

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 SECOND 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 the name and, if known, the address and telephone number of each individual likely to have discoverable information that the Defendant may use to support her claims or defenses.

Response Interrogatory No. 1

Please see Defendant's Response to Plaintiff's First Interrogatories No. 2. In further response, various individuals whose identities are not presently known to or whose identities Defendant cannot present recall have information regarding Plaintiff's disclosure of the existence of and details concerning his sexual relationship with Defendant. Responding further, the discovery stay has only recently been lifted and Defendant anticipates that she may supplement this

response upon discovery of additional information from the Steinbuch v. Kappel matter or as discovery progresses in this case.

Interrogatory No. 2

_____ Provide all identify information, including contact information, for any individual or entity who Defendant believes may have informed the Wonkette, Ana Marie Cox, or anybody else about the Washingtonienne Blog and/or the existence thereof prior to May 19, 2004.

Response to Interrogatory No. 2

The Defendant objects to this Interrogatory insofar as said Interrogatory asks Defendant to speculate regarding matters outside of her personal knowledge, information, or belief on the grounds that said Interrogatory exceeds the scope of permissible discovery under the Federal Rules of Civil Procedure. Subject to and without waiver of the foregoing objections, Defendant responds as follows:

Defendant does not know who may have sent the Washingtonienne Blog to Ana Marie Cox or notified her of its existence. Defendant informed three people, her friends, of the blog. One of those individuals informed her ex-boyfriend. Those identities have previously been provided. Prior to May 18, 2004, when she was informed that a link to the Washingtonienne Blog was posted on Wonkette, Defendant was unaware of any other person having access to or knowledge of this Blog.

This 6th day of September, 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 SECOND 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 Jersey 07921

This _____ day of September, 2006.

Matthew C. Billips
Georgia Bar No. 057110

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