

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

ROBERT STEINBUCH,)	
)	
Plaintiff,)	
)	
v.)	Case No. 1:05-CV-970 (PLF)
)	Judge Paul L. Friedman
JESSICA CUTLER,)	
)	
Defendant)	
_____)	

**DEFENDANT’S RESPONSES AND OBJECTIONS
TO PLAINTIFF’S FIRST SET OF INTERROGATORIES**

COMES NOW Jessica Cutler and responds to the Plaintiff’s First Interrogatories as follows:

General Statements

A. The Responses set forth herein constitute the best information presently available to the Defendant. However, the Defendant has not completed its discovery and/or investigation of the facts underlying this lawsuit, nor has it completed its preparation of this case for trial. Accordingly, these Responses are provided without prejudice to the Defendant’s right to amend, supplement or change said Responses if and when additional, different or more accurate information becomes available. Moreover, said Responses are subject to correction for inadvertent errors or omissions, if any such errors or omissions are

later found to exist.

B. By responding to these Interrogatories, the Defendant does not waive any objections which may be appropriate to the use, for any purpose, of any of the information contained in the Defendant's Responses to these Interrogatories, or to the admissibility, relevancy, or materiality of any such information as to any issue in this case.

C. Where applicable, these Responses are intended to supplement the Defendant's Responses to Mandatory Interrogatories.

Standing Objections

A. The Defendant objects to Plaintiff's Interrogatories insofar as said Interrogatories seek the disclosure of the Defendant's attorneys' or any other of Defendant's representatives mental impressions, conclusions, opinions, computations, calculations, projections, reasoning, legal theories, or other work product, on the grounds that said Interrogatories exceed the scope of permissible discovery under the Federal Rules of Civil Procedure.

B. The Defendant objects to Plaintiff's Interrogatories insofar as said Interrogatories are unduly burdensome or are calculated or would otherwise operate to annoy, embarrass, oppress or cause undue expense to the Defendant or to any individual not a party to this action on the grounds that said Interrogatories exceed the scope of permissible discovery under the Federal Rules of Civil

Procedure.

C. The Defendant objects to Plaintiff's Interrogatories insofar as said Interrogatories would require the Defendant to respond by acquiring or supplying information which would be irrelevant and immaterial to the subject matter or issues of this action, and not reasonably calculated to lead to the discovery of admissible evidence on the grounds that said Interrogatories exceed the scope of permissible discovery under the Federal Rules of Civil Procedure.

Subject to and without waiver of the foregoing objection, Defendant's Responds to Defendant's First Interrogatories as follows:

Interrogatory No. 1

Provide all identity information, including contact information, for each and every person referenced in the Washingtonienne blog.

Response to Interrogatory No. 1

The Plaintiff objects to this Interrogatory insofar as said Interrogatory is unduly burdensome or is calculated or would otherwise operate to annoy, embarrass, oppress or cause undue expense to the Plaintiff or to any individual not a party to this action on the grounds that said Interrogatory exceeds the scope of permissible discovery under the Federal Rules of Civil Procedure. The Plaintiff objects to this Interrogatory insofar as the Interrogatory would require the Plaintiff to respond by acquiring or supplying information which would be irrelevant and

immaterial to the subject matter or issues of this action, and not reasonably calculated to lead to the discovery of admissible evidence on the grounds that said Requests exceed the scope of permissible discovery under the Federal Rules of Civil Procedure.

Interrogatory No. 2

_____ Provide all identity information, including contact information, for each and every person who Defendant informed of, directly or indirectly, directed to, directly or indirectly, or granted permission to access or forward the Washingtoniense blog and/or link, directly or indirectly.

Response to Interrogatory No. 2

Alexandra Mace DeLuca
Carlsbad, CA
760-720-1428 home
760-470-6580 cell
alexandradeluca@juno.com

Ms. Deluca provided access to James Slattery

Rachel Robertson
203 Fairmont Court
Nashville, TN 37203
rachel.robertson@vanderbilt.edu
718-710-9699 cell

Alethea Scally
Washington DC
Works for Congressman Raul Grijalva
alethea.scally@mail.house.gov
202-225-2435 work

Interrogatory No. 3

Provide all identity information, including contact information, for each and every person who paid rent, in part or whole, directly and/or indirectly, for the residences, including apartments, that Defendant lived or resided in since January 2000.

Response to Interrogatory No. 3

Plaintiff objects to this interrogatory on the basis and to the extent that it is overbroad, unduly burdensome, harassing, and seeks information which is not reasonably calculated to lead to the discovery of admissible evidence.

Respectfully submitted, August 29, 2006.

Matthew C. Billips
Georgia Bar No. 057110

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CERTIFICATE OF SERVICE

This is to certify that I have on this day served copies of the attached **“DEFENDANT’S RESPONSES AND OBJECTIONS TO PLAINTIFF’S FIRST SET OF INTERROGATORIES”** by depositing a copy of same in the United States mail with adequate postage thereon, addressed as follows:

Jonathan Rosen, Esq.
1645 Lamington Road
Bedminster, New York 07921

This _____ day of August, 2006.

Matthew C. Billips
Georgia Bar No. 057110

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