

# Exhibit F

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15 **UNITED STATES DISTRICT COURT**  
16 **NORTHERN DISTRICT OF CALIFORNIA**

17 KRISTIN M. PERRY, SANDRA B. STIER,  
PAUL T. KATAMI, and JEFFREY J.  
18 ZARRILLO,

19 Plaintiffs,

20 v.

21 ARNOLD SCHWARZENEGGER, in his official  
capacity as Governor of California; EDMUND  
22 G. BROWN, JR., in his official capacity as  
Attorney General of California; MARK B.  
23 HORTON, in his official capacity as Director of  
the California Department of Public Health and  
24 State Registrar of Vital Statistics; LINETTE  
SCOTT, in her official capacity as Deputy  
25 Director of Health Information & Strategic  
Planning for the California Department of Public  
26 Health; PATRICK O'CONNELL, in his official  
capacity as Clerk-Recorder for the County of  
27 Alameda; and DEAN C. LOGAN, in his official  
capacity as Registrar-Recorder/County Clerk for  
the County of Los Angeles,

28 Defendants.

CASE NO. 09-CV-2292 VRW

**PLAINTIFFS' RESPONSES TO  
DEFENDANT-INTERVENORS  
PROPOSITION 8 PROPONENTS' FIRST  
SET OF REQUESTS FOR ADMISSION**

1 Plaintiffs hereby respond to these Requests for Admission based on their own present state of  
2 recollection, knowledge and belief and information and writings presently available to and located by  
3 Plaintiffs upon reasonable investigation of their records and the public sources identified in the  
4 Requests for Admission (to the extent Plaintiffs can confirm the accuracy and authenticity of the  
5 information contained in such sources). Plaintiffs make these responses and objections without  
6 waiving or intending to waive (1) the right to object on the grounds of competence, relevance,  
7 materiality, privilege or admissibility as evidence for any purpose, to the use of these responses in  
8 any subsequent proceedings or at trial, (2) the right to object on any other ground to any other  
9 discovery concerning the subject matter of these requests for admission, or (3) the right to  
10 supplement or amend these responses. Plaintiffs are continuing the development of facts and legal  
11 issues relating to this case and discovery is now commencing. Plaintiffs reserve the right to modify,  
12 amend, or enlarge their Responses herein with such additional knowledge as is subsequently  
13 discovered or developed.

#### 14 **GENERAL OBJECTIONS**

15 1. Plaintiffs object to each Request for Admission to the extent it purports to impose any  
16 requirement or discovery obligation other than those set forth in the Federal Rules of Civil Procedure,  
17 including Federal Rules of Civil Procedure 36(a) and 26(b)(1), the Civil Local Rules of the Northern  
18 District of California, or any applicable Orders of this Court.

19 2. Plaintiffs object to each Request for Admission to the extent that it seeks information  
20 that is protected by the attorney-client privilege, the work product doctrine, and/or any other  
21 applicable privilege. Such information will not be disclosed. Any inadvertent disclosure of such  
22 information shall not be deemed a waiver of the attorney-client privilege, the attorney work product  
23 doctrine, or any other applicable privilege or immunity.

24 3. Plaintiffs object to each Request for Admission to the extent it is vague, compound, or  
25 unintelligible or otherwise not properly capable of soliciting an affirmative admission.

26 4. Plaintiffs object to each Request for Admission to the extent that it may not be  
27 relevant to any party's claim or defense in this action or seeks information that is not reasonably  
28 calculated to lead to the discovery of admissible evidence.

1           5.       These Responses are made by Plaintiffs without prejudice to their using or relying at  
2 trial on subsequently discovered information or on information omitted from these responses as a  
3 result of good faith oversight, error, or mistake.

4           6.       Plaintiffs' Responses to these Requests for Admission shall neither be deemed to  
5 constitute an admission that any Request is relevant, nor deemed a waiver of any right to object to the  
6 admissibility of any such Request for Admission or Response at any proceeding in this case.

7                           **OBJECTIONS AND RESPONSES TO SPECIFIC REQUESTS**

8           **REQUEST FOR ADMISSION NO. 1:**

9                   Admit that gays and lesbians are not politically powerless in the sense that they have no  
10 ability to attract the attention of lawmakers.

11           **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

12                   Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
13 object to this Request on the grounds that it is vague, ambiguous and compound. Subject to the  
14 foregoing objections, Plaintiffs deny this Request for Admission.

15           **REQUEST FOR ADMISSION NO. 2:**

16                   Admit that gays and lesbians exercise political power far in excess of their numbers in the  
17 population.

18           **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

19                   Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
20 this Request on the grounds that it is vague, ambiguous and calls for expert testimony, which is not  
21 yet subject to discovery. Subject to the foregoing objections, Plaintiffs deny this Request for  
22 Admission.

23           **REQUEST FOR ADMISSION NO. 3:**

24                   Admit that in California in recent years, the gay and lesbian community has been successful  
25 in obtaining the enactment of virtually every legislative policy it has desired, including obtaining  
26 domestic partnerships offering essentially the same benefits as marriage.

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

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague, ambiguous and compound. Subject to the foregoing  
4 objections, Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 4:**

6 Admit that the only significant policy supported by many gays and lesbians that has not been  
7 adopted by California is the extension of the official status of marriage to include same sex couples.

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

9 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
10 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
11 Plaintiffs deny this Request for Admission.

12 **REQUEST FOR ADMISSION NO. 5:**

13 Admit that President Barack Obama proclaimed June 2009 to be “Lesbian, Gay, Bisexual, and  
14 Transgender Pride Month.” ([http://www.whitehouse.gov/the\\_press\\_office/Presidential-Proclamation-  
15 LGBT-Pride-Month/](http://www.whitehouse.gov/the_press_office/Presidential-Proclamation-LGBT-Pride-Month/))

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

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
18 foregoing objections, Plaintiffs admit that the web page cited in Defendant-Intervenors’ Request for  
19 Admission No. 5 contains information published by the White House press office and text stating that  
20 President Barack Obama proclaimed June 2009 to be “Lesbian, Gay, Bisexual, and Transgender  
21 Pride Month.”

22 **REQUEST FOR ADMISSION NO. 6:**

23 Admit that President Obama awarded the 2009 Presidential Medal of Freedom to former San  
24 Francisco Supervisor Harvey Milk and Billie Jean King, “one of the first openly lesbian major sports  
25 figure in America.” ([http://www.whitehouse.gov/the\\_press\\_office/President-Obama-Names-Medal-  
26 of-Freedom-Recipients/](http://www.whitehouse.gov/the_press_office/President-Obama-Names-Medal-of-Freedom-Recipients/))

**RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

1  
2 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
3 foregoing objections, Plaintiffs admit that the web page cited in Defendant-Intervenors' Request for  
4 Admission No. 6 contains information published by the White House press office and text stating that  
5 President Obama awarded the 2009 Presidential Medal of Freedom to sixteen honorees, including  
6 former San Francisco Supervisor Harvey Milk and Billie Jean King. Plaintiffs further admit that the  
7 web page cited in Request for Admission No. 6 states that Billie Jean "King became one of the first  
8 openly lesbian major sports figures in America when she came out in 1981."

**REQUEST FOR ADMISSION NO. 7:**

9  
10 Admit that the 2008 national platform of the Democratic Party contained the following  
11 statements on gay rights: "We support the repeal of 'Don't Ask Don't Tell' and the implementation  
12 of policies to allow qualified men and women to serve openly regardless of sexual orientation. . . .  
13 We support the full inclusion of all families, including same-sex couples, in the life of our nation, and  
14 support equal responsibility, benefits, and protections. We will enact a comprehensive bipartisan  
15 employment non-discrimination act. We oppose the Defense of Marriage Act and all attempts to use  
16 this issue to divide us. . . . Democrats will fight to end discrimination based on race, sex, ethnicity,  
17 national origin, language, religion, sexual orientation, gender identity, age, and disability in every  
18 corner of our country, because that's the America we believe in."

19 (<http://www.presidency.ucsb.edu/ws/index.php?pid=78283>)

**RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

20  
21 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
22 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
23 accuracy of the information contained on the web page cited in Request No. 7. Subject to the  
24 foregoing objections, Plaintiffs admit that the web page cited in Request No. 7 contains many pages  
25 of text entitled "2008 Democratic Party Platform." Plaintiffs further admit that the web page contains  
26 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
27 variety of groups. Except as otherwise admitted, Plaintiffs lack knowledge sufficient to admit or  
28 deny Request No. 7.

**REQUEST FOR ADMISSION NO. 8:**

Admit that the 2004 national platform of the Democratic Party contained the following statements on gay rights: “We support full inclusion of gay and lesbian families in the life of our nation and seek equal responsibilities, benefits, and protections for these families. In our country, marriage has been defined at the state level for 200 years, and we believe it should continue to be defined there. We repudiate President Bush’s divisive effort to politicize the Constitution by pursuing a ‘Federal Marriage Amendment.’ Our goal is to bring Americans together, not drive them apart. . . . We will enact the bipartisan legislation barring workplace discrimination based on sexual orientation. We are committed to equal treatment of all service members and believe all patriotic Americans should be allowed to serve our country without discrimination, persecution, or violence.” (<http://www.presidency.ucsb.edu/ws/index.php?pid=29613>)

**RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further respond that they lack knowledge or information sufficient to admit or deny the authenticity or accuracy of the information contained on the web page cited in Request No. 8. Subject to the foregoing objections, Plaintiffs admit that the web page cited in Request No. 8 contains many pages of text titled “2004 Democratic Party Platform.” Plaintiffs further admit that the web page contains text discussing a wide variety of issues, including ongoing and systemic discrimination against a variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny Request No. 8.

**REQUEST FOR ADMISSION NO. 9:**

Admit that the 2000 national platform of the Democratic Party contained the following statements on gay rights: “We will enact the bipartisan legislation barring workplace discrimination based on sexual orientation. We are committed to equal treatment of all service members and believe all patriotic Americans should be allowed to serve our country without discrimination, persecution, or violence. . . . We continue to lead the fight to end discrimination on the basis of race, gender, religion, age, ethnicity, disability, and sexual orientation. . . . We support continued efforts, like the Employment Non-Discrimination Act, to end workplace discrimination against gay men and lesbians.

1 We support the full inclusion of gay and lesbian families in the life of the nation. This would include  
2 an equitable alignment of benefits.” (<http://www.presidency.ucsb.edu/ws/index.php?pid=29612>)

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

4 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
5 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
6 accuracy of the information contained on the web page cited in Request No. 9. Subject to the  
7 foregoing objections, Plaintiffs admit that the web page cited in Request No. 9 contains many pages  
8 of text titled “2000 Democratic Party Platform.” Plaintiffs further admit that the web page contains  
9 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
10 variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
11 Request No. 9.

12 **REQUEST FOR ADMISSION NO. 10:**

13 Admit that the 1996 national platform of the Democratic Party contained the following  
14 statements on gay rights: “We continue to lead the fight to end discrimination on the basis of race,  
15 gender, religion, age, ethnicity, disability, and sexual orientation. . . . We support continued efforts,  
16 like the Employment Non-Discrimination Act, to end discrimination against gay men and lesbians  
17 and further their full inclusion in the life of the nation.”

18 (<http://www.presidency.ucsb.edu/ws/index.php?pid=29611>)

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

20 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
21 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
22 accuracy of the information contained on the web page cited in Request No. 10. Subject to the  
23 foregoing objections, Plaintiffs admit that the web page cited in Request No. 10 contains many pages  
24 of text titled “1996 Democratic Party Platform.” Plaintiffs further admit that the web page contains  
25 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
26 variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
27 Request No. 10.

28



**REQUEST FOR ADMISSION NO. 11:**

Admit that the 1992 national platform of the Democratic Party contained the following statements on gay rights: “Democrats will continue to lead the fight to ensure that no Americans suffer discrimination or deprivation of rights on the basis of race, gender, language, national origin, religion, age, disability, sexual orientation, or other characteristics irrelevant to ability. . . . We will . . . provide civil rights protection for gay men and lesbians and an end to Defense Department discrimination” (<http://www.presidency.ucsb.edu/ws/index.php?pid=29610>)

**RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further respond that they lack knowledge or information sufficient to admit or deny the authenticity or accuracy of the information contained on the web page cited in Request No. 11. Subject to the foregoing objections, Plaintiffs admit that the web page cited in Request No. 11 contains many pages of text titled “1992 Democratic Party Platform.” Plaintiffs further admit that the web page contains text discussing a wide variety of issues, including ongoing and systemic discrimination against a variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny Request No. 11.

**REQUEST FOR ADMISSION NO. 12:**

Admit that the 1988 national platform of the Democratic Party contained the following statement on gay rights: “WE BELIEVE that we honor our multicultural heritage by assuring equal access to government services, employment, housing, business enterprise and education to every citizen regardless of race, sex, national origin, religion, age, handicapping condition or sexual orientation” (<http://www.presidency.ucsb.edu/ws/index.php?pid=29609>)

**RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further respond that they lack knowledge or information sufficient to admit or deny the authenticity or accuracy of the information contained on the web page cited in Request No. 12. Subject to the foregoing objections, Plaintiffs admit that the web page cited in Request No. 12 contains many pages of text titled “1988 Democratic Party Platform.” Plaintiffs further admit that the web page contains

1 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
2 variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
3 Request No. 12.

4 **REQUEST FOR ADMISSION NO. 13:**

5 Admit that the 1984 national platform of the Democratic Party contained the following  
6 statement on gay rights: “Government has a special responsibility to those whom society has  
7 historically prevented from enjoying the benefits of full citizenship for reasons of race, religion, sex,  
8 age, national origin and ethnic heritage, sexual orientation, or disability.”

9 (<http://www.presidency.ucsb.edu/ws/index.php?pid=29608>)

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

11 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
12 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
13 accuracy of the information contained on the web page cited in Request No. 13. Subject to the  
14 foregoing objections, Plaintiffs admit that the web page cited in Request No. 13 contains many pages  
15 of text titled “1984 Democratic Party Platform.” Plaintiffs further admit that the web page contains  
16 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
17 variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
18 Request No. 13.

19 **REQUEST FOR ADMISSION NO. 14:**

20 Admit that the 1980 national platform of the Democratic Party contained the following  
21 statement on gay rights: “All groups must be protected from discrimination based on race, color,  
22 religion, national origin, language, age, sex or sexual orientation.”

23 (<http://www.presidency.ucsb.edu/ws/index.php?pid=29607>)

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

25 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
26 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
27 accuracy of the information contained on the web page cited in Request No. 14. Subject to the  
28 foregoing objections, Plaintiffs admit that the web page cited in Request No. 14 contains many pages

1 of text titled “1980 Democratic Party Platform.” Plaintiffs further admit that the web page contains  
2 text discussing a wide variety of issues, including ongoing and systemic discrimination against a  
3 variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
4 Request No. 14.

5 **REQUEST FOR ADMISSION NO. 15:**

6 Admit that Democratic Party rules for selecting delegates to the national party convention  
7 mandate that state parties “develop and submit Party outreach programs, including recruitment,  
8 education and training, in order to achieve full participation” of “groups historically under-  
9 represented in the Democratic Party’s affairs, by virtue of race, ethnicity, age, sexual orientation or  
10 disability” (Rule 5(c)), and obligate state parties to “adopt and implement Inclusion Programs in  
11 order to achieve the full participation” of LGBT individuals in “the delegate selection process and in  
12 all party affairs, as indicated by their presence in the Democratic electorate.” (Rule 7).

13 ([http://s3.amazonaws.com/apache.3cdn.net/de68e7b6dfa0743217\\_hwm6bhyc4.pdf](http://s3.amazonaws.com/apache.3cdn.net/de68e7b6dfa0743217_hwm6bhyc4.pdf))

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

15 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
16 object to this Request on the grounds that it is vague and ambiguous, in particular the use of the terms  
17 “obligate” and “mandate.” Plaintiffs also object to this Request to the extent that it may not be  
18 relevant to any party’s claim or defense in this action or reasonably calculated to lead to the discovery  
19 of admissible evidence. Plaintiffs further respond that they lack knowledge or information sufficient  
20 to admit or deny the authenticity or accuracy of the information contained on the web page cited in  
21 Request No. 15. Subject to the foregoing objections, Plaintiffs admit that the web page cited in  
22 Request No. 15 contains a twenty-seven page document, including the text selectively quoted in  
23 Request No. 15. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
24 Request No. 15.

25 **REQUEST FOR ADMISSION NO. 16:**

26 Admit that the Employee Nondiscrimination Act of 2007, which would have prohibited  
27 employment discrimination on the basis of sexual orientation, passed the House by a 235 to 184 vote,  
28

1 with 200 Democrats and 35 Republicans voting in favor. (House Roll Call Vote No. 1057, 110th  
2 Cong., Nov. 7, 2007).

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

4 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
5 object to this Request to the extent that it may not be relevant to any party's claim or defense in this  
6 action or reasonably calculated to lead to the discovery of admissible evidence. Subject to the  
7 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny Request  
8 No. 16.

9 **REQUEST FOR ADMISSION NO. 17:**

10 Admit that more than half the U.S. population lived in jurisdictions covered by laws banning  
11 discrimination on the basis of sexual orientation. ([http://www.thetaskforce.org/reports and  
12 research/fact\\_sheets/family\\_nondiscrimination\\_05\\_07](http://www.thetaskforce.org/reports_and_research/fact_sheets/family_nondiscrimination_05_07))

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

14 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
15 object to this Request to the extent that it may not be relevant to any party's claim or defense in this  
16 action or reasonably calculated to lead to the discovery of admissible evidence. Subject to the  
17 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny Request  
18 No. 17.

19 **REQUEST FOR ADMISSION NO. 18:**

20 Admit that 31 senators and 128 congressmen were awarded a 90% or better rating for the  
21 110th Congress (2007 to 2008) by the Human Rights Campaign. HRC Congressional Scorecard,  
22 [http://www.hrc.org/documents/Congress\\_Scorecard-110th.pdf](http://www.hrc.org/documents/Congress_Scorecard-110th.pdf)

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

24 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
25 object to this Request to the extent that it may not be relevant to any party's claim or defense in this  
26 action or reasonably calculated to lead to the discovery of admissible evidence. Subject to the  
27 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny Request  
28 No. 18.

1 **REQUEST FOR ADMISSION NO. 19:**

2 Admit that in its 2008 platform, the California Democratic Party stated that it “support[s]  
3 nondiscrimination and equality for Lesbian, Gay, Bisexual, and Transgender people in all aspects of  
4 their lives” and “support[s] the LGBT Community in its quest for the right to legal marriage.”

5 ([http://www.cadem.org/atf/cf/{BF9D7366-E5A7-41C3-8E3F-  
6 E06FB835FCCE}/2008%20Platform%20Combined%20Final.pdf](http://www.cadem.org/atf/cf/{BF9D7366-E5A7-41C3-8E3F-E06FB835FCCE}/2008%20Platform%20Combined%20Final.pdf))

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

8 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
9 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
10 accuracy of the information contained on the web page cited in Request No. 19. Subject to the  
11 foregoing objections, Plaintiffs admit that the web page cited in Request No. 19 contains fourteen  
12 pages of text discussing a wide variety of issues, including ongoing and systemic discrimination  
13 against a variety of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to  
14 admit or deny Request No. 19.

15 **REQUEST FOR ADMISSION NO. 20:**

16 Admit that in its 2008 platform, the Green Party of California stated that “We support the  
17 freedom to marry, and all the rights, benefits, and responsibilities thereof, without discrimination  
18 based on sex, gender, or sexual orientation” and that “We support state and federal legislation  
19 (including constitutional amendments) to ban discrimination based on sex, gender, and sexual  
20 orientation. We oppose measures that restrict rights or create unequal treatment based on sex,  
21 gender, or sexual orientation.” ([http://www.cagreens.org/platform/platform\\_justice.shtml#sogige](http://www.cagreens.org/platform/platform_justice.shtml#sogige)).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

23 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
24 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
25 accuracy of the information contained on the web page cited in Request No. 20. Subject to the  
26 foregoing objections, Plaintiffs admit that the web page cited in Request No. 20 contains text  
27 discussing a wide variety of issues, including ongoing and systemic discrimination against a variety  
28

1 of groups. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or deny  
2 Request No. 20.

3 **REQUEST FOR ADMISSION NO. 21:**

4 Admit that California Governor Arnold Schwarzenegger, Lt. Governor John Garamendi,  
5 Senator Barbara Boxer, Senator Dianne Feinstein, Attorney General Edmund G. Brown, Secretary of  
6 State Debra Bowen, State Treasure Bill Lockyer, State Controller John Chiang, State Superintendent  
7 of Public Instruction Jack O'Connell all sent official greeting messages to California's 2009 Lesbian,  
8 Gay, Bisexual and Transgender Pride Celebrations. ([http://www.capride.org/proc\\_all.htm](http://www.capride.org/proc_all.htm)).

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

10 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
11 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
12 accuracy of the information contained on the web page cited in Request No. 21. Subject to the  
13 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny Request  
14 No. 21.

15 **REQUEST FOR ADMISSION NO. 22:**

16 Admit that four openly gay or lesbian individuals serve in the California legislature: State  
17 Sen. Mark Leno (D, San Francisco), State Sen. Christine Kehoe (D, San Diego), State Assemblyman  
18 Tom Ammiano (D, San Francisco), and State Assemblyman John Perez (D, Los Angeles).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

20 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs also  
21 object to this Request on the grounds that it is compound. Subject to the foregoing objections,  
22 Plaintiffs admit that to the best of their knowledge, four openly gay or lesbian individuals serve in the  
23 California legislature.

24 **REQUEST FOR ADMISSION NO. 23:**

25 Admit that California's political branches passed the state's first domestic partnership statute  
26 in 1999, and expanded domestic partnerships' rights and benefits in 2001, 2002, 2003, 2004, 2005,  
27 2006, and 2007. See 2007 Cal. Stat. ch. 567; 2006 Cal. Stat. ch. 802; 2005 Cal. Stat. ch. 416; 2004  
28

1 Cal. Stat. ch. 488; 2003 Cal. Stat. ch. 421; 2002 Cal. Stat. ch. 447; 2001 Cal. Stat. ch. 893; 1999 Cal.  
2 Stat. ch. 588.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

4 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
5 this Request on the grounds that it is vague and ambiguous, in particular in its reference to “domestic  
6 partnership” and “expanded.” Subject to the foregoing objections, Plaintiffs admit that California  
7 passed the cited laws. Except as expressly admitted, Plaintiffs lack knowledge sufficient to admit or  
8 deny Request No. 23.

9 **REQUEST FOR ADMISSION NO. 24:**

10 Admit that in 1978, California voters rejected Proposition 6, also known as the “Briggs  
11 Initiative,” which would have allowed school systems to fire any teacher found to be “advocating,  
12 imposing, encouraging or promoting” homosexual activity by a 58% to 41% margin.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

14 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs also  
15 object to this Request on the grounds that it is vague, ambiguous and compound. Subject to the  
16 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 24.

17 **REQUEST FOR ADMISSION NO. 25:**

18 Admit that in the 2008 election cycle, the “No on 8: Equality for All “ campaign committee  
19 raised and spent more than \$43.0 million to defeat Proposition 8.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

21 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
22 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 25.

23 **REQUEST FOR ADMISSION NO. 26:**

24 Admit that in the 2008 election cycle, the “Win Marriage Back” campaign committee raised  
25 and spent more than \$12.5 million to defeat Proposition 8.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

27 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
28 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 26.

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that in the 2008 election cycle, the “Human Rights Campaign California Marriage  
3 PAC “ campaign committee raised and spent more than \$3.6 million to defeat Proposition 8.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
6 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 27.

7 **REQUEST FOR ADMISSION NO. 28:**

8 Admit that in the 2008 election cycle, the “No on Proposition 8, Campaign for Marriage  
9 Equality” campaign committee raised and spent more than \$2.0 million to defeat Proposition 8.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

11 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
12 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 28.

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that in the 2008 election cycle, the “Californians Against Eliminating Basic Rights”  
15 campaign committee raised and spent more than \$1.1 million to defeat Proposition 8.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
18 foregoing objections, Plaintiffs lack knowledge sufficient to admit or deny Request No. 29.

19 **REQUEST FOR ADMISSION NO. 30:**

20 Admit that California universities host 22 gay and lesbian student centers, the most of any  
21 state in the nation. 2008 Annual Report, Consortium of Higher Education LGBT Resource  
22 Professionals, available at <http://www.lgbtcampus.org/about/files/2009AnnualReport.pdf>

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

24 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
25 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
26 accuracy of the information contained on the web page cited in Request No. 30. Subject to the  
27 foregoing objections, Plaintiffs admit that the web page cited in Defendant-Intervenors’ Request for  
28 Admission No. 30 contains a sixteen page document purporting to be the “Consortium of Higher



1 Education LGBT Resource Professionals Annual Report 2008.” Except as expressly admitted,  
2 Plaintiffs lack knowledge or information sufficient to admit or deny the remainder of Request No. 30.

3 **REQUEST FOR ADMISSION NO. 31:**

4 Admit that on average, same-sex couples in California are more affluent than heterosexual  
5 married couples; and that the median income of same-sex couples in California is \$103,030 for male  
6 couples and \$86,000 for female couples, significantly higher than the median household income of  
7 opposite-sex married couples in California, \$76,500. *Census Snapshot: California Lesbian, Gay,  
8 And Bisexual Population*, The Williams Institute at UCLA Law School,  
9 (<http://www.law.ucla.edu/williamsinstitute/publications/CA%20Snapshot%202008.pdf>)

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

11 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
12 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
13 use of the terms “average,” “more affluent,” “same-sex couples” and “significantly higher.”  
14 Plaintiffs also object to this Request on the grounds and to the extent that it may not be relevant to  
15 any party’s claim or defense in this action or reasonably calculated to lead to the discovery of  
16 admissible evidence. Plaintiffs further respond that they lack knowledge or information sufficient to  
17 admit or deny the authenticity or accuracy of the information contained on the web page cited in  
18 Request No. 31. Subject to the foregoing objections, Plaintiffs admit that the web page cited in  
19 Defendant-Intervenors’ Request for Admission No. 31 contains a seven page document entitled  
20 “Census Snapshot” and purportedly published by the “Williams Institute.” Except as expressly  
21 admitted, Plaintiffs lack knowledge or information sufficient to admit or deny Request No. 31.

22 **REQUEST FOR ADMISSION NO. 32:**

23 Admit that the Los Angeles Gay and Lesbian Center received \$11.1 million in government  
24 grants in 2008 ([http://www.lagaycenter.org/site/DocServer/AR08\\_r1.pdf?docID=6921](http://www.lagaycenter.org/site/DocServer/AR08_r1.pdf?docID=6921)) and \$10.5  
25 million in government grants in 2006. (2006 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

27 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
28 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its

1 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
2 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
3 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
4 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 32 does not  
5 provide a 2006 IRS Form 990. Additionally, Plaintiffs respond that they lack knowledge or  
6 information sufficient to admit or deny the authenticity or accuracy of any information contained on  
7 the web pages cited in Request No. 32. Subject to the foregoing objections, Plaintiffs admit that the  
8 web page cited first in Defendant-Intervenors’ Request for Admission No. 32.

9 ([http://www.lagaycenter.org/site/DocServer/AR08\\_r1.pdf?docID=6921](http://www.lagaycenter.org/site/DocServer/AR08_r1.pdf?docID=6921)) contains a fourteen page  
10 document entitled “L.A. Gay & Lesbian Center Annual Report 2008.” Except as expressly admitted,  
11 Plaintiffs lack knowledge or information sufficient to admit or deny Request No. 32.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the San Diego LGBT Community Center received \$1.8 million in government  
14 grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

16 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
17 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
18 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
19 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
20 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that because the  
21 web page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 33 does not  
22 provide a 2007 IRS Form 990. Except as expressly admitted, Plaintiffs lack knowledge or  
23 information sufficient to admit or deny Request No. 33.

24 **REQUEST FOR ADMISSION NO. 34:**

25 Admit that the San Francisco LGBT Community Center received \$986,722 in government  
26 grants in 2008. ([http://www.scribd.com/doc/13974216/San-Francisco-LGBT-Community-Center-  
27 Annual-Report-200708](http://www.scribd.com/doc/13974216/San-Francisco-LGBT-Community-Center-Annual-Report-200708))

28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
3 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
4 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
5 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
6 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that they lack  
7 knowledge or information sufficient to admit or deny the authenticity or accuracy of the information  
8 contained on the web page cited in Request No. 34. Subject to the foregoing objections, Plaintiffs  
9 admit that the web page cited in Defendant-Intervenors’ Request for Admission No. 34 contains a 28  
10 page document entitled “San Francisco LGBT Community Center 2007/2008 Annual Report.”  
11 Except as expressly admitted, Plaintiffs lack knowledge or information sufficient to admit or deny  
12 Request No. 34.

13 **REQUEST FOR ADMISSION NO. 35:**

14 Admit that the Gay and Lesbian Community Services Center of Orange County received  
15 \$344,404 in government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
18 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
19 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
20 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
21 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
22 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 35 does not  
23 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
24 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
25 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
26 information sufficient to admit or deny Request No. 35.

1 **REQUEST FOR ADMISSION NO. 36:**

2 Admit that the One National Gay and Lesbian Archives in Los Angeles received \$90,728 in  
3 government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
6 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
7 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
8 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
9 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
10 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 36 does not  
11 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
12 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
13 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
14 information sufficient to admit or deny Request No. 36.

15 **REQUEST FOR ADMISSION NO. 37:**

16 Admit that the San Francisco LGBT Parade Committee received \$77,200 in government  
17 grants in 2006 (2006 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
20 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
21 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
22 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
23 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
24 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 37 does not  
25 provide a 2006 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
26 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
27 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
28 information sufficient to admit or deny Request No. 37.

1 **REQUEST FOR ADMISSION NO. 38:**

2 Admit that the GLBT Historical Society of California in San Francisco received \$234,781 in  
3 government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
6 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
7 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
8 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
9 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
10 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 38 does not  
11 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
12 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
13 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
14 information sufficient to admit or deny Request No. 38.

15 **REQUEST FOR ADMISSION NO. 39:**

16 Admit that the Queer Cultural Center in San Francisco received \$263,646 in government  
17 grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 39:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
20 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
21 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
22 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
23 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
24 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 39 does not  
25 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
26 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
27 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
28 information sufficient to admit or deny Request No. 39.

1 **REQUEST FOR ADMISSION NO. 40:**

2 Admit that Gay and Lesbian Adolescent Social Services of Burbank received \$10.4 million in  
3 government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
6 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
7 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
8 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
9 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
10 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 40 does not  
11 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
12 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
13 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
14 information sufficient to admit or deny Request No. 40.

15 **REQUEST FOR ADMISSION NO. 41:**

16 Admit that the Lavender Youth Recreation and Information Center in San Francisco received  
17 \$725,902 in government grants in 2006 (2006 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
20 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
21 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
22 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
23 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
24 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 41 does not  
25 provide a 2006 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
26 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
27 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
28 information sufficient to admit or deny Request No. 41.

1 **REQUEST FOR ADMISSION NO. 42:**

2 Admit that the group Community United Against Violence of San Francisco received  
3 \$966,958 in government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
6 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
7 use of the phrase “government grants.” Plaintiffs also object to this Request on the grounds and to  
8 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
9 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
10 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 42 does not  
11 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
12 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
13 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
14 information sufficient to admit or deny Request No. 42.

15 **REQUEST FOR ADMISSION NO. 43:**

16 Admit that the Pacific Pride Foundation in Santa Barbara received \$1.2 million in government  
17 grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
20 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
21 use of the phrase “government grants”. Plaintiffs also object to this Request on the grounds and to  
22 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
23 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
24 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 43 does not  
25 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
26 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
27 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
28 information sufficient to admit or deny Request No. 43.

1 **REQUEST FOR ADMISSION NO. 44:**

2 Admit that the Our Family Coalition organization of San Francisco received \$471,757 in  
3 government grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
6 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
7 use of the phrase “government grants”. Plaintiffs also object to this Request on the grounds and to  
8 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
9 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
10 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 44 does not  
11 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
12 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
13 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
14 information sufficient to admit or deny Request No. No. 44.

15 **REQUEST FOR ADMISSION NO. 45:**

16 Admit that the Stepping Stone of San Diego organization received \$1.5 million in government  
17 grants in 2007 (2007 IRS Form 990, available at [www.guidestar.org](http://www.guidestar.org)).

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
20 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
21 use of the phrase “government grants”. Plaintiffs also object to this Request on the grounds and to  
22 the extent that it may not be relevant to any party’s claim or defense in this action or reasonably  
23 calculated to lead to the discovery of admissible evidence. Plaintiffs further respond that the web  
24 page [www.guidestar.org](http://www.guidestar.org) cited in Defendant-Intervenors’ Request for Admission No. 45 does not  
25 provide a 2007 IRS Form 990. Plaintiffs further respond that they lack knowledge or information  
26 sufficient to admit or deny the authenticity or accuracy of any information contained in the web page  
27 cited in the Request. Except as expressly admitted, Plaintiffs respond that they lack knowledge or  
28 information sufficient to admit or deny Request No. 45.



1 **REQUEST FOR ADMISSION NO. 46:**

2 Admit that, at present, discrimination against individuals practicing a homosexual lifestyle is  
3 increasingly rare.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous, in particular with respect to the phrase  
7 “increasingly rare.” Plaintiffs further object to this Request on the grounds that the phrase  
8 “homosexual lifestyle” is unintelligible. Subject to the foregoing objections, Plaintiffs deny this  
9 Request for Admission.

10 **REQUEST FOR ADMISSION NO. 47:**

11 Admit that, apart from access to civil marriage, public discrimination against gays and  
12 lesbians by state and local governments in California is virtually non-existent.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

14 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
15 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
16 Plaintiffs admit that the denial of access to civil marriage is a form of public (as well as private)  
17 discrimination. Except as expressly admitted, Plaintiffs deny this Request for Admission.

18 **REQUEST FOR ADMISSION NO. 48:**

19 Admit that homosexual lifestyles are widely accepted in California.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

21 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
22 this Request on the grounds that it is vague and ambiguous. Plaintiffs further object to this Request  
23 on the grounds that the term “homosexual lifestyles” is unintelligible. Subject to the foregoing  
24 objections, Plaintiffs deny this Request for Admission.

25 **REQUEST FOR ADMISSION NO. 49:**

26 Admit that private discrimination against gay and lesbians in California is increasingly rare.  
27  
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
4 Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 50:**

6 Admit that many openly gay and lesbian individuals have served in California politics and  
7 government, including: former San Francisco Board of Supervisors Member Roberta Achtenberg;  
8 California Assemblyman Tom Ammiano; West Sacramento Mayor Christopher Cabaldon; former  
9 U. S. Ambassador to Luxembourg James Hormel; California State Senator Christine Kehoe; Susan  
10 Kennedy, chief of staff to Gov. Arnold Schwarzenegger; State Senator Mark Leno; former State  
11 Senator Carole Migden; former San Francisco Board of Supervisors Member Harvey Milk; Daniel  
12 Zingale, chief of staff for Maria Shriver.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

14 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
15 this Request on the grounds that it is vague and ambiguous. Plaintiffs further object to this Request  
16 on the grounds that it is compound. Subject to the foregoing objections, Plaintiffs admit that to the  
17 best of their knowledge, openly gay and lesbian individuals have served in California politics and  
18 government, including: former San Francisco Board of Supervisors Member Roberta Achtenberg;  
19 California Assemblyman Tom Ammiano; West Sacramento Mayor Christopher Cabaldon; former  
20 U. S. Ambassador to Luxembourg James Hormel; California State Senator Christine Kehoe; Susan  
21 Kennedy, chief of staff to Gov. Arnold Schwarzenegger; State Senator Mark Leno; former State  
22 Senator Carole Migden; former San Francisco Board of Supervisors Member Harvey Milk; Daniel  
23 Zingale, former chief of staff for Maria Shriver. Except as expressly admitted, Plaintiffs deny  
24 Request No. 50.

25 **REQUEST FOR ADMISSION NO. 51:**

26 Admit that many openly gay and lesbian individuals have been active in California's arts and  
27 cultural community.

28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
4 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
5 many respects, including by contributing to California's arts and cultural community, athletics  
6 community, faith and spiritual communities, medical community, media organizations, entertainment  
7 industry, business community, labor force, academic community, nonprofit organizations,  
8 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
9 Request No. 51.

10 **REQUEST FOR ADMISSION NO. 52:**

11 Admit that many openly gay and lesbian individuals have been active in California athletics.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

13 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
15 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
16 many respects, including by contributing to California's arts and cultural community, athletics  
17 community, faith and spiritual communities, medical community, media organizations, entertainment  
18 industry, business community, labor force, academic community, nonprofit organizations,  
19 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
20 Request No. 52.

21 **REQUEST FOR ADMISSION NO. 53:**

22 Admit that many openly gay and lesbian individuals have worked at California media  
23 organizations.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

25 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
26 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
27 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
28 many respects, including by contributing to California's arts and cultural community, athletics

1 community, faith and spiritual communities, medical community, media organizations, entertainment  
2 industry, business community, labor force, academic community, nonprofit organizations,  
3 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
4 Request No. 53.

5 **REQUEST FOR ADMISSION NO. 54:**

6 Admit that many openly gay and lesbian individuals have worked in California's  
7 entertainment industry.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

9 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
10 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
11 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
12 many respects, including by contributing to California's arts and cultural community, athletics  
13 community, faith and spiritual communities, medical community, media organizations, entertainment  
14 industry, business community, labor force, academic community, nonprofit organizations,  
15 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
16 Request No. 54.

17 **REQUEST FOR ADMISSION NO. 55:**

18 Admit that many openly gay and lesbian individuals have been leaders in California's  
19 business community.

20 **RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

21 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
22 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
23 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
24 many respects, including by contributing to California's arts and cultural community, athletics  
25 community, faith and spiritual communities, medical community, media organizations, entertainment  
26 industry, business community, labor force, academic community, nonprofit organizations,  
27 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
28 Request No. 55.

1 **REQUEST FOR ADMISSION NO. 56:**

2 Admit that many openly gay and lesbian individuals have been leaders at California  
3 universities.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
7 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
8 many respects, including by contributing to California's arts and cultural community, athletics  
9 community, faith and spiritual communities, medical community, media organizations, entertainment  
10 industry, business community, labor force, academic community, nonprofit organizations,  
11 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
12 Request No. 56.

13 **REQUEST FOR ADMISSION NO. 57:**

14 Admit that many openly gay and lesbian individuals have been leaders in California's legal  
15 profession.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
18 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
19 Plaintiffs admit that openly gay and lesbian individuals have contributed to the state of California in  
20 many respects, including by contributing to California's arts and cultural community, athletics  
21 community, faith and spiritual communities, medical community, media organizations, entertainment  
22 industry, business community, labor force, academic community, nonprofit organizations,  
23 government institutions and its legal profession. Except as expressly admitted, Plaintiffs deny  
24 Request No. 57.

25 **REQUEST FOR ADMISSION NO. 58:**

26 Admit that, with the exception of the denomination "marriage," under California law "same-  
27 sex couples retain the same substantive protections embodied in the state constitutional rights of  
28 privacy and due process as those accorded to opposite-sex couples and the same broad protections

1 under the state equal protection clause that are set forth in the majority opinion in the *Marriage*  
 2 *Cases.*” *Strauss v. Horton*, 46 Cal. 4th 364, 412 (Cal. 2009).

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

4 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs also  
 5 object to this Request to the extent it calls for a legal conclusion. Plaintiffs further object to this  
 6 Request on the grounds that it is vague, ambiguous, and compound. Subject to the foregoing  
 7 objections, Plaintiffs admit only that *Strauss v. Horton*, 46 Cal. 4th 364, 412 (Cal. 2009) states,  
 8 among other things: “In sum, although Proposition 8 changes the state Constitution, as interpreted in  
 9 the majority opinion in the *Marriage Cases*, *supra*, 43 Cal.4th 757, 76 Cal.Rptr.3d 683, 183 P.3d  
 10 384, to provide that restricting the family designation of ‘marriage’ to opposite-sex couples only, and  
 11 withholding that designation from same-sex couples, no longer violates the state Constitution, in all  
 12 other respects same-sex couples retain the same substantive protections embodied in the state  
 13 constitutional rights of privacy and due process as those accorded to opposite-sex couples and the  
 14 same broad protections under the state equal protection clause that are set forth in the majority  
 15 opinion in the *Marriage Cases*, including the general principle that sexual orientation constitutes a  
 16 suspect classification and that statutes according differential treatment on the basis of sexual  
 17 orientation are constitutionally permissible only if they satisfy the strict scrutiny standard of review.”  
 18 To the extent that this Request states or implies that such rights have been implemented by the State,  
 19 Plaintiffs deny that the State has altered its laws and policies to implement this, and further responds  
 20 that there are still differences in the ways that registered domestic partners and spouses are treated,  
 21 such as access to long term health care benefits for state employees. To the extent that this Request  
 22 states or implies that a separate system of domestic partnerships could ever be equal to marriage,  
 23 Plaintiffs specifically deny that Request.

24 **REQUEST FOR ADMISSION NO. 59:**

25 Admit that the California Registered Domestic Partner Rights and Responsibilities Act of  
 26 2003, Stats. 2003, ch. 421, gives to domestic partners “the full range of legal rights, protections and  
 27 benefits, as well as all of the responsibilities, obligations, and duties to each other, to their children, to  
 28

1 third parties and to the state, as the laws of California extend to and impose upon spouses.” Stats.  
2 2003, ch. 421, § 15.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

4 Plaintiffs incorporate their General Objections as if stated fully herein. Plaintiffs also object  
5 to this Request on the grounds and to the extent that it may not be relevant to any party’s claim or  
6 defense in this action or reasonably calculated to lead to the discovery of admissible evidence.  
7 Plaintiffs further object to the extent the Request calls for a legal conclusion. Subject to the  
8 foregoing objections, Plaintiffs admit that Stats. 203, ch. 421, § 15 added section 297.5 to the  
9 California Family Code. Except as expressly admitted, Plaintiffs deny Request No. 59.

10 **REQUEST FOR ADMISSION NO. 60:**

11 Admit that California law puts domestic partners on an equal footing with married spouses  
12 with respect to inheritance and intestacy, id. sec. 297.5(c).

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 60:**

14 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
15 this Request on the grounds that it is vague and ambiguous, in particular in its use of the phrase  
16 “equal footing,” Plaintiffs further object to the extent the Request calls for a legal conclusion.  
17 Subject to the foregoing objections, Plaintiffs admit that Cal. Family Code § 297.5(c) is part of the  
18 law of California. Except as expressly admitted, Plaintiffs deny Request No. 60.

19 **REQUEST FOR ADMISSION NO. 61:**

20 Admit that California law puts domestic partners on an equal footing with married spouses  
21 with respect to property, id. sec. 297.5(k)(1).

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

23 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
24 this Request on the grounds that it is vague and ambiguous, in particular in its use of the phrase  
25 “equal footing.” Plaintiffs further object to the extent the Request calls for a legal conclusion.  
26 Subject to the foregoing objections, Plaintiffs admit that Cal. Family Code § 297.5(k)(1) is part of the  
27 law of California. Except as expressly admitted, Plaintiffs deny Request No. 61.

28

1 **REQUEST FOR ADMISSION NO. 62:**

2 Admit that California law puts domestic partners on an equal footing with married spouses  
3 with respect to insurance coverage, Cal. Ins. Code sec. 381.5.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous, in particular in its use of the phrase  
7 “equal footing.” Plaintiffs further object to the extent the Request calls for a legal conclusion.  
8 Subject to the foregoing objections, Plaintiffs admit that Cal. Insurance Code § 381.5 is part of the  
9 law of California. Except as expressly admitted, Plaintiffs deny Request No. 62.

10 **REQUEST FOR ADMISSION NO. 63:**

11 Admit that California law puts domestic partners on an equal footing with married spouses  
12 with respect to state tax treatment, Cal. Rev. & Tax Code secs. 17024.5(h)(2)(B), 18521(d).

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

14 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
15 this Request on the grounds that it is vague and ambiguous, in particular in its use of the phrase  
16 “equal footing.” Plaintiffs further object to the extent the Request calls for a legal conclusion.  
17 Subject to the foregoing objections, Plaintiffs admit that Cal. Revenue & Tax Code § 17024.5(h) is  
18 part of the law of California. Except as expressly admitted, Plaintiffs deny Request No. 63.

19 **REQUEST FOR ADMISSION NO. 64:**

20 Admit that California is one of “[t]wenty states and the District of Columbia [with] laws that  
21 explicitly prohibit sexual orientation discrimination in private employment.” Preventing Sexual  
22 Orientation Discrimination in the Workplace, Nolo,  
23 [http://www.nolo.com/article.cfm/objectID/E76BEBE6-E194-46C1-](http://www.nolo.com/article.cfm/objectID/E76BEBE6-E194-46C1-983629F17557E86D/111/259/283/ART/)  
24 [983629F17557E86D/111/259/283/ART/](http://www.nolo.com/article.cfm/objectID/E76BEBE6-E194-46C1-983629F17557E86D/111/259/283/ART/) (listing California, Colorado, Connecticut, Hawaii, Illinois,  
25 Iowa, Maine, Maryland, Massachusetts, Minnesota, Nevada, New Hampshire, New Jersey, New  
26 Mexico, New York, Oregon, Rhode Island, Vermont, Washington, and Wisconsin).



1 **RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
3 respond that they lack knowledge or information sufficient to admit or deny the authenticity or  
4 accuracy of the information contained on the web page cited in Request No. 64. Subject to the  
5 foregoing objections, Plaintiffs admit that the web page cited in Defendant-Intervenors' Request for  
6 Admission No. 64 contains a document entitled "Preventing Sexual Orientation Discrimination in the  
7 Workplace." Plaintiffs lack knowledge or information sufficient to admit or deny the remainder of  
8 the Request.

9 **REQUEST FOR ADMISSION NO. 65:**

10 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
11 basis of sexual orientation in businesses' provision of services, Cal. Civil Code § 51.5.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

13 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous, in particular in its reference to "laws" in  
15 the plural form and "businesses' provision of services." Plaintiffs further object to the Request on the  
16 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
17 Subject to the foregoing objections, Plaintiffs admit that Cal. Civil Code § 51.5 is part of the law of  
18 California.

19 **REQUEST FOR ADMISSION NO. 66:**

20 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
21 basis of sexual orientation in the peremptory challenges of jurors, Cal. Code of Civil Procedure  
22 § 231.5.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

24 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
25 this Request on the grounds that it is vague and ambiguous, in particular in its reference to "laws" in  
26 the plural form. Plaintiffs further object to the Request on the grounds and to the extent that it calls  
27 for a legal conclusion and thus does not require an answer. Subject to the foregoing objections,  
28 Plaintiffs admit that Cal. Code of Civil Procedure § 231.5 is part of the law of California.

1 **REQUEST FOR ADMISSION NO. 67:**

2 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
3 basis of sexual orientation in public education, Cal. Ed. Code § 200.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous, in particular in its reference to "laws" in  
7 the plural form and "public education." Plaintiffs further object to the Request on the grounds and to  
8 the extent that it calls for a legal conclusion and thus does not require an answer. Subject to the  
9 foregoing objections, Plaintiffs admit that Cal. Education Code § 200 is part of the law of California.  
10 Except as expressly admitted, Plaintiffs deny this Request for Admission.

11 **REQUEST FOR ADMISSION NO. 68:**

12 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
13 basis of sexual orientation in state-funded educational programs, id. § 220, Cal. Wel. & Inst. Code  
14 § 14504.1(c).

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

16 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
17 this Request on the grounds that it is vague and ambiguous, in particular in its reference to  
18 "educational programs." Plaintiffs further object to the Request on the grounds and to the extent that  
19 it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
20 objections, Plaintiffs admit that Cal. Education Code § 220 and Cal. Wel. & Inst. Code § 14504.1(c)  
21 are part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
22 Admission.

23 **REQUEST FOR ADMISSION NO. 69:**

24 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
25 basis of sexual orientation in secondary education, Cal. Ed. Code § 66251.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

27 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
28 this Request on the grounds that it is vague and ambiguous, in particular in its reference to "laws" in

1 the plural form and its use of the phrase “secondary education.” Plaintiffs further object to the  
2 Request on the grounds and to the extent that it calls for a legal conclusion and thus does not require  
3 an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Education Code § 66251 is  
4 part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
5 Admission.

6 **REQUEST FOR ADMISSION NO. 70:**

7 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
8 basis of sexual orientation in post-secondary education, id. § 66270.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

10 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
11 this Request on the grounds that it is vague and ambiguous, in particular in its reference to “laws” in  
12 the plural form and the phrase “post-secondary education.” Plaintiffs further object to the Request on  
13 the grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
14 Subject to the foregoing objections, Plaintiffs admit that Cal. Education Code § 66270 is part of the  
15 law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

16 **REQUEST FOR ADMISSION NO. 71:**

17 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
18 basis of sexual orientation in any state-funded program or activity, Cal. Gov. Code § 11135(a).

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

20 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
21 this Request on the grounds that it is vague and ambiguous, in particular in its reference to “laws” in  
22 the plural form, as well as the terms “any”, “state-funded”, “program” and “activity.” Plaintiffs  
23 further object to the Request on the grounds and to the extent that it calls for a legal conclusion and  
24 thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit that Cal.  
25 Government Code § 11135(a) is part of the law of California. Except as expressly admitted,  
26 Plaintiffs deny this Request for Admission.

1 **REQUEST FOR ADMISSION NO. 72:**

2 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
3 basis of sexual orientation in employment, id. §§ 12920, 12921, 12940.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds and to the extent that it may not be relevant to any party's claim or  
7 defense in this action or reasonably calculated to lead to the discovery of admissible evidence.  
8 Plaintiffs further object to the Request on the grounds and to the extent that it calls for a legal  
9 conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit  
10 that Cal. Government Code §§ 12920, 12921, and 12940 are part of the law of California. Except as  
11 expressly admitted, Plaintiffs deny this Request for Admission.

12 **REQUEST FOR ADMISSION NO. 73:**

13 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
14 basis of sexual orientation in housing, id. §§ 12921, 12955, 12955.8.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

16 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
17 this Request on the grounds and to the extent that it may not be relevant to any party's claim or  
18 defense in this action or reasonably calculated to lead to the discovery of admissible evidence.  
19 Plaintiffs further object to the Request on the grounds and to the extent that it calls for a legal  
20 conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit  
21 that Cal. Government Code §§ 12921, 12955, and 12955.8 are part of the law of California. Except  
22 as expressly admitted, Plaintiffs deny this Request for Admission.

23 **REQUEST FOR ADMISSION NO. 74:**

24 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
25 basis of sexual orientation in labor organizations, id. § 12940(b).

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

27 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
28 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the

1 plural form “laws” and the term “labor organizations.” Plaintiffs further object to the Request on the  
2 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
3 Subject to the foregoing objections, Plaintiffs admit that Cal. Government Code § 12940(b) is part of  
4 the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 75:**

6 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
7 basis of sexual orientation in apprenticeships, id. § 12940(c).

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 75:**

9 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
10 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
11 plural form “laws” and the term “apprenticeships.” Plaintiffs further object to the Request on the  
12 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
13 Subject to the foregoing objections, Plaintiffs admit that Cal. Government Code § 12940(c) is part of  
14 the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

15 **REQUEST FOR ADMISSION NO. 76:**

16 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
17 basis of sexual orientation in licensing boards, id. § 12944.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
20 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
21 plural form “laws” and the term “licensing boards.” Plaintiffs further object to the Request on the  
22 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
23 Subject to the foregoing objections, Plaintiffs admit that Cal. Government Code § 12944 is part of the  
24 law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

25 **REQUEST FOR ADMISSION NO. 77:**

26 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
27 basis of sexual orientation in civil service, id. § 18500.

28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 77:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
4 plural form “laws” and the term “civil service.” Plaintiffs further object to the Request on the  
5 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
6 Subject to the foregoing objections, Plaintiffs admit that Cal. Government Code § 18500 is part of the  
7 law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

8 **REQUEST FOR ADMISSION NO. 78:**

9 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
10 basis of sexual orientation in health insurance, Cal. Health & Saf. Code § 1365.5.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 78:**

12 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
13 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
14 plural form “laws” and the term “health insurance.” Plaintiffs further object to the Request on the  
15 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
16 Subject to the foregoing objections, Plaintiffs admit that Cal. Health & Safety Code § 1365.5 is part  
17 of the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

18 **REQUEST FOR ADMISSION NO. 79:**

19 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
20 basis of sexual orientation in certification of administrators of group home facilities, id. § 1522.41.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 79:**

22 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
23 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
24 plural form “laws” and the terms “administrators” and “group health facilities.” Plaintiffs further  
25 object to the Request on the grounds and to the extent that it calls for a legal conclusion and thus does  
26 not require an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Health & Safety  
27 Code § 1522.41 is part of the law of California. Except as expressly admitted, Plaintiffs deny this  
28 Request for Admission.

1 **REQUEST FOR ADMISSION NO. 80:**

2 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
3 basis of sexual orientation in adult day health care centers, id. § 1586.7.

4 **RESPONSE TO REQUEST FOR ADMISSION NO. 80:**

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
7 plural form "laws" and the term "adult day health care centers." Plaintiffs further object to the  
8 Request on the grounds and to the extent that it calls for a legal conclusion and thus does not require  
9 an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Cal. Health & Safety Code  
10 § 1586.7 is part of the law of California. Except as expressly admitted, Plaintiffs deny this Request  
11 for Admission.

12 **REQUEST FOR ADMISSION NO. 81:**

13 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
14 basis of sexual orientation in community redevelopment projects, id. § 33050(a).

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

16 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
17 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
18 term "community redevelopment projects." Plaintiffs further object to the Request on the grounds  
19 and to the extent that it calls for a legal conclusion and thus does not require an answer. Subject to  
20 the foregoing objections, Plaintiffs admit that Cal. Health & Safety Code § 33050(a) is part of the law  
21 of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

22 **REQUEST FOR ADMISSION NO. 82:**

23 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
24 basis of sexual orientation in court-ordered HIV-status disclosure of criminal defendants, id.  
25 § 120292.

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

27 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
28 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the

1 plural form “laws” and the term “HIV-status disclosure.” Plaintiffs further object to the Request on  
2 the grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
3 Subject to the foregoing objections, Plaintiffs admit that Cal. Health & Safety Code § 120292 is part  
4 of the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 83:**

6 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
7 basis of sexual orientation in sexual health education programs, id. § 151002(a)(6).

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

9 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
10 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
11 plural form “laws” and the term “sexual health education programs.” Plaintiffs further object to the  
12 Request on the grounds and to the extent that it calls for a legal conclusion and thus does not require  
13 an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Health & Safety Code  
14 § 151002(a)(6) is part of the law of California. Except as expressly admitted, Plaintiffs deny this  
15 Request for Admission.

16 **REQUEST FOR ADMISSION NO. 84:**

17 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
18 basis of sexual orientation in insurance, Cal. Ins. Code §§ 10140(a), (e), 10141.

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

20 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
21 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
22 term “licensing boards.” Plaintiffs further object to the Request on the grounds and to the extent that  
23 it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
24 objections, Plaintiffs admit that Cal. Ins. Code §§ 10140(a), (e), 10141 are part of the law of  
25 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

26 **REQUEST FOR ADMISSION NO. 85:**

27 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
28 basis of sexual orientation in children’s public health insurance, id. § 12693.28.



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

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
4 plural form “laws” and the term “children’s public health insurance.” Plaintiffs further object to the  
5 Request on the grounds and to the extent that it calls for a legal conclusion and thus does not require  
6 an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Insurance Code § 12693.28  
7 is part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
8 Admission.

9 **REQUEST FOR ADMISSION NO. 86:**

10 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
11 basis of sexual orientation in health care organizations, Cal. Lab Code § 4600.6(g)(3).

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

13 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
15 plural form “laws” and the term “health care organizations.” Plaintiffs further object to the Request  
16 on the grounds and to the extent that it calls for a legal conclusion and thus does not require an  
17 answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Labor Code § 4600.6(g)(3) is  
18 part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
19 Admission.

20 **REQUEST FOR ADMISSION NO. 87:**

21 Admit that California’s elected legislature has passed laws prohibiting discrimination on the  
22 basis of sexual orientation in public contractors, Cal. Pub. Contract Code § 6108(g)(9).

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

24 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
25 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
26 plural form “laws” and the term “public contractors.” Plaintiffs further object to the Request on the  
27 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
28

1 Subject to the foregoing objections, Plaintiffs admit that Cal. Pub. Contract Code § 6108(g)(9) is part  
2 of the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

3 **REQUEST FOR ADMISSION NO. 88:**

4 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
5 basis of sexual orientation in juvenile detention, Cal. Wel. & Inst. Code § 224.73.

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

7 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
8 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
9 plural form "laws" and the term "juvenile detention." Plaintiffs further object to the Request on the  
10 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.

11 Subject to the foregoing objections, Plaintiffs admit that Cal. Wel. & Inst. Code § 224.73 is part of  
12 the law of California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

13 **REQUEST FOR ADMISSION NO. 89:**

14 Admit that California's elected legislature has passed laws prohibiting discrimination on the  
15 basis of sexual orientation in access to elder services, Cal. Wel. & Inst. Code § 9103.1(a), (c), (d).

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

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
18 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
19 plural form "laws" and the term "elder services." Plaintiffs further object to the Request on the  
20 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.

21 Subject to the foregoing objections, Plaintiffs admit that Cal. Wel. & Inst. Code § 9103.1(a), (c), and  
22 (d) are part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
23 Admission.

24 **REQUEST FOR ADMISSION NO. 90:**

25 Admit that California has acted to protect and advance gay and lesbian rights by combating  
26 bias on the basis of sexual orientation in public schools, Cal. Ed. Code § 32228.

27  
28

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

1 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 2 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 3 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “combating,” “bias” and “public  
 4 schools.” Plaintiffs further object to the Request on the grounds and to the extent that it calls for a  
 5 legal conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs  
 6 admit that Cal. Ed. Code § 32228 is part of the law of California. Except as expressly admitted,  
 7 Plaintiffs deny this Request for Admission.  
 8

**REQUEST FOR ADMISSION NO. 91:**

9 Admit that California has acted to protect and advance gay and lesbian rights by providing  
 10 sexual orientation-sensitive sex education materials, id. § 51933(b)(4).  
 11

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

12 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 13 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 14 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “providing,” “sexual-orientation-  
 15 sensitive” and “sex education materials.” Plaintiffs further object to the Request on the grounds and  
 16 to the extent that it calls for a legal conclusion and thus does not require an answer. Subject to the  
 17 foregoing objections, Plaintiffs admit that Cal. Ed. Code § 51933(b)(4) is part of the law of  
 18 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.  
 19

**REQUEST FOR ADMISSION NO. 92:**

20 Admit that California has acted to protect and advance gay and lesbian rights by protecting  
 21 privacy interests in sexual orientation for teachers. id. § 49091.24.  
 22

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

23 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 24 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 25 terms “acted,” “protect,” or “protecting,” “advance,” “gay and lesbian rights,” and “teachers.”  
 26 Plaintiffs further object to the Request on the grounds and to the extent that it calls for a legal  
 27 conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit  
 28

1 that Cal. Ed. Code § 49091.24 is part of the law of California. Except as expressly admitted,  
2 Plaintiffs deny this Request for Admission.

3 **REQUEST FOR ADMISSION NO. 93:**

4 Admit that California has acted to protect and advance gay and lesbian rights by providing  
5 training for domestic abuse evaluators in the relationship of sexual orientation to domestic violence,  
6 Cal. Fam. Code § 1816.

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

8 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
9 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
10 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “providing,” “training,” “domestic  
11 abuse evaluators,” “relationship” and “domestic violence.” Plaintiffs further object to the Request on  
12 the grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
13 Subject to the foregoing objections, Plaintiffs admit that Cal. Fam. Code § 1816 is part of the law of  
14 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

15 **REQUEST FOR ADMISSION NO. 94:**

16 Admit that California has acted to protect and advance gay and lesbian rights by facilitating  
17 communication on sexual orientation in disability communities, Cal. Gov. Code § 8299.01(b)(2)(F).

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

19 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
20 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
21 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “facilitating,” “communication” and  
22 “disability communities.” Plaintiffs further object to the Request on the grounds and to the extent  
23 that it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
24 objections, Plaintiffs admit that Cal. Government Code § 8299.01(b)(2)(F) is part of the law of  
25 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

26 **REQUEST FOR ADMISSION NO. 95:**

27 Admit that California has acted to protect and advance gay and lesbian rights by issuing  
28 publications to minimize housing discrimination on the basis of sexual orientation, id. § 12930(i).

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

1 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 2 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 3 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “issuing,” “publications,” “minimize”  
 4 and “housing discrimination.” Plaintiffs further object to the Request on the grounds and to the  
 5 extent that it calls for a legal conclusion and thus does not require an answer. Subject to the  
 6 foregoing objections, Plaintiffs admit that Cal. Government Code § 12930(i) is part of the law of  
 7 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

**REQUEST FOR ADMISSION NO. 96:**

9 Admit that California has acted to protect and advance gay and lesbian rights by providing  
 10 assistance in resolving disputes relating to discrimination on the basis of sexual orientation, id.  
 11 § 12931.  
 12

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

13 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 14 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 15 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “providing,” “assistance,” “resolving,”  
 16 and “disputes.” Plaintiffs further object to the Request on the grounds and to the extent that it calls  
 17 for a legal conclusion and thus does not require an answer. Subject to the foregoing objections,  
 18 Plaintiffs admit that Cal. Government Code § 12931 is part of California law. Except as expressly  
 19 admitted, Plaintiffs deny this Request for Admission.  
 20

**REQUEST FOR ADMISSION NO. 97:**

21 Admit that California has acted to protect and advance gay and lesbian rights by funding  
 22 advisory and conciliation councils to study sexual orientation discrimination generally and in housing  
 23 and employment, id. § 12935(g).  
 24

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

25 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 26 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 27 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “funding,” “advisory,” “conciliation,”  
 28

1 “councils,” “study” and “generally.” Plaintiffs further object to the Request on the grounds and to the  
 2 extent that it calls for a legal conclusion and thus does not require an answer. Subject to the  
 3 foregoing objections, Plaintiffs admit that Cal. Government Code § 12935(g) is part of the law of  
 4 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 98:**

6 Admit that California has acted to protect and advance gay and lesbian rights by empowering  
 7 local commissions on human relations to study and resolve tensions between people subject to  
 8 prejudice on the basis of sexual orientation, id. §§ 50264(c), 50265(a).

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

10 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 11 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 12 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “empowering,” “local commissions,”  
 13 “on,” “human relations,” “study,” “resolve,” “tensions,” “people,” “subject” and “prejudice.”  
 14 Plaintiffs further object to the Request on the grounds and to the extent that it calls for a legal  
 15 conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit  
 16 that Cal. Government Code § 50264(c) is part of the law of California. Except as expressly admitted,  
 17 Plaintiffs deny this Request for Admission.

18 **REQUEST FOR ADMISSION NO. 99:**

19 Admit that California has acted to protect and advance gay and lesbian rights by training  
 20 medical personnel in sexual orientation discrimination prevention, Cal. Health & Saf. Code § 1257.5.

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

22 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
 23 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
 24 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “training,” “medical personnel” and  
 25 “discrimination prevention.” Plaintiffs further object to the Request on the grounds and to the extent  
 26 that it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
 27 objections, Plaintiffs admit that Cal. Health & Saf. Code § 1257.5 is part of the law of California.  
 28 Except as expressly admitted, Plaintiffs deny this Request for Admission.

1 **REQUEST FOR ADMISSION NO. 100:**

2 Admit that California has acted to protect and advance gay and lesbian rights by training  
3 foster parents and group home and foster family agency licensing personnel in sexual orientation  
4 discrimination and harassment prevention, id. §§ 1522.41(b)(3)(F), (b)(4)(E), § 1563(c)(5), Cal. Wel.  
5 & Inst. Code § 16003(a)(1).

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

7 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
8 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
9 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “training,” “foster parents,” “group  
10 home,” “foster family licensing personnel,” “sexual discrimination” and “harassment.” Plaintiffs  
11 further object to the Request on the grounds and to the extent that it calls for a legal conclusion and  
12 thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit that Cal.  
13 Government Code §§ 1522.41(b)(3)(F), (b)(4)(E), § 1563(c)(5) and Cal. Wel. & Inst. Code  
14 § 16003(a)(1) are part of the law of California. Except as expressly admitted, Plaintiffs deny this  
15 Request for Admission.

16 **REQUEST FOR ADMISSION NO. 101:**

17 Admit that California has acted to protect and advance gay and lesbian rights by training law  
18 enforcement personnel about crimes committed on the basis of the sexual orientation of the victim,  
19 Cal. Pen Code §§ 13023, 13519.6.

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

21 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
22 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
23 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “training,” “law enforcement  
24 personnel,” “about,” “crimes,” “basis” and “victim.” Plaintiffs further object to the Request on the  
25 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
26 Subject to the foregoing objections, Plaintiffs admit that Cal. Pen. Code § 13023 and Cal. Pen. Code  
27 § 13519.6 are part of the law of California. Except as expressly admitted, Plaintiffs deny this  
28 Request for Admission.

1 **REQUEST FOR ADMISSION NO. 102:**

2 Admit that California has acted to protect and advance gay and lesbian rights by training law  
3 enforcement personnel about sensitivity to sexual orientation, id. §§ 13023, 13519.4.

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

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
7 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “training,” “law enforcement  
8 personnel” and “sensitivity.” Plaintiffs further object to the Request on the grounds and to the extent  
9 that it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
10 objections, Plaintiffs admit that Cal. Pen. Code § 13023 is part of the law of California. Except as  
11 expressly admitted, Plaintiffs deny this Request for Admission.

12 **REQUEST FOR ADMISSION NO. 103:**

13 Admit that California has acted to protect and advance gay and lesbian rights by recognizing  
14 the right of children to be free from sexual orientation discrimination, Cal. Wel. & Inst. Code  
15 § 224.71

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

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
18 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
19 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “recognizing,” “rights,” and “free.”  
20 Plaintiffs further object to the Request on the grounds and to the extent that it calls for a legal  
21 conclusion and thus does not require an answer. Subject to the foregoing objections, Plaintiffs admit  
22 that Cal. Wel. & Inst. Code § 224.71 is part of the law of California. Except as expressly admitted,  
23 Plaintiffs deny this Request for Admission.

24 **REQUEST FOR ADMISSION NO. 104:**

25 Admit that California has acted to protect and advance gay and lesbian rights by codifying  
26 protections against hate crimes committed on the basis of sexual orientation, Cal. Pen Code  
27 §§ 422.55(a)(6), 422.6, 422.7, 422.75, 422.7, 422.85, 422.865, § 3053.4, Cal. Ed. Code §§ 66301,  
28 67380, 94367, Cal. Wel. & Inst. Code § 707(d)(2)(C)(iii).



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

1  
2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
4 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “codifying,” “protections,” “hate  
5 crimes” and “committed.” Plaintiffs further object to the Request on the grounds and to the extent  
6 that it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
7 objections, Plaintiffs admit that Cal. Cal. Pen Code §§ 422.55(a)(6), 422.6, 422.7, 422.75, 422.7,  
8 422.85, 422.865, § 3053.4, Cal. Ed. Code §§ 66301, 67380, 94367, and Cal. Wel. & Inst. Code  
9 § 707(d)(2)(C)(iii) are part of the law of California. Except as expressly admitted, Plaintiffs deny this  
10 Request for Admission.

**REQUEST FOR ADMISSION NO. 105:**

11  
12 Admit that California has acted to protect and advance gay and lesbian rights by protecting  
13 against harmful insurance premium adjustment following hate crime-related claims, Cal. Ins. Code  
14 § 676.10.

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

15  
16 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
17 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
18 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “protecting,” “harmful,” “insurance  
19 premium adjustment” and “hate crime-related claims.” Plaintiffs further object to the Request on the  
20 grounds and to the extent that it calls for a legal conclusion and thus does not require an answer.  
21 Subject to the foregoing objections, Plaintiffs admit that Cal. Ins. Code § 676.10 is part of the law of  
22 California. Except as expressly admitted, Plaintiffs deny this Request for Admission.

**REQUEST FOR ADMISSION NO. 106:**

23  
24 Admit that California has acted to protect and advance gay and lesbian rights by recognizing  
25 the right of persons of any sexual orientation to be free from fear and harm by gangs, Cal. Pen Code  
26 §§ 186.21, 11410.  
27  
28

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

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
4 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “recognizing,” “rights,” “free,” “fear,”  
5 “harm” and “gangs.” Plaintiffs further object to the Request on the grounds and to the extent that it  
6 calls for a legal conclusion and thus does not require an answer. Subject to the foregoing objections,  
7 Plaintiffs admit that Cal. Pen. Code § 186.21 and § 11410 are part of the law of California. Except as  
8 expressly admitted, Plaintiffs deny this Request for Admission.

9 **REQUEST FOR ADMISSION NO. 107:**

10 Admit that California has acted to protect and advance gay and lesbian rights by providing for  
11 jury instructions prohibiting bias on the basis of sexual orientation, Cal. Pen Code § 1127h.

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

13 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous, in particular with respect to the use of the  
15 terms “acted,” “protect,” “advance,” “gay and lesbian rights,” “providing,” “jury instructions,”  
16 “prohibiting,” and “bias.” Plaintiffs further object to the Request on the grounds and to the extent  
17 that it calls for a legal conclusion and thus does not require an answer. Subject to the foregoing  
18 objections, Plaintiffs admit that Cal. Pen. Code § 1127h is part of the law of California. Except as  
19 expressly admitted, Plaintiffs deny this Request for Admission.

20 **REQUEST FOR ADMISSION NO. 108:**

21 Admit that California municipalities provide additional protections and benefits to same-sex  
22 partners.

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

24 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
25 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
26 Plaintiffs lack knowledge sufficient to admit or deny whether California municipalities provide  
27 additional protections and benefits to same-sex partners.

28

1 **REQUEST FOR ADMISSION NO. 109:**

2 Admit that California employers are required by law to grant healthcare benefits to same-sex  
3 domestic partners on equal footing with employees' spouses. Cal. Ins. Code sec. 381.5.

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

5 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs object to  
6 this Request on the grounds that it is vague, ambiguous and unintelligible, in particular with respect  
7 to the use of the terms "required," "healthcare benefits," and "equal footing." Plaintiffs further object  
8 to the Request on the grounds and to the extent that it calls for a legal conclusion and thus does not  
9 require an answer. Subject to the foregoing objections, Plaintiffs admit that Cal. Ins. Code § 381.5 is  
10 part of the law of California. Except as expressly admitted, Plaintiffs deny this Request for  
11 Admission.

12 **REQUEST FOR ADMISSION NO. 110:**

13 Admit that California is one of sixteen states that mandate health insurance coverage for  
14 domestic partners. Council for Affordable Health Insurance, Health Insurance Mandates in the States  
15 2009 at 7, 19, [http://www.cahi.org/cahi\\_contents/resources/pdf/HealthInsuranceMandates2009.pdf](http://www.cahi.org/cahi_contents/resources/pdf/HealthInsuranceMandates2009.pdf).

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

17 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
18 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
19 use of the term "mandate" and the phrase "health insurance." Plaintiffs also object to this Request on  
20 the grounds and to the extent that it may not be relevant to any party's claim or defense in this action  
21 or reasonably calculated to lead to the discovery of admissible evidence. Plaintiffs further respond  
22 that they lack knowledge or information sufficient to admit or deny the authenticity or accuracy of  
23 the information contained on the web page cited in Request No. 110. Subject to the foregoing  
24 objections, Plaintiffs admit that the web page cited in Defendant-Intervenors' Request for Admission  
25 No. 110 contains a 27 page document entitled "Health Insurance Mandates in the States 2009."  
26 Plaintiffs lack knowledge or information sufficient to admit or deny the remainder of the Request.

1 **REQUEST FOR ADMISSION NO. 111:**

2 Admit that even before they were legally obligated to do so, many major California employers  
3 granted benefits to same-sex partners and registered domestic partners.

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

5 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
6 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
7 Plaintiffs lack knowledge or information sufficient to admit or deny this Request.

8 **REQUEST FOR ADMISSION NO. 112:**

9 Admit that a majority of Fortune 500 companies offer same-sex domestic partner benefits.

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

11 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
12 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
13 Plaintiffs lack knowledge or information sufficient to admit or deny this Request.

14 **REQUEST FOR ADMISSION NO. 113:**

15 Admit that the only type of relationship that is capable of producing biological offspring is  
16 that between a man and a woman.

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

18 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
19 this Request on the grounds that it is vague and ambiguous, particularly with respect to the phrase  
20 “biological offspring.” Subject to the foregoing objections, Plaintiffs deny this Request for  
21 Admission.

22 **REQUEST FOR ADMISSION NO. 114:**

23 Admit that less than 40% of same-sex couples in the United States aged 22-55 have children  
24 under 18 in the home. R. Bradley Sears, et al., *Same-Sex Couples and Same-Sex Couples Raising*  
25 *Children in the United States: Data from Census 2000* at 11.

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

2 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
4 Plaintiffs lack knowledge or information sufficient to admit or deny this Request.

5 **REQUEST FOR ADMISSION NO. 115:**

6 Admit that Sixty-eight percent of married couples aged 22-55 have children under 18 in the  
7 home. *Id.*

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

9 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
10 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
11 Plaintiffs lack knowledge or information sufficient to admit or deny this Request.

12 **REQUEST FOR ADMISSION NO. 116:**

13 Admit that children of same-sex couples are never biologically related to both of their parents.

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

15 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
16 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
17 Plaintiffs deny this Request for Admission.

18 **REQUEST FOR ADMISSION NO. 117:**

19 Admit that children of same-sex couples are less likely to be biologically related to any of  
20 their parents than are the children of opposite-sex couples.

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

22 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
23 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
24 Plaintiffs deny this Request for Admission.

25 **REQUEST FOR ADMISSION NO. 118:**

26 Admit that there is a strong natural bond between biological parents and their children.  
27  
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 118:**

2 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
3 this Request on the grounds that it is vague and ambiguous. Subject to the foregoing objections,  
4 Plaintiffs deny this Request for Admission.

5 **REQUEST FOR ADMISSION NO. 119:**

6 Admit that children have a natural desire to know and have a relationship with their biological  
7 parents.

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

9 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
10 this Request on the grounds that it is vague, ambiguous and calls for expert testimony, which is not  
11 yet subject to discovery. Subject to the foregoing objections, Plaintiffs deny this Request for  
12 Admission.

13 **REQUEST FOR ADMISSION NO. 120:**

14 Admit that international law recognizes that “as far as possible, [a child has the] right to know  
15 and be cared for by his or her parents.” United Nations Convention on the Rights of the Child, Art. 7,  
16 Nov. 20, 1989, 28 I. L. M. 1448, 1460.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 120:**

18 Plaintiffs incorporate their General Objections as if set forth fully herein. Plaintiffs further  
19 object to this Request on the grounds that it is vague and ambiguous, in particular with respect to its  
20 use of the terms “international law” and “recognizes” Plaintiffs also object to this Request on the  
21 grounds and to the extent that it may not be relevant to any party’s claim or defense in this action or  
22 reasonably calculated to lead to the discovery of admissible evidence. Subject to the foregoing  
23 objections, Plaintiffs admit that the United Nations Convention on the Rights of the Child, Art. 7(1)  
24 states, in part, “The child shall be registered immediately after birth and shall have the right from  
25 birth to a name, the right to acquire a nationality and, as far as possible, the right to know and be  
26 cared for by his or her parents.” Except as expressly admitted, Plaintiffs deny this Request for  
27 Admission.

28

1 **REQUEST FOR ADMISSION NO. 121:**

2 Admit that many gays and lesbians desire to have biological children.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 121:**

4 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
5 this Request on the grounds that it is vague and ambiguous, particularly with respect to the word  
6 “many.” Subject to the foregoing objections, Plaintiffs admit that, like heterosexual individuals,  
7 some gay and lesbian individuals desire to have biological children and some do not. Except as  
8 expressly admitted, Plaintiffs deny this Request for Admission.

9 **REQUEST FOR ADMISSION NO. 122:**

10 Admit that by taking advantage of technological advancements and through other means,  
11 many gay and lesbian individuals are fulfilling their desires to have biological children.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 122:**

13 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous, particularly with respect to the word  
15 “many.” Subject to the foregoing objections, Plaintiffs admit that, like some heterosexual  
16 individuals, some gay and lesbian individuals are taking advantage of technological advancements  
17 and other means to have biological children. Except as expressly admitted, Plaintiffs deny this  
18 Request for Admission.

19 **REQUEST FOR ADMISSION NO. 123:**

20 Admit that from the beginning of California’s statehood, the legal institution of civil marriage  
21 has been understood to refer to a relationship between a man and a woman, excepting the brief period  
22 of time between the California Supreme Court’s decision in the *Marriage Cases* and the passage of  
23 Proposition 8.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 123:**

25 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
26 this Request on the grounds that it is vague, ambiguous and calls for expert testimony, which is not  
27 yet subject to discovery. Plaintiffs further object to this Request on the grounds that it is compound.  
28 Subject to the foregoing objections, Plaintiffs deny the Request for Admission.

1 **REQUEST FOR ADMISSION NO. 124:**

2 Admit that civil marriage has been a remarkably static institution; that it has rarely changed  
3 throughout history, and then only in minor ways; and that despite any changes in its precise contours,  
4 it always has been and nearly always still is limited to the union of a man and a woman.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 124:**

6 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
7 this Request on the grounds that it is vague and ambiguous, particularly with respect to the phrase  
8 “remarkably static,” “rarely” and “minor.” Plaintiffs further object to this Request on the grounds  
9 that it is compound and calls for expert testimony, which is not yet subject to discovery. Subject to  
10 the foregoing objections, Plaintiffs deny the Request for Admission.

11 **REQUEST FOR ADMISSION NO. 125:**

12 Admit that the framers and ratifiers of the 14th Amendment did not intend to require states to  
13 extend the institution of marriage to same-sex relationships, nor did they understand the 14th  
14 Amendment to do so.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 125:**

16 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
17 this Request on the grounds that it is vague and ambiguous. Plaintiffs further object to this Request  
18 on the grounds that it is compound and calls for expert testimony, which is not yet subject to  
19 discovery. Subject to the foregoing objections, Plaintiffs deny Request No. 125.

20 **REQUEST FOR ADMISSION NO. 126:**

21 Admit that at the time of the framing and ratification of the Fourteenth Amendment, civil  
22 marriage was uniformly defined in law and understood by the public to encompass only opposite-sex  
23 relationships.

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 126:**

25 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
26 this Request on the grounds that it is vague and ambiguous, particularly with respect to the phrase  
27 “civil marriage” and as to scope. Plaintiffs further object to this Request on the grounds that it is  
28 compound and calls for expert testimony, which is not yet subject to discovery. Subject to the



1 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny the  
2 Request for Admission.

3 **REQUEST FOR ADMISSION NO. 127:**

4 Admit that dictionaries from the time of the framing and ratification of the 14th Amendment  
5 uniformly defined marriage as the union of a man and a woman; and that no dictionary definition of  
6 marriage from that time included same-sex relationships.

7 **RESPONSE TO REQUEST FOR ADMISSION NO. 127:**

8 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
9 this Request on the grounds that it is vague, ambiguous and calls for expert testimony, which is not  
10 yet subject to discovery. Plaintiffs further object to this Request on the grounds that it is compound.  
11 Subject to the foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or  
12 deny Request No. 127.

13 **REQUEST FOR ADMISSION NO. 128:**

14 Admit that at the time of the framing and ratification of the 14th Amendment, not a single  
15 State recognized same-sex relationships as marriages.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 128:**

17 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
18 this Request on the grounds that it is vague, ambiguous and calls for expert testimony, which is not  
19 yet subject to discovery. Plaintiffs further object to this Request on the grounds that it is compound.  
20 Subject to the foregoing objections, Subject to the foregoing objections, Plaintiffs lack knowledge or  
21 information sufficient to admit or deny Request No. 128.

22 **REQUEST FOR ADMISSION NO. 129:**

23 Admit that the debates accompanying the framing and ratification of the 14th Amendment  
24 contain no discussion of extending marriage to include same-sex relationships.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 129:**

26 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
27 this Request on the grounds that it is vague and ambiguous. Plaintiffs further object to this Request  
28

1 on the grounds that it is compound. Subject to the foregoing objections, Plaintiffs lack knowledge or  
2 information sufficient to admit or deny Request No. 129.

3 **REQUEST FOR ADMISSION NO. 130:**

4 Admit that the proponents of Proposition 8 submitted 1,120,801 signatures to the Secretary of  
5 State on April 24, 2008 to qualify the initiative for the fall general election ballot.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 130:**

7 Plaintiffs incorporate their General Objections as if fully set forth herein. Subject to the  
8 foregoing objections, Plaintiffs lack knowledge or information sufficient to admit or deny Request  
9 No. 130.

10 **REQUEST FOR ADMISSION NO. 131:**

11 Admit that Proposition 8 restored the traditional definition of marriage.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 131:**

13 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
14 this Request on the grounds that it is vague and ambiguous, particularly with respect to the words  
15 “traditional” and “restored.” Plaintiffs further object to this Request on the grounds that it is  
16 compound. Subject to the foregoing objections, Plaintiffs deny this Request for Admission.

17 **REQUEST FOR ADMISSION NO. 132:**

18 Admit that Proposition 8 was intended to restore the traditional definition of marriage.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 132:**

20 Plaintiffs incorporate their General Objections as if fully set forth herein. Plaintiffs object to  
21 this Request on the grounds that it is vague and ambiguous, particularly with respect to the words  
22 “traditional” and “restored.” Plaintiffs further object to this Request on the grounds that it is  
23 compound. Subject to the foregoing objections, Plaintiffs deny this Request for Admission.

24 **REQUEST FOR ADMISSION NO. 133:**

25 Admit that on May 15, 2008, the California Supreme Court decided *In re Marriage Cases*,  
26 183 P.3d 384 (Cal. 2008).

27  
28

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 133:**

2 Plaintiffs incorporate their General Objections as if set forth fully herein. Subject to the  
3 foregoing objections, Plaintiffs admit that the California Supreme Court issued its decision in *In re*  
4 *Marriage Cases*, 183 P.3d 384 (Cal. 2008) on May 15, 2008.

5 **REQUEST FOR ADMISSION NO. 134:**

6 Admit that the California Secretary of State certified Proposition 8 for the November 4, 2008  
7 general election ballot on June 2, 2008.

8 **RESPONSE TO REQUEST FOR ADMISSION NO. 134:**

9 Plaintiffs incorporate their General Objections as if fully set forth herein. Subject to the  
10 foregoing objections, Plaintiffs admit that Proposition 8 was certified for the November 4, 2008  
11 general election ballot on June 2, 2008.

12 DATED: September 16, 2009

GIBSON, DUNN & CRUTCHER LLP

13  
14 By: \_\_\_\_\_/s/Ethan D. Dettmer  
15 Ethan D. Dettmer

16 and

17 BOIES, SCHILLER & FLEXNER LLP

18 David Boies

19 Attorneys for Plaintiffs KRISTIN M. PERRY,  
20 SANDRA B. STIER, PAUL T. KATAMI, and  
21 JEFFREY J. ZARRILLO