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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

[REDACTED], individually,

Plaintiff,

vs.

AMERICAN ASSOCIATION OF
ZOOLOGICAL PARKS AND AQUARIUMS
INC. D/B/A ASSOCIATION OF ZOOS &
AQUARIUMS, A MARYLAND
CORPORATION DOING BUSINESS IN
KING COUNTY, WASHINGTON; JAMES J.
BREHENY, CHAIR, A RESIDENT OF THE
STATE OF NEW YORK; PEGGY SLOAN,
VICE CHAIR, A RESIDENT OF THE
STATE OF ILLINOIS; DENNIS KELLY,
PAST CHAIR, A RESIDENT OF THE
STATE OF GEORGIA; ALEJANDRO
GRAJAL, DIRECTOR, A RESIDENT OF
THE STATE OF WASHINGTON;
CHRISTOPHER KUCHAR, DIRECTOR, A
RESIDENT OF THE STATE OF OHIO;
JOHN LEWIS, DIRECTOR, A RESIDENT
OF THE STATE OF CALIFORNIA;
NORBERTO CASTRO, DIRECTOR, A
RESIDENT OF THE STATE OF ARIZONA;
CHRIS GENTILE, DIRECTOR, A
RESIDENT OF THE STATE OF NORTH
CAROLINA; ADRIENNE ROWLAND,
DIRECTOR, A RESIDENT OF THE STATE
OF NEVADA; BRIAN L. DAVIS,
DIRECTOR, A RESIDENT OF THE STATE
OF GEORGIA; ELIZABETH A. WHEALY,

Case No. 21-2-08166-1 SEA

DECLARATION OF BENJAMIN STONE IN
SUPPORT OF DEFENDANT AMERICAN
ASSOCIATION OF ZOOLOGICAL PARKS
AND AQUARIUMS INC. D/B/A
ASSOCIATION OF ZOOS & AQUARIUMS'
MOTION FOR A PROTECTIVE ORDER RE
PLAINTIFF'S FIRST INTERROGATORIES
AND REQUESTS FOR PRODUCTION

1 DIRECTOR, A RESIDENT OF THE STATE
2 OF SOUTH DAKOTA; DANIEL M. ASHE,
3 PRESIDENT AND CHIEF EXECUTIVE
4 OFFICER, A RESIDENT OF THE STATE
5 OF MARYLAND; KRISTEN VEHR,
6 EXECUTIVE DIRECTOR, A RESIDENT OF
7 THE STATE OF MARYLAND; AND
8 RONDA SCHWETZ, A RESIDENT OF THE
9 STATE OF WISCONSIN, INDIVIDUALLY
10 AND THE MARITAL COMMUNITY
11 COMPOSED THEREOF,

12 Defendants.

13 Benjamin Stone declares and states:

14 1. I am an attorney for defendant American Association Of Zoological Parks And
15 Aquariums Inc. D/B/A Association Of Zoos & Aquariums, (“AZA”) in this case. I am over 18,
16 competent to give testimony, and base this declaration on personal knowledge.

17 2. Defendant AZA intends to respond to Plaintiff’s complaint with a motion to
18 dismiss pursuant to CR 12(b)(6) and will file it prior to the deadline to respond to the Complaint,
19 August 28, 2021.

20 3. Attached hereto as Exhibit A is a true and correct copy of an email from my office
21 to Plaintiff’s counsel on August 6, 2021 notifying them of our intention to file a motion to
22 dismiss as requesting discovery responses be postponed until after the Court ruled on the motion.

23 4. Plaintiff’s counsel did not respond to the email.

24 5. Upon receiving no response, my office also attempted to reach counsel by
25 telephone on Monday August 9 but was unable to connect with anyone to discuss the request.

26 6. Out of an abundance of caution and to ensure Plaintiff could not argue any
27 objections were waived, Defendant served its initial objections to the Discovery Requests on the
deadline to do so August 9. These objections noted that AZA would be moving to dismiss the
complaint and that responses would be supplemented following the ruling of the Court.

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7. Attached hereto as Exhibit B is a true and correct copy of Plaintiff's First Set Of Interrogatories And Requests For Production Of Documents To Defendant American Association Of Zoological Parks And Aquariums, Inc D/B/A Association Of Zoos & Aquariums **With Answers And Objections Thereto** which were served on August 9, 2021.

8. Attached hereto as Exhibit C is a true and correct copy of an email from Plaintiff's counsel requesting a conference regarding the discovery responses dated August 9.

9. On August 11, 2021, I had a telephonic conference with counsel for Plaintiff pursuant to CR 26(c) in an effort to resolve our disagreement over whether to postpone substantive responses to the Discovery Responses until after the motion to dismiss was ruled on. We were unable to resolve our disagreement.

I declare under penalty of perjury under the laws of the State of Washington in Seattle, Washington, that the foregoing is true and correct.

Sworn this 11th of August 2021 at Seattle, Washington.

Signed: s/ Benjamin Stone
Benjamin Stone

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DECLARATION OF SERVICE

I hereby declare under penalty of perjury under the laws of the State of Washington that I caused a true and correct copy of the foregoing to be served via the methods below on August 11, 2021 on the following counsel/party of record:

<p><i>Plaintiff's Counsel</i> Marty D. McLean, WSBA #33269 Jacob Berman, (Pro Hac Vice forthcoming) HAGENS BERMAN SOBOL SHAPIRO LLP 1301 Second Avenue, Suite 2000 Seattle, WA 9810 I (206) 623-7292 / (206) 623-0594 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: martym@hbsslaw.com jakeb@hbsslaw.com sharonj@hbsslaw.com</p>
<p><i>Plaintiff's Counsel</i> Elizabeth Hanley, WSBA #38233 SCHROETER GOLDMARK & BENDER 810 Third Avenue, Suite 500 Seattle, WA 98104 (206) 622-8000 / (206) 682-2305 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: hanley@sgb-law.com Preskenis@sgb-law.com</p>
<p><i>Counsel for Defendant Schwetz</i> Suzanne K. Michael, WSBA #14072 Matthew J. Macario, WSBA #26522 FISHER & PHILLIPS LLP 1201 3rd Avenue, Suite 2750 Seattle, WA 98101 (206) 247-7010 / (206) 682-7908 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input checked="" type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: smichael@fisherphillips.com mmacario@fisherphillips.com lxgray@fisherphillips.com lwidmer@fisherphillips.com</p>

Dated August 11, 2021 at Seattle, Washington.

s/Logan Platvoet

Logan Platvoet, Legal Secretary
Logan.Platvoet@lewisbrisbois.com

Exhibit A

Platvoet, Logan

From: Macklin, Sarah
Sent: Friday, August 6, 2021 3:00 PM
To: Sharon Johnson; marty@hbsslaw.com; jakeb@hbsslaw.com; hanley@sgb-law.com; preskenis@sgb-law.com
Cc: Stone, Benjamin; Platvoet, Logan; Lewis, Angela; mmacario@fisherphillips.com; smichael@fisherphillips.com; lwidmer@fisherphillips.com; Foster, Tami; lxgray@fisherphillips.com
Subject: [REDACTED] American Association of Zoological Parks, et al.

Good afternoon,

I see discovery directed at AZA was served along with the Complaint and Summons. We intend to file a motion to dismiss the Complaint on behalf of our clients and request that the discovery responses be delayed until after the Court has had the opportunity to rule on our motion. If you'd like to discuss this request, please do not hesitate to reach out.

Best,
Sarah

Sarah D. Macklin
Attorney
Seattle
206.455.7407 or x2067407

Exhibit B

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IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON
IN AND FOR THE COUNTY OF KING

[REDACTED], individually,

Plaintiff,

vs.

AMERICAN ASSOCIATION OF ZOOLOGICAL PARKS AND AQUARIUMS INC. D/B/A ASSOCIATION OF ZOOS & AQUARIUMS, A MARYLAND CORPORATION DOING BUSINESS IN KING COUNTY, WASHINGTON; JAMES J. BREHENY, CHAIR, A RESIDENT OF THE STATE OF NEW YORK; PEGGY SLOAN, VICE CHAIR, A RESIDENT OF THE STATE OF ILLINOIS; DENNIS KELLY, PAST CHAIR, A RESIDENT OF THE STATE OF GEORGIA; ALEJANDRO GRAJAL, DIRECTOR, A RESIDENT OF THE STATE OF WASHINGTON; CHRISTOPHER KUCHAR, DIRECTOR, A RESIDENT OF THE STATE OF OHIO; JOHN LEWIS, DIRECTOR, A RESIDENT OF THE STATE OF CALIFORNIA; NORBERTO CASTRO, DIRECTOR, A RESIDENT OF THE STATE OF ARIZONA; CHRIS GENTILE, DIRECTOR, A RESIDENT OF THE STATE OF NORTH CAROLINA; ADRIENNE ROWLAND, DIRECTOR, A RESIDENT OF THE STATE OF NEVADA; BRIAN L. DAVIS, DIRECTOR, A RESIDENT OF THE STATE OF GEORGIA; ELIZABETH A. WHEALY,

Case No. 21-2-08166-1 SEA

PLAINTIFF'S FIRST SET OF INTERROGATORIES AND REQUESTS FOR PRODUCTION OF DOCUMENTS TO DEFENDANT AMERICAN ASSOCIATION OF ZOOLOGICAL PARKS AND AQUARIUMS, INC d/b/a ASSOCIATION OF ZOOS & AQUARIUMS WITH ANSWERS AND OBJECTIONS THERETO

1 DIRECTOR, A RESIDENT OF THE STATE
2 OF SOUTH DAKOTA; DANIEL M. ASHE,
3 PRESIDENT AND CHIEF EXECUTIVE
4 OFFICER, A RESIDENT OF THE STATE
5 OF MARYLAND; KRISTEN VEHR,
6 EXECUTIVE DIRECTOR, A RESIDENT OF
7 THE STATE OF MARYLAND; AND
8 RONDA SCHWETZ, A RESIDENT OF THE
9 STATE OF WISCONSIN, INDIVIDUALLY
10 AND THE MARITAL COMMUNITY
11 COMPOSED THEREOF,

12 Defendants.

13 I. INSTRUCTIONS

14 1. These Interrogatories and Requests for Production of Documents are served on you in
15 accordance with Rules 26, 33 and 34 of the Washington Civil Rules.

16 2. You must answer the following interrogatories under oath, and produce documents,
17 electronically stored information, and other tangible things to Hagens Berman Sobol Shapiro
18 LLP within forty days (40) days after these discovery requests are served upon you. Thereafter,
19 you must supplement your responses as required under Civil Rule 26.

20 3. In responding to the Requests for Production, Washington Civil Rules require you to
21 organize and label your production to correspond with the particular discovery request to which
22 the documents are responsive, unless you choose to produce documents as they are kept in the
23 usual course of business (e.g., if you elect to produce an entire electronic file).

24 4. For electronically stored information ("ESI"), please contact our office immediately so
25 that we may discuss an efficient approach to retrieving and producing such information. Emails
26 and other electronically store information should be produced with Optical Character
27 Recognition ("OCR") searchable text. Acceptable formats include searchable Portable Document
Format ("PDF") files, multi-page Tagged Image File Format ("TIFF" or "TIF") with a
companion OCR or extracted text file, and single-page TIFFs with load files for e-discovery
software (i.e., DAT or OPT) that includes metadata fields.

1 5. Files such as spreadsheets and drawing files, or other files that are not easily converted
2 to image format, should be produced in native format

3 6. Finally, if you lodge an objection to one or more of these requests, please indicate to
4 which part of the particular request you object and whether you have in fact withheld documents
5 or information on the basis of your objection, so that Plaintiff may have an opportunity to cure
6 the objection and so that the Court has an opportunity to rule on it.

7 **II. DEFINITIONS**

8 1. "You" or "your" refers to the Defendant American Association of Zoological Parks and
9 Aquariums, Inc. d/b/a Association of Zoos & Aquariums ("AZA") and anyone acting or
10 purporting to act on its behalf, including without limitation, current and former employees,
11 agents, investigators, officers, shareholders, attorneys, and representatives.

12 2. "Document" includes all items contemplated by Civil Rule 34, including information
13 stored in paper form, electronically, or by some other means. Electronically stored information
14 ("ESI") - such as emails, images, drawings, texts, instant messages, Microsoft Word files, Excel
15 spreadsheets, PowerPoint slides, etc. - should be produced in native, .tiff, .pdf, or some other
16 reasonably usable and searchable format with all metadata intact.

17 3. "Identify" when used in relation to a person means to provide the name, last known
18 address, telephone number, job title (if applicable), and relation to Defendant. When used in
19 relation to a company or organization, "identify" means to provide the full name of the entity, the
20 address of company headquarters (if applicable), and the name of a natural person within the
21 organization who has knowledge of the matters inquired about. When used in reference to a
22 document, it means to state the date on which the document was last saved, the author, the
23 number of pages, the title, and the present custodian.

24 **GENERAL OBJECTIONS**

25 These General Objections to Plaintiff's First Set Of Interrogatories And Requests For
26 Production Of Documents To Defendant American Association Of Zoological Parks And
27 Aquariums, Inc d/b/a Association Of Zoos & Aquariums ("Discovery Requests") are

1 incorporated in each response below as if repeated and stated separately in each response. These
2 General Objections form a part of the answer to each Interrogatory and part of the response to
3 each Request for Production and are set forth here to avoid duplication and repetition. Certain of
4 the General Objections may be specifically referenced in answer or response to certain
5 Interrogatories or Requests for Production for purposes of clarity. However, the failure to
6 specifically refer to a General Objection is not a waiver of same, even if other General
7 Objections are specifically referenced in an answer to an Interrogatory or in a response to a
8 Request for Production.

9 1. Defendant's answers and responses to the Interrogatories and Requests for
10 Production are based upon information presently known and documents presently available to it
11 and its counsel. Discovery in this matter is on-going and Defendant reserves the right to amend,
12 supplement, or withdraw any objection, answer, or response to the extent permitted under all
13 relevant Washington Civil Rules, King County Local Rules, and/or any Case Management
14 Scheduling Order.

15 2. Defendant objects to the Interrogatories and Requests for Production, particularly
16 the "Instructions" and "Definitions," to the extent they attempt to impose any obligation beyond
17 or inconsistent with the obligations imposed by the Washington Civil Rules, any Case
18 Management Scheduling Order entered in this case, and/or any applicable local court rule.

19 4. Defendant objects to the Interrogatories and Requests of Production to the extent
20 they seek information protected from disclosure by the attorney-client privilege; work-product
21 doctrine; joint-defense privilege; a confidentiality provision, agreement or order in this or
22 another matter; and/or any other applicable protection. Defendant's responses herein will be
23 limited to non-privileged and otherwise unprotected responsive information.

24 5. Defendant objects to the Interrogatories and Requests for Production to the extent
25 they seek information or documents generated or authored after Defendant was served in the
26 above-captioned lawsuit. These documents and communications are protected by the attorney-
27 client privilege, joint defense privilege, and/or work product doctrine. Producing a privilege log

1 with respect to these documents and communications would itself reveal Defendant's and its
2 attorneys' work product, and is therefore not required under the Civil Rules.

3 6. Defendant objects to the Interrogatories and Requests for Production to the extent
4 they seek information or documents not in the possession, custody, or control of Defendant.

5 7. Defendant objects to the Interrogatories and Requests for Production to the extent
6 they seek information neither relevant to any issue in this litigation nor reasonably calculated to
7 lead to the discovery of admissible evidence.

8 8. Defendant objects to these Interrogatories and Requests for Production to the
9 extent they are overly broad, oppressive, or would require undue burden or expense in order to
10 respond.

11 9. Defendant objects to these Interrogatories and Requests for Production to the
12 extent they seek information that is in the public domain and/or documents to which Plaintiff has
13 equal or greater access.

14 10. Defendant objects to these Interrogatories and Requests for Production to the
15 extent they seek information already in Plaintiff's knowledge, possession, and/or control.

16 11. Defendant objects to these Interrogatories and Requests for Production to the
17 extent they are vague and ambiguous. "Vague" means that the Interrogatory or Request for
18 Production is drafted in such a way that it does not convey with reasonable clarity what is
19 requested of Defendant and, thus, requires Defendant to speculate as to the intended scope and
20 meaning of the Interrogatory or Request for Production. "Ambiguous" as used herein means that
21 the Interrogatory or Request for Production is drafted in such a way as to be capable of more
22 than one reasonable interpretation and thus requires Defendant to speculate at Plaintiff's intended
23 meaning.

24 12. Defendant reserves the right to challenge the competency, relevance, materiality,
25 and admissibility of any documents or information produced or disclosed in answer or response
26 to these Interrogatories or Requests for Production.

1 13. Nothing herein should be construed as an admission by Defendant of the
2 appropriateness, accuracy, admissibility, or relevance of any information, or of the truth or
3 accuracy of any characterization of any matter contained in Plaintiff's Interrogatories and
4 Requests for Production.

5 14. Any document inadvertently produced that contains privileged, confidential,
6 proprietary, or otherwise protected information shall not be deemed a waiver of any applicable
7 privileges or protections.

8 15. In responding to any request, Defendant has made reasonable efforts to respond to the
9 extent that Defendant understands and interprets each request and does not object to the request. If
10 the Defendant subsequently asserts an interpretation of any request that differs from that of Plaintiff,
11 Defendant reserves the right to supplement his Objection

12 16. These Discovery Requests were served with the Complaint which had a summons of
13 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses be
14 postponed until after the Court's ruling (or at least after a response to the Complaint would be due).
15 Accordingly, this Responses and Answers to these Discovery Requests will be supplemented upon
16 the Court's ruling of Defendant's upcoming motion to dismiss.
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1 **III. INTERROGATORIES AND REQUESTS FOR PRODUCTION**

2 **INTERROGATORY NO. 1:** Please identify all persons you believe have knowledge of any
3 facts related to the allegations set forth in Plaintiffs Complaint or in your Answer.

4 **ANSWER:**

5 Objection. These Discovery Requests were served with the Complaint which had a summons of 60
6 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses be
7 postponed until after the Court’s ruling (or at least after a response to the Complaint would be due).
8 Accordingly, this Responses and Answers to these Discovery Requests will be supplemented upon
9 the Court’s ruling of Defendant’s upcoming motion to dismiss. Additionally, this interrogatory
10 seeks to impermissibly accelerate the case schedule.

11 **REQUEST FOR PRODUCTION NO. A:** Please produce all insurance policies that may be
12 used to satisfy all or part of any judgment entered in this action. For each policy, please produce
13 the declarations page, the complete policy, and all addenda, exhibits, endorsements,
14 exclusions.

14 **RESPONSE:**

15 Objection. These Discovery Requests were served with the Complaint which had a summons of 60
16 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses be
17 postponed until after the Court’s ruling (or at least after a response to the Complaint would be due).
18 Accordingly, this Responses and Answers to these Discovery Requests will be supplemented upon
19 the Court’s ruling of Defendant’s upcoming motion to dismiss.

20 **INTERROGATORY NO. 2:** Please describe in detail the process used to select Ronda Schwetz
21 for any leadership position with your organization, including on the Ethics Board.

21 **ANSWER:**

22 Objection. These Discovery Requests were served with the Complaint which had a summons of 60
23 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses be
24 postponed until after the Court’s ruling (or at least after a response to the Complaint would be due).
25 Accordingly, this Responses and Answers to these Discovery Requests will be supplemented upon
26 the Court’s ruling of Defendant’s upcoming motion to dismiss. Additionally, this interrogatory is
27 vague as to “leadership position within your organization.” Additionally, this Interrogatory is overly
broad, unduly burdensome and is not reasonably calculated to lead to any admissible evidence. Any
process used to select Ms. Schwetz for any volunteer position at AZA has no relevance to the
allegations contained in the Complaint which consist of an alleged sexual assault in a private hotel
room after hours and not during any of the conference’s scheduled events. There is simply no nexus

1 between Ms. Schwetz's volunteer role in the organization and the Plaintiff's allegations. Nor could
2 any information about her roles or her selection to these roles impute or create any potential liability
3 for Defendant for the allegations contained in the Complaint.

4 **REQUEST FOR PRODUCTION NO. B:** Please produce all documents related to your answer
5 to the preceding request.

6 **RESPONSE:**

7 See objection to proceeding Interrogatory. Defendant further objects on the grounds that it is
8 overbroad in time because it seeks information to the present, including a period of time after
9 Plaintiff filed his complaint.

10 **INTERROGATORY NO. 3:** Please describe in detail Ronda Schwetz's history with AZA
11 including, but not limited to: all positions she held (e.g., coach, referee, etc.) with AZA or any of
12 its member organizations or chapters; whether any positions were paid; the dates Schwetz held
13 each such position; the names of the roles that she served in with AZA; and the names and last-
14 known contact information for any AZA employees, co-board or committee members, or
15 co-volunteers she worked with.

16 **ANSWER:**

17 Objection. These Discovery Requests were served with the Complaint which had a summons of 60
18 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses be
19 postponed until after the Court's ruling (or at least after a response to the Complaint would be due).
20 Accordingly, this Responses and Answers to these Discovery Requests will be supplemented upon
21 the Court's ruling of Defendant's upcoming motion to dismiss. Additionally, this interrogatory is
22 better directed to codefendant Ms. Schwetz. This Interrogatory is also vague as to "worked with"
23 and misleading as Ms. Schwetz was never employed by Defendant. Finally, this Interrogatory is
24 overly broad, unduly burdensome and is not reasonably calculated to lead to any admissible
25 evidence as it asks for the identity of all members who volunteered with Ms. Schwetz with no
26 limitation to time or relevancy to this lawsuit. Furthermore, the information requested has no
27 relevance to the allegations contained in the Complaint which consist of an alleged sexual assault in
a private hotel room after hours and not during any of the conference's scheduled events. There is
simply no nexus between Ms. Schwetz's volunteer role in the organization and Plaintiff's
allegations. The details of Ms. Schwetz's past volunteer positions with AZA or its member
organization, whether they were paid, the dates she held such positions, and the names of other
members she "worked with" will not lead to any admissible evidence and will not lead to
information that could impute or create any potential liability for Defendant for the allegations
contained in the Complaint. To the extent Plaintiff wants to know about the roles, if any, she had
during the two day conference that occurred in Seattle and at issue in this suit, Defendant will

1 provide that information.

2
3 **REQUEST FOR PRODUCTION NO. C:** Please produce all documents related to your answer
4 to the preceding request.

5 **RESPONSE:**

6 See objection to proceeding Interrogatory.

7
8 **INTERROGATORY NO. 4:** For positions you identified in your answer to Interrogatory No. 3,
9 please describe in detail the reason(s) Ronda Schwetz serves in each role.

10 **ANSWER:**

11 See objection to Interrogatory No. 3. In addition this Interrogatory is vague as written, in
12 particular, Defendant does not understand what Plaintiff means by, “reason(s) Ronda Schwetz
13 serves in each role.” Furthermore, this request is overly broad, unduly burdensome and is not
14 reasonably calculated to lead to any admissible. Furthermore, the information requested has no
15 relevance to the allegations contained in the Complaint which consist of an alleged sexual assault
16 in a private hotel room after hours and not during any of the conference’s scheduled events. The
17 “reason” Ms. Schwetz served on any role, including a paid member of AZA will not lead to any
admissible evidence that will prove or disprove any allegations in this suit. The reasons why Ms.
Schwetz served any particular role and her motivations for volunteering are better responded to
by Ms. Schwetz. Furthermore, why she was suited for any particular volunteer role in AZA does
not provide any information relevant to the claims asserted by Plaintiff.

18 **REQUEST FOR PRODUCTION NO. D:** Please produce all documents related to your answer
19 to the preceding request.

20 **RESPONSE:**

21 See objection to proceeding Interrogatory.

22
23 **INTERROGATORY NO. 5:** Please describe in detail Ronda Schwetz's performance in any
24 positions held within your Association, whether positive or negative. Please include in your
25 answer, a description of any and all awards, commendations, warnings, or complaints related to
26 her.

1 **ANSWER:**

2 Objection. These Discovery Requests were served with the Complaint which had a summons of
3 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
4 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
5 due). Accordingly, this Responses and Answers to these Discovery Requests will be
6 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss.
7 Additionally, this interrogatory is better directed to codefendant Ms. Schwetz. This Interrogatory
8 is overly broad, unduly burdensome and is not reasonably calculated to lead to any admissible
9 evidence given any position she held was a volunteer position. This request is wholly irrelevant to
10 the lawsuit at hand. The information requested has no relevance to the allegations contained in
11 the Complaint which consist of an alleged sexual assault in a private hotel room after hours and
12 not during any of the conference's scheduled events. Whether AZA evaluated Ms. Schwetz's
13 performance as a volunteer at AZA does not help prove or disprove any claim Plaintiff assert.
14 Whether she was evaluated does not create any liability for AZA as to the allegations related to
15 Ms. Schwetz. The same is true of any awards, commendations or other feedback.

16 **REQUEST FOR PRODUCTION NO. E:** Please produce all documents related to your answer
17 to the preceding request.

18 **RESPONSE:**

19 See objection to proceeding Interrogatory.

20 **REQUEST FOR PRODUCTION NO. F:** To the extent not produced in response to the
21 preceding requests, please produce all communications that relate or refer to Ronda Schwetz sent
22 or received by you from September 23, 2018 to the present.

23 **RESPONSE:**

24 Objection. These Discovery Requests were served with the Complaint which had a summons of
25 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
26 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
27 due). Accordingly, this Responses and Answers to these Discovery Requests will be
supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss.
Additionally, this Request is overly broad, unduly burdensome and is not reasonably calculated to
lead to any admissible evidence. The Request seeks any and all emails that "relate or refer to
Rhonda Schwetz" without any limitation on subject matter over a three year period. Defendant
further objects on the grounds that it is overbroad in time because it seeks information to the
present, including a period of time after Plaintiff filed his complaint. Furthermore, the
information requested has no relevance to the allegations contained in the Complaint which
consist of an alleged sexual assault in a private hotel room after hours and not during any of the
conference's scheduled events. This amounts to a fishing expedition. All communication

1 relating to or referring to Ms. Schwetz are not relevant to the allegations in the Complaint and
2 improperly assert that AZA was under some obligation or duty to monitor and discuss its
3 members.

4 **REQUEST FOR PRODUCTION NO. G:** Please produce all documents that relate or refer to

5 [REDACTED].

6 **RESPONSE:**

7 Objection. These Discovery Requests were served with the Complaint which had a summons of
8 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
9 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
10 due). Accordingly, this Responses and Answers to these Discovery Requests will be
11 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Additionally,
12 this Request is overly broad, vague unduly burdensome and is not reasonably calculated to lead to
13 any admissible evidence. The request as written seeks any and all documents that relate or refer
14 to [REDACTED] without any limitation whatsoever. Again, this request would not lead to
15 any information or evidence that would prove or disprove Plaintiff's allegations related to the
16 allegations contained in the complaint and specifically Plaintiff's allegations that he was sexually
17 assaulted while staying in a private hotel room after hours and not during any of the conference's
18 scheduled events. This request as it written would require Defendant to search all its records for
19 any mention of [REDACTED] without any semblance that such search would result in any admissible
20 evidence or information that would lead to admissible evidence because AZA.

17 **INTERROGATORY NO. 6:** Please state whether you are or have been a party to any lawsuit
18 involving an allegation of sexual contact by any organization member, volunteer, or attendee at
19 any conference or event, not including the instant matter. In your answer, please state the case
20 name, case number, jurisdiction in which the case is/was filed, and the disposition of the case
21 (e.g., settled, dismissed, etc.).

22 **ANSWER:**

23 Objection. These Discovery Requests were served with the Complaint which had a summons of
24 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
25 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
26 due). Accordingly, this Responses and Answers to these Discovery Requests will be
27 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Additionally,
this Request is overly broad, vague unduly burdensome and is not reasonably calculated to lead to
any admissible evidence as it contains no time or location limitations. This request is nothing
more than a fishing expedition. Furthermore, the information requested has no relevance to the
allegations contained in the Complaint which consist of an alleged sexual assault in a private

1 hotel room after hours and not during any of the conference's scheduled events. Whether
2 Defendant has been party to any lawsuit related to sexual contact by any organization member is
3 information that is not admissible. Furthermore, Defendant is not liable for the private actions of
4 its members. Accordingly, any information related to past allegations would either be
5 inadmissible because it is irrelevant by being factually distinct or because it violates rules of
6 evidence prohibiting such evidence, generally ER 404.

7 **INTERROGATORY NO. 7:** Have you received any complaint (verbal or written) involving a
8 volunteer, organization member, or conference attendee alleged to have engaged in sexual
9 contact with another AZA member, conference attendee, employee or volunteer, not including
10 the instant matter? If yes, for each such complaint, please describe in de tail: the date on which
11 you received the complaint, the nature of the allegation(s), the date of the alleged sexual contact,
12 the persons involved, and what you did in response to the complaint, if anything.

13 **ANSWER:**

14 Objection. These Discovery Requests were served with the Complaint which had a summons of
15 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
16 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
17 due). Accordingly, this Responses and Answers to these Discovery Requests will be
18 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Additionally,
19 this Request is overly broad, vague unduly burdensome and is not reasonably calculated to lead to
20 any admissible evidence as it contains no time or location limitations. This request is nothing
21 more than a fishing expedition. Furthermore, the information requested has no relevance to the
22 allegations contained in the Complaint which consist of an alleged sexual assault in a private
23 hotel room after hours and not during any of the conference's scheduled events. Whether
24 Defendant has received complaints or information about any of its members' sexual contact is
25 not admissible and is irrelevant. Private individuals' sexual contact is not monitored or of
26 concern to AZA. Simply, whether AZA members engage in sexual activity on their own in
27 private homes or rooms and on their own time is not relevant to this suit and is private
information. Furthermore, Defendant is not liable for the private actions of its members.
Accordingly, any information related to AZA's knowledge of past sexual contact between
members would be inadmissible because it is irrelevant.

24 **REQUEST FOR PRODUCTION NO. H:** Please produce all documents related to your
25 answer to the preceding request.

26 **RESPONSE:**

27 See objection to preceding Interrogatory

1 **INTERROGATORY NO. 8:** Please identify all rules (whether termed "guidelines," "protocols,"
2 "procedures," "disciplinary policies," "membership criteria," "by laws," "handbooks," "codes of
3 ethics," "policies," "directives," or something else) that were in effect at any time between
4 January 1, 2017 that applied to board members, organizational members, volunteers or your
5 employees, including but not limited to board or committee or other leadership socializing
6 with other organizational members, physical or sexual contact with others involved in any
7 capacity with your organization.

8 **ANSWER:**

9 Objection. These Discovery Requests were served with the Complaint which had a summons of
10 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
11 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
12 due). Accordingly, these Responses and Answers to these Discovery Requests will be
13 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Further, this
14 request is vague in as to what Plaintiff means by "in effect at any time between January 1,
15 2017...." Plaintiff did not close the timeframe of the request and, to the extent Plaintiff intends to
16 request to the present. Defendant further objects on the grounds that it is overbroad in time
17 because it seeks information to the present, including a period of time after Plaintiff filed his
18 complaint. Further, this information would not lead to any admissible evidence related to the
19 claims in the lawsuit which include an alleged sexual assault in a private hotel room afterhours.

17 **REQUEST FOR PRODUCTION NO. I:** Please produce all documents related to your answer
18 to the preceding request.

19 **RESPONSE:**

20 See objection to preceding Interrogatory..

22 **INTERROGATORY NO. 9:** If you contend that the rules identified in your answer to
23 Interrogatory No. 8 did not apply to [REDACTED] or relate to concerns he raised at any time
24 to AZA regarding Ms. Schwetz, please state the basis for your contention.

25 **ANSWER:**

26 Objection. These Discovery Requests were served with the Complaint which had a summons of
27 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
be postponed until after the Court's ruling (or at least after a response to the Complaint would be

1 due). Accordingly, this Responses and Answers to these Discovery Requests will be
2 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Furthermore,
3 Defendant objects to this interrogatory as it calls for a legal conclusion and to the extent that it
4 seeks a full description of facts upon which defendant intends to rely on to refute liability. A
5 party is not required to put on a dress rehearsal of trial in discovery. See *Weber v. Biddle*, 72
6 Wn.2d 22, 29, 431 P.2d 705 (1969). Defendant further objects that this interrogatory to the extent
7 it invades the attorney client privilege and/or attorney work product doctrine. This request is
8 also vague as to the used of the word "regrading." Defendant further objects on the grounds that
9 it is overbroad in time to the extent it includes the period of time after Plaintiff filed his
10 complaint. Further, this information would not lead to any admissible evidence related to the
11 claims in the lawsuit which include an alleged sexual assault in a private hotel room after hours
12 and not during any of the conference's scheduled events.

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REQUEST FOR PRODUCTION NO. J: Please produce all documents related to your answer
to the preceding request.

RESPONSE:

See objection to preceding Interrogatory.

INTERROGATORY NO. 10: Please describe in detail all investigations you (or your agents)
have conducted regarding Ronda Schwetz. For each investigation, please identify what prompted
your investigation, the date the investigation began, the names of the persons responsible for the
investigation, the names of any witnesses interviewed, the results of the investigation, with
whom the results were shared, and what changes you made (if any) as a result of the
investigation.

ANSWER:

Objection. These Discovery Requests were served with the Complaint which had a summons of
60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
be postponed until after the Court's ruling (or at least after a response to the Complaint would be
due). Accordingly, this Responses and Answers to these Discovery Requests will be
supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss.
Furthermore, Defendant objects to this request as being overly broad, unduly burdensome and is not
reasonably calculated to lead to any admissible evidence. In addition, Defendant objects to this
disclosure of information related to any investigations it has taken since Plaintiff retained attorneys
and sent a demand because such information is protected from disclosure by the work-product
doctrine and, potentially, the attorney client privilege. The request is also vague as to

1 “investigations” as it does not limit the term in anyway. This request implies that Defendant has
2 any obligation to investigate its members. This information would not lead to any admissible
3 evidence related to the claims in the lawsuit which include an alleged sexual assault in a private
4 hotel room after hours and not during any of the conference’s scheduled events. Past
5 investigations would again be inadmissible.

6 **REQUEST FOR PRODUCTION NO. K:** Please produce all documents related to your
7 answer to the preceding request.

8 **RESPONSE:**

9 See objection to preceding Interrogatory.

10 **REQUEST FOR PRODUCTION NO. L:** Please produce the bylaws in effect for your
11 Association during the years 2017 through present.

12 **RESPONSE:**

13 Objection. These Discovery Requests were served with the Complaint which had a summons of
14 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
15 be postponed until after the Court’s ruling (or at least after a response to the Complaint would be
16 due). Accordingly, this Responses and Answers to these Discovery Requests will be
17 supplemented upon the Court’s ruling of Defendant’s upcoming motion to dismiss. Defendant
18 further objects on the grounds that it is overbroad in time because it seeks information to the
19 present, including a period of time after Plaintiff filed his complaint. This request implies that
20 Defendant has any obligation to investigate its members. This information would not lead to any
21 admissible evidence related to the claims in the lawsuit which include an alleged sexual assault
22 in a private hotel room after hours and not during any of the conference’s scheduled events.
23 Bylaws in this instance would not create any liability or duty of Defendant related to the
24 allegations in this lawsuit.

25 **REQUEST FOR PRODUCTION NO. M:** Please produce all communications between you
26 and any persons who inquired about [REDACTED] including other members, prospective
27 employers, member organizations or others at any time between January 1, 2018 and
the present.

RESPONSE:

Objection. These Discovery Requests were served with the Complaint which had a summons of
60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
be postponed until after the Court’s ruling (or at least after a response to the Complaint would be
due). Accordingly, this Responses and Answers to these Discovery Requests will be

1 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Defendant
2 further objects to the extent this request invades the attorney client privilege and/or attorney
3 work product doctrine. Defendant further objects on the grounds that it is overbroad in time
4 because it seeks information to the present, including a period of time after Plaintiff filed his
5 complaint. This also appears to be a fishing expedition. AZA did not employ [REDACTED] To the
6 extent Defendant provided any feedback to third parties about [REDACTED] it would have been
7 solely within their personal capacity as he did not have any official role, job, or title within AZA
8 other than a paying member and volunteer. Therefore, these communications, to the extent they
9 exist are not relevant and not attributable to Defendant as an entity.

10
11
12 **INTERROGATORY NO. 11:** Please identify each person who has been retained as an expert
13 and describe in detail the following with respect to each:

- 14 a. The subject matter on which the expert may be called to testify;
- 15 b. The substance of the facts and opinions to which the expert is expected to testify;
- 16 c. A summary of the grounds for each opinion; and
- 17 d. All notes and files provided to each expert.

18 **ANSWER:**

19 Objection. These Discovery Requests were served with the Complaint which had a summons of
20 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
21 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
22 due). Accordingly, this Responses and Answers to these Discovery Requests will be
23 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Additionally,
24 this interrogatory seeks to impermissibly accelerate the case schedule.

25
26 **INTERROGATORY NO. 12:** For each expert you intend to call to testify at trial, please
27 identify all cases in which the expert provided testimony in deposition and/or at trial.

ANSWER:

Objection. These Discovery Requests were served with the Complaint which had a summons of
60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
be postponed until after the Court's ruling (or at least after a response to the Complaint would be
due). Accordingly, this Responses and Answers to these Discovery Requests will be
supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Additionally,
this interrogatory seeks to impermissibly accelerate the case schedule.

1 **INTERROGATORY NO. 13:** For the last 18 months, please identify any agreements,
2 contracts, and Memorandum of Understanding, entered into between the Association of Zoos and
3 Aquariums and U.S. Fish and Wildlife Service.

4 **ANSWER:**

5 Objection. These Discovery Requests were served with the Complaint which had a summons of
6 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
7 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
8 due). Accordingly, this Responses and Answers to these Discovery Requests will be
9 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Furthermore,
10 Defendant objects to this request as being overly broad, unduly burdensome and is not reasonably
11 calculated to lead to any admissible evidence as it is not limited in any way in subject matter. This
12 request is no more than a fishing expedition. Defendant further objects on the grounds that it is
13 overbroad in time because it seeks information to the present, including a period of time after
14 Plaintiff filed his complaint. There is absolutely no connection between the allegations in the
15 Complaint and Defendant's communication with U.S. Fish and Wildlife Service. Such
16 communication would not be relevant to the action and would be unduly burdensome to
17 Defendant.

18 **INTERROGATORY NO. 14:** For the last 18 months, please identify any communications
19 between the Association of Zoos and Aquariums and U.S. Fish and Wildlife Service that include:

- 20 a. Dan Ashe, AZA President, Craig Hoover, AZA Executive Vice President, and or
21 Steve Olson, AZA Senior Vice President of Government Affairs; and
22 b. The dates and substance of all such communications.

23 **ANSWER:**

24 Objection. These Discovery Requests were served with the Complaint which had a summons of
25 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
26 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
27 due). Accordingly, this Responses and Answers to these Discovery Requests will be
supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Furthermore,
Defendant objects to this request as being overly broad, unduly burdensome and is not reasonably
calculated to lead to any admissible evidence as it is not limited in any way in subject matter. This
request is no more than a fishing expedition. Defendant further objects on the grounds that it is
overbroad in time because it seeks information to the present, including a period of time after
Plaintiff filed his complaint. There is absolutely no connection between the allegations in the
Complaint and Defendant's communication with U.S. Fish and Wildlife Service. Such
communication would not be relevant to the action and would be unduly burdensome to
Defendant.

1 **REQUEST FOR PRODUCTION NO. N:** Please produce all documents related to your
2 answer to the preceding two interrogatories including, the following:

- 3 a. Agreements;
- 4 b. Memorandums of Understanding (MOU);
- 5 c. Contracts; and
- 6 d. All communications between the Association of Zoos and Aquariums staff and
7 U.S. Fish and Wildlife.

8 **RESPONSE:**

9 Objection. See objections to Interrogatories No. 13 and 14.

10
11 **INTERROGATORY NO. 15:** Please state whether you received notice tha [REDACTED]
12 alleged Ronda Schwetz engaged in inappropriate conduct at an AZA event. For each time you
13 received notice, identify the person who received notice, the source of the information, and any
14 actions you took in response.

15 **ANSWER:**

16 Objection. These Discovery Requests were served with the Complaint which had a summons of
17 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
18 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
19 due). Accordingly, this Responses and Answers to these Discovery Requests will be
20 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Defendant
21 also objects to the extent this request invades the attorney client privilege and/or attorney work
22 product doctrine. Whether Defendant received notice of the allegation does not create liability or
23 any duty in light of Plaintiff's allegations that the alleged assault occurred in a private hotel room
24 after hours and not during any of the conference's scheduled events. This request is not relevant.

25
26 **REQUEST FOR PRODUCTION NO. O:** Please produce all documents referring or relating
27 to your answer to the proceeding interrogatory.

RESPONSE:

See objection to preceding Interrogatory.

1 **INTERROGATORY NO. 16:** Please state whether the AZA ever received notification that
2 Ronda Schwetz had or was engaging in inappropriate and/or inebriated conduct during any of its
3 annual conferences.

4 **ANSWER:**

5 Objection. These Discovery Requests were served with the Complaint which had a summons of
6 60 days. Defendant intends to file a motion to dismiss and, accordingly, asked that the responses
7 be postponed until after the Court's ruling (or at least after a response to the Complaint would be
8 due). Accordingly, this Responses and Answers to these Discovery Requests will be
9 supplemented upon the Court's ruling of Defendant's upcoming motion to dismiss. Whether
10 Defendant received notice of any other allegation does not create liability or any duty in light of
11 Plaintiff's allegations that the alleged assault occurred in a private hotel room after hours and not
12 during any of the conference's scheduled events. This request is not relevant.

13 **REQUEST FOR PRODUCTION NO. P:** Please produce all records referring or relating to
14 the information in the previous interrogatory.

15 **RESPONSE:**

16 See objection to preceding Interrogatory. Defendant also objects to the extent this request
17 invades the attorney client privilege and/or attorney work product doctrine.

18 DATED August 9, 2021.

LEWIS BRISBOIS BISGAARD & SMITH LLP

19
20 By: s/Benjamin J. Stone

Benjamin J Stone, WSBA #33436

Sarah D. Macklin, WSBA #49624

1111 Third Avenue, Suite 2700

Seattle, Washington 98101

(206) 436-2020

Benjamin.Stone@lewisbrisbois.com

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Attorneys for Defendant AMERICAN
ASSOCIATION OF ZOOLOGICAL PARKS
AND AQUARIUMS INC. D/B/A ASSOCIATION
OF ZOOS & AQUARIUMS, ET AL.

1 VERIFICATION

2 I am authorized to answer Plaintiffs Interrogatories and Requests for Production and
3 declare under penalty of perjury under the laws of the State of Washington that the answers are
4 true and correct.

5 DATED at _____, _____ this ___ day of August, 2021.

6 _____
7 Signature

8 Printed Name: _____

9 Title: _____

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1 **DECLARATION OF SERVICE**

2 I hereby declare under penalty of perjury under the laws of the State of Washington that I
3 caused a true and correct copy of the foregoing to be served via the methods below on August 9,
4 2021 on the following counsel/party of record:
5

<p>6 Plaintiff's Counsel Marty D. McLean, WSBA #33269 7 Jacob Berman, (Pro Hac Vice forthcoming) HAGENS BERMAN SOBOL SHAPIRO LLP 8 1301 Second Avenue, Suite 2000 Seattle, WA 9810 I 9 (206) 623-7292 / (206) 623-0594 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: martym@hbsslw.com jakeb@hbsslw.com sharonj@hbsslw.com</p>
<p>10 Plaintiff's Counsel Elizabeth Hanley, WSBA #38233 11 SCHROETER GOLDMARK & BENDER 12 810 Third Avenue, Suite 500 Seattle, WA 98104 13 (206) 622-8000 / (206) 682-2305 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: hanley@sgb-law.com Preskenis@sgb-law.com</p>
<p>14 Counsel for Defendant Schwetz 15 Suzanne K. Michael, WSBA #14072 Matthew J. Macario, WSBA #26522 16 FISHER & PHILLIPS LLP 17 1201 3rd Avenue, Suite 2750 Seattle, WA 98101 18 (206) 247-7010 / (206) 682-7908 Fax</p>	<p><input type="checkbox"/> via U.S. Mail, first class, postage prepaid <input type="checkbox"/> via Legal Messenger Hand Delivery <input type="checkbox"/> via Facsimile <input type="checkbox"/> via King County e-Service <input checked="" type="checkbox"/> via E-mail per Eservice Agreement: smichael@fisherphillips.com mmacario@fisherphillips.com lgray@fisherphillips.com lwidmer@fisherphillips.com</p>

19
20 Dated August 9, 2021 at Seattle, Washington.

21
22 *s/Tami L. Foster*

23 _____
Tami L. Foster, Legal Secretary
Tami.Foster@lewisbrisbois.com
24
25
26
27

Exhibit C

Platvoet, Logan

From: Marty McLean <martym@hbsslaw.com>
Sent: Monday, August 9, 2021 8:00 PM
To: Foster, Tami; jakeb@hbsslaw.com; sharonj@hbsslaw.com; hanley@sgb-law.com; preskenis@sgb-law.com; smichael@fisherphillips.com; mmacario@fisherphillips.com; lwidmer@fisherphillips.com; lxgray@fisherphillips.com
Cc: Stone, Benjamin; Macklin, Sarah; Platvoet, Logan; Lewis, Angela
Subject: [EXT] [REDACTED]. American Association of Zoological Parks, et al.

Caution: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Counsel,

We will convene a discovery conference to discuss the failure of your clients to respond to our client's written discovery. Unless you provide an earlier date and time, we will commence the call at 10:00 a.m. on Wednesday August 11, 2021. A conference line for you to utilize will follow this email.

Thank you,


Marty McLean | **Hagens Berman Sobol Shapiro LLP** | Direct: (206) 268-9359

From: Foster, Tami [mailto:tami.foster@lewisbrisbois.com]
Sent: Monday, August 9, 2021 4:42 PM
To: Marty McLean <MartyM@hbsslaw.com>; Jake Berman <JakeB@hbsslaw.com>; Sharon Johnson <SharonJ@hbsslaw.com>; hanley@sgb-law.com; preskenis@sgb-law.com; smichael@fisherphillips.com; mmacario@fisherphillips.com; lwidmer@fisherphillips.com; lxgray@fisherphillips.com
Cc: benjamin.stone@lewisbrisbois.com; sarah.macklin@lewisbrisbois.com; logan.platvoet@lewisbrisbois.com; angela.lewis@lewisbrisbois.com
Subject: [REDACTED] v. American Association of Zoological Parks, et al.

Good morning,

Attached please find our unverified discovery responses. A hard copy will not follow unless requested.

Sincerely,

 **Tami Foster**
Legal Secretary for Kathleen Nelson, Benjamin Stone & William Simmons
Tami.Foster@LewisBrisbois.com
T: 206.455.7427 F: 206.436.2030

1111 Third Avenue, Suite 2700, Seattle, WA 98101 | LewisBrisbois.com

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