

NORTH CAROLINA
GUILFORD COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
15 CVS 2791

LEONARD COLDWELL,)	
Plaintiff,)	
)	
vs.)	PLAINTIFF'S FIRST SET OF
)	INTERROGATORIES AND FIRST
)	SET OF REQUEST FOR
CONNIE SCHMIDT, TRENT)	PRODUCTION OF DOCUMENTS
TOULOUSE (as an online entity),)	TO DEFENDANT CONNIE
RATIONALWIKI.COM,)	SCHMIDT
SALTYDROID.COM, JASON MICHAEL)	
JONES, WHOIS.COM, INC.,)	
Defendants.)	

Pursuant to Rule 33 of the North Carolina Rules of Civil Procedure, the Plaintiff hereby propounds the following interrogatories to be answered by the defendant Connie Schmidt under oath within thirty-three (33) days from the date of service hereon. Pursuant to Rule 26 of the North Carolina Rules of Civil Procedure, these interrogatories shall be deemed continuing, requiring reasonable supplementation of answers, as information becomes available to the said defendant.

Pursuant to Rule 34 of the North Carolina Rules of Civil Procedure, Plaintiff requests that the defendant Connie Schmidt within 33 days from the date of service hereon, to produce copies of the requested documents on the Plaintiff at the offices of Culbertson & Associates, 315-F Spring Garden Street, Greensboro, NC 27401. Pursuant to Rule 26 of the North Carolina Rules of Civil Procedure, these requests shall be deemed continuing so as to require supplemental responses if additional information is obtained.

DEFINITIONS

1. The term "**document**" is used in its customary broad sense to include all forms of recorded information embraced by Rule 34. By way of illustration only and not by way of limitation, "document" includes the following items, whether printed or reproduced by any process, or written and/or produced by hand, namely: notes, correspondence, communications of any nature, telegrams, memoranda, notebooks of any character, summaries or records of personal conversations, diaries, routing slips or memoranda, reports, publications, invoices, specifications, shipping papers, purchase orders, charts, plans, drawings, photographs, sketches, blueprints, minutes or records of meetings, reports and/or summaries of interviews, reports and/or summaries of investigations, opinions or reports of consultants' forecasts, agreements and contracts including all modifications and/or revisions thereof, reports and/or summaries of negotiations, brochures, pamphlets, advertisements, advertising layouts, circulars, trade letters, press releases, drafts of any documents and revisions of drafts of any documents. It shall include, but not be limited to, all recorded forms of information, including paper writings,

photographs, xerographic reproductions, **and information stored on electronic or magnetic media.** If non-identical copies of a single "document" exists, **each non-identical copy is a separate document.**

2. **"Identify"** when used in a request for identification of a person, means to provide the name, address, telephone number, and employer of the person or persons for whom identification is requested.

3. **"Identify"** when used in reference to a document means to provide the title, author, recipient, subject matter and present custodian of such documents. When non-identical copies (or copies bearing additional notations or information) exist of a document, then each non-identical copy is to be identified as a separate document.

4. **"Identify"** when used in reference to any other oral or written communication or contact means to provide the date of the contact or communication, the parties to the contact or communication, a description of the substance of the communication, the identities of any other persons present when the contact or communication occurred, and to "Identify" all documents memorializing, relating or constituting the communication.

5. **"Identify"** when used in reference to a claim, means to provide a description, the date, the subject matter, any legal or administrative actions relating to the claim, any insurance carriers involved in the claim and the disposition of any claim relating to, including but not limited to, benefits from an insurance policy or civil action in any court, agency, or other organization involved in a proceeding to adjudicate claims.

6. **"Party"** means individual, corporation, limited liability company or any other type of legal entity.

6. **"You"** and **"your"** mean Connie Schmidt and all persons acting on your behalf, including attorneys.

INTERROGATORIES

1. Identify by name, address, telephone number and e-mail address all persons providing information for the purpose of answering these interrogatories.

ANSWER:

2. List all e-mail addresses you have used for any type of electronic correspondence for the past five years, including e-mail addresses which may contain alias names and/or any joint or business- or publication-related e-mail addresses.

ANSWER:

3. For each e-mail address identified in your answer to Interrogatory No. 2 above, state the e-mail service company (i.e., gmail, junos, yahoo, hotmail, etc.), providing the e-mail service for each corresponding e-mail address.

ANSWER:

4. Have you received any financial benefit, direct or indirect, from any third party for any posting posted or anything written concerning or about Leonard Coldwell? If so, state the following:

(a) Identify each such third party; and

(b) For each such third party, state the amount(s) paid and the date(s) on which such amount(s) was paid.

ANSWER:

5. Have you ever written anything about Leonard Coldwell other than on cosmicconnie.blogspot? If so, state on what other media you have written about Leonard Coldwell.

ANSWER:

6. Have you ever caused to be posted (under any name or identifier), directly or indirectly, comments to the website www.saltydroid.info? If so, state the following:

(a) the e-mail address you used to make such comment(s);

(b) State the date(s) and substance of such comment(s).

ANSWER:

7. Identify any and all documents showing communications you have had with Jason Michael Jones from January 1, 2013 to the present, including but not limited to e-mail exchanges, regarding Leonard Coldwell and/or the above-titled action.

ANSWER:

8. Identify any and all documents showing communications you have had with saltydroid.info. from January 1, 2013 to the present, including but not limited to e-mail exchanges, regarding Leonard Coldwell and/or the above-titled action.

ANSWER:

9. State the make and model type of any mobile cellular device you have used within the past 60 days and state the cellular carrier for each such device.

ANSWER:

10. Identify by name, address, telephone number and e-mail address any and all persons providing you advice, information and/or assistance in the preparation and filing of Defendant Connie Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction, Memorandum in Support of Defendant Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction and Affidavit in Support of Defendant Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction (hereafter collectively referred to as "Motion to Dismiss"), all of which you filed on February 27, 2015.

ANSWER:

11. State what information the person(s) you have identified in your answer to Interrogatory No. 10 gave you regarding the information to include in your Affidavit in Support of Defendant Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction.

ANSWER:

12. State what information the person(s) you have identified in your answer to Interrogatory No. 10 gave you regarding the argument to make in your Memorandum in Support of Defendant Schmidt's Motion to Dismiss for Lack of Personal Jurisdiction and cases and other authority to cite in support of your argument.

ANSWER:

13. State what information the person(s) you have identified in your answer to Interrogatory No. 10 gave you regarding the need to attach a Certificate of Service to each of the documents collectively constituting your Motion to Dismiss and as to what to include in each Certificate of Service.

ANSWER:

14. Identify any and all documents showing communications you have had with Craig Malisow or any other person at the *Houston Press* from January 1, 2013 to the present, including but not limited to e-mail exchanges, regarding Leonard Coldwell and/or his attorney and/or the above-titled action.

ANSWER:

REQUEST FOR PRODUCTION OF DOCUMENTS

1. Any and all documents relating to, pertaining to or regarding payments you have received from a third party(ies) for any posting posted or anything written concerning or about Leonard Coldwell.

RESPONSE:

2. Any and all documents relating to, pertaining to or regarding comments you have posted to the website www.saltydroid.info.

RESPONSE:

3. Any and all documents you have identified in your answer to Interrogatory No. 7.

RESPONSE:

4. Any and all documents you have identified in your answer to Interrogatory No. 8.

RESPONSE:

5. Any and all documents memorializing communications you have had with the person(s) you identified in your answer to Interrogatory No. 10 regarding the preparation and filing of the documents collectively referred to as your Motion to Dismiss.

RESPONSE:

6. Any and all documents you have identified in your answer to Interrogatory No. 14.

RESPONSE:

7. If not previously produced, any and all documents upon which you rely in answering the above Interrogatories.

RESPONSE:

This 17 day of March, 2015.


William F. May
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