign on Proposition 8 or since the campaign may also have
11 discussed the amount individuals could donate and remain below the threshold for disclosure.

12 **Special Interrogatory No. 15:** State all facts, other than facts described in Doe declarations filed
13 in this action, supporting your contention, at Paragraph 42 of the Third Amended Complaint, that
14 “there is significant evidence that, because of the disclosure of their names, donations to groups
15 supporting the passage of Proposition 8 led directly to those donors being singled out for threats,
16 harassment, and reprisals.”

17 **Objections:**

18 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
19 No. 1.

20 **Response:** Subject to the objections above and without waiving further objections,
21 ProtectMarriage.com responds as follows:

22 I have personally heard from many donors and supporters who have not submitted
23 declarations in this case, but who told me that their donations to ProtectMarriage.com were
24 referenced when they were threatened or harassed.

25 Other individuals who have not submitted declarations in this case, have told others at
26 ProtectMarriage.com that their donations to ProtectMarriage.com were referenced when they
27 were threatened or harassed.

28 To the extent that individuals were willing to come forward publicly with this information,

1 they have submitted declarations.

2 **Special Interrogatory No. 16:** IDENTIFY any and all persons with personal knowledge of the
3 facts provided in response to Special Interrogatory No. 15.

4 **Objections:**

5 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
6 No. 1.

7 **Response:**

8 See Response to Interrogatory No. 2.

9 **Special Interrogatory No. 17:** State all facts, other than facts described in Doe declarations filed
10 in this action, supporting your contention, at Paragraph 45 of the Third Amended Complaint, that
11 "Committee Plaintiffs believe potential contributors have been and will continue to be
12 discouraged from contributing to their committees as a result of the threats and harassment
13 directed at any individual supporting a traditional definition of marriage."

14 **Objections:**

15 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
16 No. 1.

17 **Response:** Subject to the objections above and without waiving further objections,
18 ProtectMarriage.com responds as follows:

19 Since the November 2008 election, potential donors have personally indicated to me that
20 they refuse to donate because of the possibility of threats, harassment, and reprisals that they fear
21 if their names are publicly disclosed. Others have relayed this same information to others at
22 ProtectMarriage.com.

23 To the extent that individuals were willing to come forward publicly with this information,
24 they have submitted declarations.

25 **Special Interrogatory No. 18:** IDENTIFY any and all persons with personal knowledge of the
26 facts provided in response to Special Interrogatory No. 17.

27 **Objections:**

28 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory

1 No. 1.

2 **Response:** Subject to the objections above and without waiving further objection,
3 ProtectMarriage.com responds as follows: I, Ron Prentice, have personal knowledge of the
4 response provided to Interrogatory No. 17.

5 **Special Interrogatory No. 19:** State all facts, other than facts described in Doe declarations filed
6 in this action, supporting your contention, at Paragraph 46 of the Third Amended Complaint, that
7 “[t]he continued availability of Ballot Committee Plaintiffs’ and Major Donors’ previously filed
8 reports create the reasonable probability that supporters of Proposition 8 and other individuals or
9 organizations supporting a traditional definition of marriage will be subjected to continued
10 harassment for exercising their First Amendment rights.”

11 **Objections:**

12 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
13 No. 1.

14 **Response:** Subject to the objections above and without waiving further objections,
15 ProtectMarriage.com responds as follows:

16 Although supporters of traditional marriage are currently not subject to the same level of
17 threats and harassment as they were subject to immediately before and after the Proposition 8
18 election in November 2008, threats and harassment remain ongoing. Either personally or through
19 ProtectMarriage.com, I would estimate that about once a week, we continue to hear about threats,
20 harassment, and reprisals directed at individuals who supported Proposition 8 and whose names
21 remain available on the internet as campaign donors.

22 **Special Interrogatory No. 20:** IDENTIFY any and all persons with personal knowledge of the
23 facts provided in response to Special Interrogatory No. 19.

24 **Objections:**

25 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
26 No. 1.

27 **Response:**

28 See Response to Interrogatory No. 2.

1 **Special Interrogatory No. 21:** State all facts, other than facts described in Doe declarations filed
2 in this action, supporting your contention, at Paragraph 47 of the Third Amended Complaint, that
3 “[c]ompliance with the PRA’s post-election reporting requirements creates a reasonable
4 probability that those individuals and organizations that made contributions or received
5 expenditures in support of Proposition 8 or to organizations that support a traditional definition
6 of marriage will be subject to the same level of threats, harassment, and reprisals set forth
7 above.”

8 **Objections:**

9 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
10 No. 1.

11 **Response:** See Response to Special Interrogatory No. 19.

12 **Special Interrogatory No. 22:** IDENTIFY any and all persons with personal knowledge of the
13 facts provided in response to Special Interrogatory No. 21.

14 **Objections:**

15 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
16 No. 1.

17 **Response:**

18 Subject to the objections above and without waiving further objection, ProtectMarriage.com
19 responds as follows: I, Ron Prentice, have personal knowledge of the response provided to
20 Interrogatory No. 21.

21 **Special Interrogatory No. 23:** State all facts, other than facts described in Doe declarations filed
22 in this action, supporting your contention, at Paragraph 48 of the Third Amended Complaint, that
23 “Plaintiffs have suffered, or will suffer, irreparable harm if the requested relief is not granted.”

24 **Objections:**

25 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
26 No. 1.

27 Further, to the extent that the Ninth Circuit has ruled that irreparable harm is presumed in the
28 context of the First Amendment, this Interrogatory calls for a legal conclusion. *See Sammartano*

1 *v. First Judicial District Court, in and for County of Carson City*, 303 F.3d 959, 973 (9th Cir.
2 2002).

3 **Response:** Subject to the objections above and without waiving further objections,
4 ProtectMarriage.com responds as follows:

5 As set forth above in response to Interrogatory No. 13, many donors and potential donors
6 and potential donors to ProtectMarriage.com asked what amount of money they could give to
7 ProtectMarriage.com before their personal information and donation information would be
8 subject to public disclosure. Many potential donors refused to donate because of the inability to
9 keep their personal information and donation information from being publically disclosed. These
10 donors and potential donors gave or refused to give because they felt that the public disclosure of
11 their personal information and donation information would subject them to threats and
12 harassment. This failure to donate, in combination with the individuals who donate below the
13 reporting threshold but would have given more if they were not subject to public disclosure,
14 makes it more difficult to raise money and fund any campaign.

15 **Special Interrogatory No. 24:** IDENTIFY any and all persons with personal knowledge of the
16 facts provided in response to Special Interrogatory No. 23.

17 **Objections:**

18 ProtectMarriage.com re-alleges the objections set forth in response to Special Interrogatory
19 Nos. 1 and 23.


20 **Response:** Subject to the objections above and without waiving further objection,
21 ProtectMarriage.com responds as follows: I, Ron Prentice, have personal knowledge of the
22 response provided to Interrogatory No. 23.

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1 Dated this 15th day of March, 2010.

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Signed:

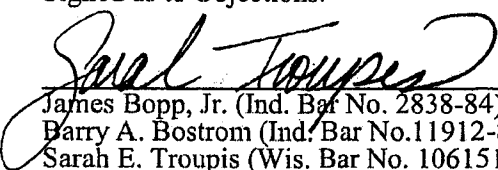


Ron Prentice
On behalf of ProtectMarriage.com - Yes on
8, a Project of California Renewal

Signed as to Objections:

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SACRAMENTO OFFICE
ATTORNEY GENERAL
ProtectMarriage.com's Resp. to
A.G.'s First Set of Interrogatories