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16
17 **United States District Court**
Eastern District of California
18 **Sacramento Division**

19 PROTECTMARRIAGE.COM, et al., 20 Plaintiffs, 21 vs. 22 DEBRA BOWEN, et al., 23 Defendants. 24	Case No. 2:09-CV-00058-MCE-DAD Responses of National Organization for Marriage California - Yes on 8, Sponsored by National Organization for Marriage and National Organization for Marriage California PAC to Attorney General's First Set of Interrogatories Judge Morrison C. England, Jr.
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1 Plaintiffs National Organization for Marriage California - Yes on 8, Sponsored by National
2 Organization for Marriage (“NOM California”) and National Organization for Marriage
3 California PAC (“NOM California PAC”), hereby respond to the Attorney General’s First Set of
4 Interrogatories as follows:

5 **Responses to Requests**

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

10 **Objections:**

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

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

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

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

20 **B. Other Objections.** NOM California and NOM California PAC further object to this
21 interrogatory to the extent that the information it seeks requires a response regarding (a) litigation
22 strategy and trial preparation; (b) information that is protected by the attorney-client privilege; (c)
23

24 ¹ NOM California and NOM California PAC further objects to this Interrogatory to the
25 extent that the information it requests may be prevented from disclosure by the ongoing case of
26 *Doe #1 v. Reed*, U.S. Supreme Court Case No. 09-0559, which is currently being briefed at the
27 Supreme Court of the United States, is set for oral argument on April 28, 2010 and may be
28 dispositive on the issues regarding the extent of the reasonable probability test and what
information NOM California and NOM California PAC 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 disclosure of the mental impressions, conclusions, opinions, or legal theories of any attorneys
2 involved in this litigation; (d) information prepared in anticipation of litigation; (e) NOM
3 California and NOM California PAC to produce information from entities/individuals who are
4 not uniquely within NOM California and NOM California PAC's custody and control; or (f)
5 information otherwise protected from disclosure under applicable privileges, immunities, laws,
6 or rules.

7 By responding to this interrogatory, NOM California and NOM California PAC do not
8 concede that the information requested is relevant to a claim or defense on the subject matter of
9 this action, or is admissible at the trial thereof. NOM California and NOM California PAC
10 reserve any and all objections as to competency, relevance, materiality, privilege, admissibility,
11 or any other grounds on which an objection may be made. NOM California and NOM California
12 PAC expressly reserve the right to object to further discovery into the subject matter of these
13 requests.

14 **Response:** Subject to the objections above and without waiving further objection, NOM
15 California and NOM California PAC respond as follows:

16 I would estimate that, on a personal level, I have heard from approximately one hundred
17 individuals who, in confidence, told me about the various forms of threats, harassment, and
18 reprisals to which they were subject because of their support for Proposition 8 and a traditional
19 definition of marriage. Not all of these individuals were donors to NOM California or NOM
20 California PAC.

21 The majority of these individuals contacted me via telephone. Sometimes, individuals who
22 had been subject to threats, harassment, and reprisals spoke to me in person about what had
23 happened to them. I also received emails from some individuals who had been subject to threats,
24 harassment, and reprisals.

25 As organizations, NOM California and NOM California PAC have heard from
26 approximately 200 individuals who, in confidence, told NOM California or NOM California
27 PAC about the various forms of threats, harassment, and reprisals to which they were subject
28 because of their support for Proposition 8 and a traditional definition of marriage. Like those who

1 I personally communicated with about the threats, harassment, and reprisals, most of these
2 individuals contacted NOM California and NOM California PAC over the phone, though some
3 contacted NOM California and NOM California PAC through email or in person.

4 Those few individuals who have been willing to come forward publicly with information on
5 the threats, harassment, and reprisals that they suffered have submitted declarations in this case.
6 However, if an individual has not wanted to publicly identify himself or herself as having
7 suffered threats, harassment, and reprisals, NOM California and NOM California PAC have
8 considered that information confidential and have not, and will not, produce information on those
9 individuals.

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

12 **Objections:**

13 NOM California and NOM California PAC re-allege the objections set forth in response to
14 Special Interrogatory No. 1.

15 **Response:** Subject to the objections above and without waiving further objection, NOM
16 California and NOM California PAC respond as follows:

17 I, Brian Brown, have personal knowledge of the response provided to Interrogatory No. 1,
18 and can be contacted through Bopp, Coleson and Bostrom. Maggie Gallagher, the President of
19 National Organization for Marriage, as well as the staff at National Organization for Marriage,
20 may also have similar knowledge.

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

25 **Objections:**

26 NOM California and NOM California PAC re-allege the objections set forth in response to
27 Special Interrogatory No. 1.

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

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1 California and NOM California PAC respond as follows:

2 On a personal level, and at the offices of NOM California and NOM California PAC, we
3 have received approximately 50 threatening or harassing phone calls, emails, or mailings. Our
4 president, Maggie Gallagher, has also received similar threatening or harassing phone calls,
5 emails, and mailings. To the extent that NOM California and NOM California PAC retain these
6 items in our possession, we are in the process of turning these items over to our attorneys.

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

14 However, if an individual has not wanted to publicly identify himself or herself as having
15 suffered threats, harassment, and reprisals, NOM California and NOM California PAC have
16 considered that information confidential and have not, and will not, produce information on those
17 individuals.

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

20 **Objections:**

21 NOM California and NOM California PAC re-allege the objections set forth in response to
22 Special Interrogatory No. 1.

23 **Response:**

24 See Response to Interrogatory No. 2.

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

28 **Objections:**

1 NOM California and NOM California PAC re-allege the objections set forth in response to
2 Special Interrogatory No. 1.

3 **Response:** Subject to the objections above and without waiving further objections, NOM
4 California and NOM California PAC respond as follows:

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

11 @I was personally subject to physical violence for my support of Proposition 8. @Incident
12 information.

13 As far as I am aware, NOM California and NOM California PAC were not subject to having
14 their property vandalized or destroyed, although we received threats that our property would be
15 vandalized or destroyed. We turned such threats over to the police. To the extent that we retain
16 these items in our possession, we are in the process of turning these items over to our attorneys.

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

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

23 **Objections:**

24 NOM California and NOM California PAC re-allege the objections set forth in response to
25 Special Interrogatory No. 1.

26 **Response:**

27 See Response to Interrogatory No. 2.

28 **Special Interrogatory No. 7:** State all facts, other than facts described in Doe declarations filed

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1 in this action, supporting your contention, at Paragraph 39 of the Third Amended Complaint, that
2 “[s]upporters of Proposition 8 have also received envelopes containing a white powdery
3 substance.”

4 **Objections:**

5 NOM California and NOM California PAC re-allege the objections set forth in response to
6 Special Interrogatory No. 1.

7 **Response:**

8 Subject to the objections above and without waiving further objections, NOM California and
9 NOM California PAC respond as follows:

10 Through traditional media, I heard reports that the Knights of Columbus and several LDS
11 Temples had received envelopes containing a white, powdery substance.

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

14 **Objections:**

15 NOM California and NOM California PAC re-allege the objections set forth in response to
16 Special Interrogatory No. 1.

17 **Response:**

18 See Response to Interrogatory No. 2.

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

22 **Objections:**

23 NOM California and NOM California PAC re-allege the objections set forth in response to
24 Special Interrogatory No. 1.

25 **Response:** Subject to the objections above and without waiving further objections, NOM
26 California and NOM California PAC respond as follows:

27 I personally heard from about 5-10 donors and supporters who have not submitted
28 declarations in this case, but who were subject to threats and harassment at work because of their

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1 support for Proposition 8 and a traditional definition of marriage. Some of these individuals
2 feared that their support would cost them their jobs. NOM California and NOM California PAC
3 have heard from about 20-30 individuals who were subject to threats and harassment at work or
4 who feared that their support would cost them their jobs.

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

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

12 **Objections:**

13 NOM California and NOM California PAC re-allege the objections set forth in response to
14 Special Interrogatory No. 1.

15 **Response:**

16 See Response to Interrogatory No. 2.

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

21 **Objections:**

22 NOM California and NOM California PAC re-allege the objections set forth in response to
23 Special Interrogatory No. 1.

24 **Response:** Subject to the objections above and without waiving further objections, NOM
25 California and NOM California PAC respond as follows:

26 Many of the individuals who have contacted me personally, as well as NOM California and
27 NOM California PAC, to detail the threats, harassment, and reprisals to which they were subject
28 had found their names listed on various websites purporting to blacklist supporters of Proposition

1 8 and a traditional definition of marriage.

2 To the extent that individuals were willing to come forward publicly with this information,
3 they have submitted declarations in this case. However, if an individual has not wanted to
4 publicly identify himself or herself as having suffered threats, harassment, and reprisals, NOM
5 California and NOM California PAC have considered that information confidential and have
6 not, and will not, produce information on those individuals.

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

9 **Objections:**

10 NOM California and NOM California PAC re-allege the objections set forth in response to
11 Special Interrogatory No. 1.

12 **Response:**

13 See Response to Interrogatory No. 2.

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

19 **Objections:**

20 NOM California and NOM California PAC re-allege the objections set forth in response to
21 Special Interrogatory No. 1.

22 **Response:** Subject to the objections above and without waiving further objections, NOM
23 California and NOM California PAC responds as follows:

24 Many donors and potential donors to NOM California and NOM California PAC have
25 relayed their concerns to NOM California and NOM California PAC and me about donating to
26 NOM California and NOM California PAC because of the potential of threats and harassment
27 they may be subject to because of their donations. Many indicated that, if their names would be
28 disclosed, they would not donate to either NOM California and NOM California PAC. I would

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1 estimate that I have talked to approximately 10 individuals who have expressed this opinion to
2 me; NOM California and NOM California PAC would have spoken to more.

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

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

10 **Objections:**

11 NOM California and NOM California PAC re-allege the objections set forth in response to
12 Special Interrogatory No. 1.

13 **Response:**

14 See Response to Special Interrogatory No. 2.

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

20 **Objections:**

21 NOM California and NOM California PAC re-allege the objections set forth in response to
22 Special Interrogatory No. 1.

23 **Response:** Subject to the objections above and without waiving further objections, NOM
24 California and NOM California PAC respond as follows:

25 Of the individuals I have personally spoken to regarding threats, harassment, and reprisals
26 for support of Proposition 8, the majority of those individuals can directly tie the threats,
27 harassment, and reprisals to their donation. Many others who cannot directly tie the threats,
28 harassment, and reprisals to their donation suspect that it is the reason behind the threats,

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1 harassment, and reprisals.

2 To the extent that individuals were willing to come forward publicly with this information,
3 they have submitted declarations in this case. However, if an individual has not wanted to
4 publicly identify himself or herself as having suffered threats, harassment, and reprisals, NOM
5 California and NOM California PAC have considered that information confidential and have
6 not, and will not, produce information on those individuals.

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

9 **Objections:**

10 NOM California and NOM California PAC re-allege the objections set forth in response to
11 Special Interrogatory No. 1.

12 **Response:**

13 See Response to Interrogatory No. 2.

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

19 **Objections:**

20 NOM California and NOM California PAC re-allege the objections set forth in response to
21 Special Interrogatory No. 1.

22 **Response:** Subject to the objections above and without waiving further objections, NOM
23 California and NOM California PAC respond as follows:

24 Since the November 2008 election on Proposition 8, several potential donors have
25 personally indicated to me that they will only donate to a cause supporting traditional marriage if
26 they are able to keep their personal information private, because of the possibility of threats,
27 harassment, and reprisals that they fear if their names are publicly disclosed. Others have relayed
28 this same information to others at NOM California and NOM California PAC.

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

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

5 **Objections:**

6 NOM California and NOM California PAC re-allege the objections set forth in response to
7 Special Interrogatory No. 1.

8 **Response:**

9 See Response to Interrogatory No. 2.

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

16 **Objections:**

17 NOM California and NOM California PAC re-allege the objections set forth in response to
18 Special Interrogatory No. 1.

19 **Response:** Subject to the objections above and without waiving further objections, NOM
20 California and NOM California PAC respond as follows:

21 Although supporters of traditional marriage are currently not subject to the same level of
22 threats and harassment as they were subject to immediately before and after the Proposition 8
23 election in November 2008, threats and harassment remain ongoing. Either personally or through
24 NOM California and NOM California PAC, every few weeks, we hear about another incident of
25 threats, harassment, and reprisals directed at individuals who supported Proposition 8 and whose
26 names remain available on the internet as campaign donors.

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

1 **Objections:**

2 NOM California and NOM California PAC re-allege the objections set forth in response to
3 Special Interrogatory No. 1.

4 **Response:**

5 See Response to Interrogatory No. 2.

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

13 **Objections:**

14 NOM California and NOM California PAC re-allege the objections set forth in response to
15 Special Interrogatory No. 1.

16 **Response:**

17 See Response to Special Interrogatory No. 19.

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

20 **Objections:**

21 NOM California and NOM California PAC re-allege the objections set forth in response to
22 Special Interrogatory No. 1.

23 **Response:**

24 See Response to Interrogatory No. 2.

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

28 **Objections:**

1 NOM California and NOM California PAC re-alleges the objections set forth in response to
2 Special Interrogatory No. 1.

3 Further, to the extent that the Ninth Circuit has ruled that irreparable harm is presumed in the
4 context of the First Amendment, this Interrogatory calls for a legal conclusion. *See Sammartano*
5 *v. First Judicial District Court, in and for County of Carson City*, 303 F.3d 959, 973 (9th Cir.
6 2002).

7 **Response:** Subject to the objections above and without waiving further objections, NOM
8 California and NOM California PAC responds as follows:

9 As set forth above in response to Interrogatory No. 13, many donors and potential donors to
10 NOM California and NOM California PAC have relayed their concerns to NOM California and
11 NOM California PAC and me about donating to NOM California and NOM California PAC
12 because of the potential of threats and harassment they may be subject to because of their
13 donations. Many indicated that, if their names would be disclosed, they would not donate to
14 either NOM California nor NOM California PAC. This failure to donate, in combination with the
15 individuals who donate below the reporting threshold but would have given more if they were
16 not subject to public disclosure, makes it more difficult to raise money and fund any campaign.

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

19 **Objections:**

20 NOM California and NOM California PAC re-alleges the objections set forth in response to
21 Special Interrogatory Nos. 1 and 23.

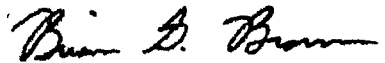
22 **Response:**

23 See Response to Interrogatory No. 2.
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1 Dated this 26 day of February, 2010.

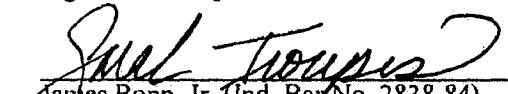
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Signed:



Brian Brown
On behalf of National Organization for
Marriage California - Yes on 8, Sponsored
by National Organization for Marriage and
National Organization for Marriage
California PAC

Signed as to Objections:



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