

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

FILED
IN CLERKS OFFICE

2007 DEC -3 P 1:59

U.S. DISTRICT COURT
DISTRICT OF MASS.

WILLIAM V. AGUIAR)

Plaintiff)

v.)

FLOYD WEBB, BARRON SHEPPARD,)

WENDY SHEPPARD and ASHIDA)

KIM a.k.a. RADFORD DAVIS and)

a.k.a. CHRISTOPHER HUNTER)

Defendants)

Civil Action No. 07-11673-MLW

**RESPONSE OF DEFENDANT RADFORD DAVIS TO
PLAINTIFF INTERROGATORIES AND REQUEST FOR DOCUMENTS**

1. Federal Tax Return's 2006 to 2001

Response to Item 1: Defendant Davis objects and declines to provide stipulated items to Plaintiff on the grounds that Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such records nor their safe return. Defendant has previously filed a Statement of Financial Poverty (Exhibit 1)

2. All book's from Ashida Kim.com / Dojo Press

Response to Item 2: Defendant Davis objects and declines to provide said items. Dojo Press has a catalog of over eighty pamphlets. NONE are related in any way to this cause of action. Which, as repeated stated by Plaintiff, deals only with DVDs posted on YouTube. This is demonstrated by Item 6 of Defendant's previous filing dated 31 October, 2007. This is merely Plaintiff's attempt to harass and expand his complaint without due cause or justification, per argument of Brandy Karl in a previous filing on behalf of Defendant Webb.

3. All video's from Ashida Kim .com / Dojo Press

Response to Item 3: Defendant Davis objects and declines to provide said items. Dojo Press has a catalog of twenty-five videos. NONE are related in any way to this cause of action. Which, as repeated stated by Plaintiff, deals only with DVDs posted on YouTube. As demonstrated by Item 6 of Defendant's previous filing dated 31 October, 2007, Defendant has complied with even the most unreasonable demands of Plaintiff to exclude any intellectual property he feels may have been infringed upon.. This is merely Plaintiff's attempt to harass and unlawfully expand his complaint without due cause or justification, per argument of Brandy Karl in previous filing on behalf of Defendant Webb.

4. All bank receipts from Ashida Kim / Radford Davis / Dojo Press / Ashida Kim .com

Response to Item 4: Defendant Davis objects and declines to provide said bank receipts to Plaintiff since Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such receipts nor their safe return.

5. All criminal history of Radford Davis.

Response to Item 5: Radford Davis has no criminal history.

6. All paper work and e-mail's from Ashida Kim / Radford Davis to Barron Sheppard
and monie's (sic) paid.

Response to Item 6: There is no "paperwork" between Defendant and Barron Sheppard. While E-mails between Defendant Davis and Defendant Sheppard support Defendant's statement that no contractual or financial ties exist, they also contain Forwards of privileged communication

between Defendant Sheppard and his attorney that cannot be released by Defendant Davis without express written consent of the attorneys of record. Plaintiff cites an e-mail from Defendant Sheppard stating that he bought the rights to the Hands of Death video (which is NOT an infringement of Plaintiff's copyright) with the intention of selling it. But, this statement was not made under oath, since no Claim had been filed at that time, and is factually inaccurate. Defendant Davis GAVE Mr. Sheppard permission to use Hands of Death as he saw fit since it had been discontinued from Dojo Press in 2005. Defendant has received no monies from Barron Sheppard for this consideration.

7. All e-mail's between Floyd Webb and Ashida Kim / Radford Davis / Dojo Press
Response to Item 7: Defendant Davis objects and declines to provide said items. While E-mails between Defendant Davis and Defendant Webb support Defendant's statement that no contractual or financial ties exist, they also contain Forwards of privileged communication between Defendant Webb and his attorney that cannot be released by Defendant Davis without express written consent of the attorneys of record. Defendant Davis has received no monies from Floyd Webb.

8. All mail order receipt's from Ashida Kim .com / Dojo Press for years 2007 to 2001.
Response to Item 8: Defendant Davis objects and declines to provide said mail order receipts to Plaintiff on the grounds that Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such receipts nor their safe return. This is merely Plaintiff's attempt to harass and intrude into Defendant's personal life and expand his complaint without due cause or justification.

9. All parties a joined with Ashida Kim .com and their involvement with said web site.

Response to Item 9: AshidaKim.com is a wholly owned internet domain name of Defendant Davis.

10. State the name and addresses and the occupations of each participating in the preparation of these interrogatives.

Response to Item 10: Defendant Davis prepares this response Pro Se.

11. State the owner of Ashida Kim .com/ Dojo Press.com

Response to Item 11: Radford Davis is the sole owner of AshidaKim.com and DojoPress.com

12. Name all people involved in Ashida Kim .com and the Job's and involvement.

Response to Item 12: There is no one else involved in the "Job." DOJO Press Disclaimer- The information contained in this website is for general information purposes only. This information is provided gratis by "DojoPress.com" We endeavor to keep the information up-to-date and Correct. We make no representations or warranties of any kind, express or implied, about the completeness, accuracy, reliability, suitability or availability of the websites or the information, products, services, or related graphics contained on these websites for any purpose. In no event will "DojoPress.com" be liable for any loss or damage including without limitation, indirect or consequential loss or damage, or any loss or damage whatsoever arising from loss of data or profits arising out of or in connection with the use of this website. Through this website you are able to link to other websites which are not under the control of "DojoPress.com" We have no control over the nature, content or availability of those sites which, may be visited at the readers own discretion and risk. The inclusion of any links does not necessarily imply a

recommendation or endorsement of the views or products expressed within them. Every effort has been made to keep the website current and operating smoothly. However, "DojoPress.com" takes no responsibility for and will not be liable for any website being temporarily unavailable due to technical issues beyond our control.

13. State your involvement in the Search for Count Dante and monies paid.

Response to Item 13: Defendant's involvement with the Search for Count Dante has been limited to a few e-mails and a promise of possibly being interviewed. Defendant Davis has received no monies form Defendant Webb. In 2005 Dojo Press developed a manuscript composed entirely of original internet postings by Floyd Webb detailing as a journal his quest to that time. This work was done gratis. It was rejected by Mr. Webb as unnoteworthy and was never published.

14. All affiliations with Stoffel Van Vuuren and monies paid by Defendant.

Response to Item 14: Defendant's only relationship with Stoffel van Vuuren is as a friend and fellow martial artist. There are no financial or contractual links between Defendant and Mr. Van Vuuren. No monies have been paid to Mr. Van Vuuren by Defendant Davis. If it please this Honorable Court, Mr. Van Vuuren was not named in Plaintiff's original petition and no evidence has been presented to link him to this cause of action in any way. This is a clear example of Plaintiff seeking to enlarge his petition illegally and unlawfully and include individuals outside the purview of this cause of action.

15. All monies between Ashida Kim and Barron Sheppard.

Response to Item 15: No monies have been exchanged between Defendant and Barron Sheppard.

16. All property of Ashida Kim / Radford Davis.

Response to Item 16: Financial Affidavit of Poverty on File. Defendant owns no real property, has no savings, and receives no pension or annuities.

17. All Martial Arts diplomas belonging or issued to Ashida Kim / Radford Davis / Dojo Press.com.

Response to Item 17: Defendant Davis objects and declines to provide said diplomas. Plaintiff's demand for certificates of Defendant's martial art rank is irrelevant, incompetent and immaterial. This is merely an attempt to obtain the names of any friends of Defendant Davis so they can be harassed as well.

18. All involvement with Barron Sheppard and Wendy Sheppard and Skssystem's.

Response to Item 18: Defendant has no contractual or financial ties to Barron Sheppard, Wendy Sheppard, or SKSsystems.

19. All transaction's with bookstore / i.e. [Walden book's]/ Paladin Press Borders Books and outside publication's Amazon. Com

Response to Item 19: Defendant has no contractual or financial relationship to Walden Books, Border's Books, Amazon.com or any other outside publications. Defendant receives semi-annual secondary royalties from Paladin Press.

20. All records of business transaction's from all publishers pertaining to Ashida Kim / Radford Davis / Dojo Pres / Dojo Press.com

Response to Item 20: Defendant Davis objects and declines to provide said records of transactions between Defendant and publishers to Plaintiff since Plaintiff is not a certified

public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such receipts nor their safe return. This is merely Plaintiff's attempt to harass, intrude into Defendant's personal life and expand his complaint without due cause or justification.

21. All outside business transaction's overseas for year's 2001 to 2006.

Response to Item 21: Defendant Davis objects and declines to provide the stipulated items as being vague and incomplete. Further, Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such unspecified items nor their safe return.

22. All business deals with Floyd Webb pertaining to the Search for Count Dante.

Response to Item 22: There have been no "business deals" between Defendant Davis and Floyd Webb.

23. All copies of World's Deadliest Fighting Secrets and Patches pertaining to this action.

Response to Item 23: Dojo Press has no copies of World's Deadliest Fighting Secrets or unidentified "patches" in stock. If it please the Court, no mention of "patches" was made the original complaint. This is yet another example of Plaintiff seeking to expand his complaint unlawfully.

24. Copies of all membership's and Diplomas Pertaining to the Black Dragon Fighting Society and Count Dante/ John Keehan.

Response to Item 24: There are no Black Dragon Fighting Society Memberships.

25. All other martial arts business pertaining to Ashida Kim / Radford Davis.

Response to Item 25: Defendant Davis objects and declines to provide said records of "all other martial arts business pertaining to Ashida Kim/Radford Davis" to Plaintiff on the grounds that Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such receipts nor their safe return. This is merely Plaintiff's attempt to harass, intrude into Defendant's personal life and expand his complaint without due cause or justification.

26. Copies of all membership's and Diplomas Pertaining and Franchises to Black dragon fighting Society franchises.

Response to Item 26: There are no Black Dragon Fighting Society Franchises.

27. Copies of all membership's and Diplomas Pertaining pertaining to Ashida Kim .com

Response to Item 27: There are no diplomas or memberships pertaining to AshidaKim.com

28. Copies of all mail -order receipt's pertaining to Ashida Kim.com and Dojo Press.

Response to Item 28: Duplicate of item 8. Defendant Davis objects and declines to provide said mail order receipts to Ashida Kim/Radford Davis receipts to Plaintiff since Plaintiff is not a certified public accountant and cannot guarantee the accuracy or integrity of any audit or examination. Neither can he guarantee the confidentiality or security of such receipts nor their safe return. This is merely Plaintiff's attempt to harass, intimidate and intrude into Defendant's personal life and expand his complaint without due cause or justification.

29. Copies of All You - Tube and Goggle Videos limited and not limited to this list.

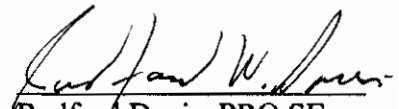
Response to Item 29: Defendant has not posted any videos on YouTube or Google, therefore,

there are no videos to be produced. Nor has Plaintiff provided a "list." Instead he again uses vague terminology to "cast a wide net" in the hope of discovering some new facet to exploit.

30. Proof of ownership and authority and lineage of Grand Mastership and Ownership of Black Dragon Fighting Society. [I e] Diplomas, Certificates, Grades and Rank under Ashida Kim / Radford Davis/ Dojo Press. / Christopher Hunter.

Response to Item 30: Defendant knows full well there are no documents relating to Defendant that show proof of ownership or authority or lineage of Grand Mastership or Ownership of the BDFS. Only a ID Card signed by the first grandmaster, Count Dante, indicating that Defendant is a registered member of the BDFS that has been denied by Plaintiff as being official.

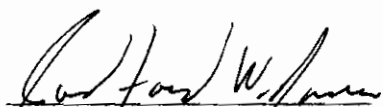
Respectfully submitted,



Radford Davis, PRO SE
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dojopress@gmail.com
29 November 2007

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document was served upon each party appearing pro se and the attorney of record for each other party by mail on November 30, 2007.



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30 November 2007