

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION**

<b>SEXUAL MINORITIES UGANDA,</b>	:	<b>CIVIL ACTION</b>
	:	
<b>Plaintiff,</b>	:	<b>3:12-CV-30051-MAP</b>
	:	
<b>v.</b>	:	<b>JUDGE MICHAEL A. PONSOR</b>
	:	
<b>SCOTT LIVELY, individually and as</b>	:	<b>MAGISTRATE JUDGE</b>
<b>president of Abiding Truth Ministries,</b>	:	<b>KATHERINE A. ROBERTSON</b>
	:	
<b>Defendant.</b>	:	

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**DEFENDANT SCOTT LIVELY’S MOTION TO COMPEL  
PLAINTIFF TO PRODUCE UNREDACTED DOCUMENTS  
AND FOR EXPEDITED CONSIDERATION**

Defendant, Scott Lively (“Lively”), pursuant to Rules 34 and 37, Federal Rules of Civil Procedure, and Local Rules 7.1 and 37.1, moves the Court for an order compelling Plaintiff, Sexual Minorities Uganda (“SMUG”), to produce unredacted documents in response to Lively’s First Set of Requests for Production of Documents. Lively states as follows in support of this motion:

1. On September 1, 2014, Lively served Defendant Scott Lively’s First Set of Requests for Production of Documents to Plaintiff, Sexual Minorities Uganda (the “First Request,” a true and correct copy of which is attached hereto as Exhibit A).

2. On October 8, 2014, SMUG served Plaintiff’s Responses to Defendant Scott Lively’s First Set of Requests for Production of Documents (the “First Responses”).

3. On January 30, 2015, SMUG served Plaintiff’s Supplemental Responses to Defendant Scott Lively’s First Set of Requests for Production (the “Supplemental Responses,” a true and correct copy of which is attached hereto as Exhibit B).

4. Through April 2015, SMUG had produced approximately 25,000 pages of documents in response to Lively's First Request, without organization to correspond to Lively's requests, and without information identifying how the documents were kept in the usual course of business. Moreover, the production contains **thousands of redactions** of information labeled variously as "personal" or "non-responsive," or simply "redacted." True and correct copies of documents from SMUG's production showing typical examples of such redactions are attached hereto as composite Exhibit C.

5. On May 14, 2015, respective counsel for Lively and SMUG conducted a telephone conference to address various discovery issues, including the following deficiencies in SMUG's production: (a) SMUG's pervasive redactions of non-privileged information from otherwise responsive documents, and (b) SMUG's failure to either organize and label the documents to correspond to the categories in Lively's request or produce them as they are kept in the usual course of business, as required by Federal Rule of Civil Procedure 34. The call participants were SMUG counsel Mark Sullivan and Gina Spiegelman, and Lively counsel Horatio Mihet and Roger Gannam.

6. On May 20, 2015, Lively Served Defendant Scott Lively's Second Request for Production of Documents to Plaintiff, Sexual Minorities Uganda (the "Second Request," a true and correct copy of which is attached hereto as Exhibit D). The sole purpose of the Second Request was a good faith effort to seek the substantial amount of information redacted by SMUG as "non-responsive" in its production to date:

For all documents previously produced by SMUG in response to Lively's First Request, from which information was redacted based on SMUG's determination that such information was non-responsive (regardless of whether the redacted portions were specifically labeled "Non-Responsive"), produce unredacted

versions of all such documents showing all information previously redacted as non-responsive . . . .

(Second Req. at 1.)

7. On May 27, 2015, respective counsel for Lively and SMUG conducted another discovery telephone conference, and again discussed SMUG's deficient production:

a. Regarding SMUG's redactions, SMUG's counsel persisted in claiming the propriety of the redactions, and indicated SMUG would object to Lively's Second Request seeking discovery of the redacted information.<sup>1</sup> **SMUG's counsel admitted, however, that certain information redacted as "non-responsive" was, in fact, responsive, but nonetheless could retroactively be fit within a relevance objection previously asserted by SMUG.**

b. Regarding SMUG's failure to either organize and label its documents to correspond to the categories in Lively's request or produce them as they are kept in the usual course of business, SMUG's counsel offered to identify the custodian from whom each produced document was obtained.

Once again, the call participants were SMUG counsel Mark Sullivan and Gina Spiegelman, and Lively counsel Horatio Mihet and Roger Gannam.

8. By e-mail dated May 29, 2015, counsel for SMUG again denied any impropriety in redacting information from responsive documents as "non-responsive" or "personal." SMUG's counsel also formally purported to re-categorize certain "non-responsive" redactions as redactions based on the relevance objection asserted by SMUG in its Supplemental Responses directed to request 4 of Lively's First Request (*see supra*, ¶ 7.a). Attached to the e-mail was a

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<sup>1</sup> SMUG's written response to Lively's Second Request is due to be served on or before June 22, 2015.

table showing the custodian from whom each of the produced documents was obtained. A true and correct copy of the e-mail and attachment is attached hereto as Exhibit E.

9. In a subsequent e-mail exchange, Lively's counsel rejected SMUG's attempt to comply with its Rule 34 obligations by merely identifying the custodians from whom each produced document was obtained, rather than providing all information showing how the produced documents were kept in the usual course of business (or organizing and labelling the documents to correspond to Lively's requests). SMUG's counsel then produced, on June 11, 2015, a new table purporting to show the electronic directory and folder names from which each produced document was obtained. However, SMUG redacted certain directory and folder information from the table, effectively concealing how certain documents were kept in the usual course of business. (A true and correct copy of the new table is attached hereto as Exhibit F.) After Lively's counsel again objected to SMUG's failure to comply with Rule 34, SMUG provided, on June 13, 2015, a document purporting to explain the directory and folder name redactions (a true and correct copy of which is attached hereto as Exhibit G), but did not provide any of the redacted information.

10. As argued in the memorandum of law filed contemporaneously herewith, the deficiencies in SMUG's production to be resolved by the Court are as follows:

a. SMUG's redaction of "personal" information from otherwise responsive documents, to the extent SMUG deems the "personal" information to be confidential, violates this Court's Order Regarding Confidentiality of Certain Discovery Material (the "Confidentiality Order," Dkt. No. 106), which prohibits any party from withholding information on the basis of confidentiality. (Confidentiality Ord. at 8.)

b. SMUG's redaction of "non-responsive" information from otherwise responsive documents (and redaction of "personal" information, to the extent SMUG deems the "personal" information also to be "non-responsive") is an improper use of redaction in violation of Rule 34.

c. SMUG's reimagining of certain of its "non-responsive" redactions as redactions based on a relevance objection does not save the redactions from violating Rule 34, and otherwise fails to justify the redactions because the relevance objection was both meritless and waived as untimely.

d. SMUG's redaction of directory and folder name information is an improper use of redaction in violation of the Confidentiality Order and Rule 34.

11. SMUG's improper redaction of responsive documents and their origins requires action by this Court to preserve Lively's ability to investigate, develop, and present his defenses. Furthermore, beginning June 22, 2015, the parties will begin a nine-day period of depositions, including key SMUG representatives and SMUG's designated Rule 30(b)(6) representative. This Court's expedited consideration of this motion is appropriate given the importance of SMUG's production to Lively's ability to meaningfully prepare for these critical depositions, and the recent conclusion of Lively's diligent efforts to resolve the disputed matters without Court intervention.

WHEREFORE, for good cause shown, Lively respectfully requests that the Court grant expedited consideration of this motion, and order SMUG to:

a. produce unredacted versions of all redacted documents previously produced; and

b. produce complete file directory and folder name information showing how the produced documents were kept in the usual course of business or, alternatively, organize and label all produced documents to correspond to Lively's requests.

**Local Rule 37.1 Certification**

The undersigned counsel for Lively, pursuant to Local Rule 37.1, certifies that the provisions of Local Rule 37.1 have been complied with in both this motion and the accompanying memorandum of law in support.

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was filed electronically with the Court on June 18, 2015. Service will be effectuated by the Court's electronic notification system upon all counsel or parties of record.

s/ Roger K. Gannam  
Roger K. Gannam  
Attorney for Defendant Scott Lively

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION**

<b>SEXUAL MINORITIES UGANDA,</b>	:	<b>CIVIL ACTION</b>
	:	
<b>Plaintiff,</b>	:	<b>3:12-CV-30051-MAP</b>
	:	
v.	:	<b>JUDGE MICHAEL A. PONSOR</b>
	:	
<b>SCOTT LIVELY, individually and as president of Abiding Truth Ministries,</b>	:	<b>MAGISTRATE JUDGE NEIMAN</b>
	:	
<b>Defendant.</b>	:	

**DEFENDANT SCOTT LIVELY’S FIRST SET OF REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO PLAINTIFF, SEXUAL MINORITIES UGANDA**

Pursuant to Fed. R. Civ. P. 26 and 34, and Local Rules 26.5 and 34.1, Defendant Scott Lively requests that Plaintiff Sexual Minorities Uganda respond fully and in writing to the following Document Requests, and produce all documents requested below at the offices of Liberty Counsel, 1053 Maitland Center Commons, Maitland, Florida 32751, within thirty (30) days hereof. The responses and document production should be made pursuant to the following definitions and instructions.

**DEFINITIONS**

Whether capitalized, or in lower case, or in all caps:

- 1) “SMUG,” “Plaintiff,” “you” and “your” mean Plaintiff Sexual Minorities Uganda, together with its affiliates, subsidiaries, members, officers, directors, agents, servants, employees, partners, attorneys, and any other person or entity acting on SMUG’s behalf, or on whose behalf SMUG purports to bring this action.
  
- 2) “Lively” means Defendant Scott Lively.



3) “Lawsuit” means the lawsuit you filed against Lively, styled as *Sexual Minorities Uganda v. Scott Lively*, now pending in the United States District Court, District of Massachusetts, as Case No. 3.12-cv-30051, and includes all claims asserted therein.

4) “Complaint” or “Amended Complaint” means the First Amended Complaint (dkt. 27) filed by you on July 13, 2012 in this Lawsuit.

5) “Persecution” has the same meaning as provided by you in Paragraph 3 of the Complaint.

6) “Act of Persecution” means any act, omission, speech or conduct which you allege constitutes or contributes to Persecution, whether in isolation by itself, or together with other related acts, omissions, speech and conduct.

7) “Anti-Homosexuality Bill” refers to the legislation concerning homosexuality first introduced in the Ugandan Parliament in 2009, eventually signed into law by the President of Uganda on or about February 24, 2014, and subsequently invalidated by a Ugandan court. It includes any and all drafts and versions thereof and proposed amendments thereto. It also includes the enacted (and eventually repealed law), notwithstanding the reference to a “bill.”

8) “Document”:

a) has the same meaning as provided in Local Rule 26.5(c)(2); and,

b) includes, without limitation, any handwritten, typewritten, printed, recorded, electronic or electronically stored information, internet-based messaging (such as social media), or graphic matter however produced or reproduced;

c) includes, without limitation, any letters, notes, contracts, reports, records, lists, memoranda, correspondence, telegrams, telexes, telefaxes, telephone text messages, emails, appointment calendars, diaries, schedules, films, videos, photographs, images, sound recordings, writings, drawings, graphs and charts; and

d) includes, without limitation, signed or unsigned Documents, sent or unsent drafts of Documents, and non-identical copies of the same Document.

9) “Communication” has the same meaning as provided in Local Rule 26.5(c)(1), and includes any transmittal or attempted transmittal of a Document.

10) “Possession,” “custody,” and “control” are used in a comprehensive sense and refer to possession, custody, or control by SMUG and its officers, directors, employees, members, attorneys, accountants, and other agents and advisors for SMUG, and by any entity that SMUG controls or directs, either formally or constructively. A document is deemed to be in your control if you have the right to secure the document or a copy thereof from another Person.

11) “Person” has the same meaning as provided in Local Rule 26.5(c)(6).

12) “Concerning” means in any way, directly or indirectly, referring to, describing, evidencing, constituting, relating to, alluding to, amending, assisting with, cancelling, commenting on, comprising, confirming, considering, contradicting, discussing, endorsing, identifying, incorporating, mentioning, modifying, negating, pertaining to, qualifying, reflecting, regarding, relevant to, representing, revoking, showing, suggesting, supplementing, supporting, terminating, underlying, or otherwise involving the subject matter of the specific request.

13) “Including” means “including but not limited to,” or “including, without limitation.”

14) “And,” “or,” and “and/or” have both conjunctive and disjunctive meanings, and shall be read in the manner that affords the Document Request the broadest scope.

15) “Each,” “any,” and “all” mean “each and every.”

16) Any singular terms shall be deemed to include the plural, and any plural term the singular. All pronouns and variations thereof will be deemed to refer to the feminine, masculine or neuter, singular or plural, as the identity of the person or thing referred to requires.

### **INSTRUCTIONS**

1) Each Document Request covers documents in your possession, custody, or control, which extends to any document in the possession, custody, or control of any of your agents, employees, members, advisors, accountants, and attorneys, and includes documents which are not in your custody but are controlled in whole or in part by you, or those which you have an understanding that you may use, inspect, examine, or copy.

2) Documents shall be produced as they are kept in the usual course of business or must be organized and labeled to correspond to the numbered Request(s) for Production to which they respond.

3) If any document requested was, but is no longer, in your possession, custody, or control, identify the document and state what disposition was made of it and the date or dates upon which such disposition was made, and additionally, produce all documents relating to the disposition of such document.

4) If you object to any Document Request, you must: (i) identify the portion of such request claimed to be objectionable and state the nature and basis of the objection; (ii) identify any documents withheld pursuant to such objection with sufficient particularity and in sufficient detail to permit the court to determine whether the documents fall within the scope of such objection; and (iii) produce documents in response to any portion of such request that is not claimed to be objectionable.

5) If you assert a claim of privilege with respect to any Document Request, or a portion thereof, you must identify the nature of the privilege (including work product) that is being claimed and, if the privilege is governed by state law, indicate the state's privilege rule being invoked. You must also provide the following information in the objection: (i) the type of document, e.g., letter or memorandum; (ii) the general subject matter of the document; (iii) the date of the document; and (iv) the author of the document, the addressees of the document, and any other recipients, and, where not apparent, the relationship of the author, addressees, and recipients to each other.

6) **Electronically Stored Information.** Any document that exists in an electronic format (e.g., email communication, document generated by a word processing program, spreadsheet, etc.) should be produced in electronic format on a CD or DVD, in the native electronic format in which that document was generated. For example, a document generated by Microsoft Word should be produced in .doc or .docx format; and an email generated in Microsoft Outlook should be produced in a .pst Outlook data file. In addition to (and not instead of) the electronic format produced on disk, you may also print and bates label an electronically stored document for production in hard copy.

7) These Document Requests are continuing in nature and require you to timely supplement your responses and document production whenever you later obtain information that renders your previous answers inaccurate or incomplete. *See* Fed. R. Civ. P. 26(e).

8) You must restate each Document Request prior to your written response. *See* Local Rule 34.1(a).

9) For brevity, clarity or convenience, the following Document Requests may omit the "alleged" qualifier when referring to various acts, omissions or events. Do not take this as an

indication that Lively concedes that any of the acts, omissions or events inquired about actually took place, or that they took place in the manner described in the inquiry.

10) Unless otherwise specified in an individual Document Request, the relevant date range for Documents responsive to these requests is January 1, 2002 to the present.

### **DOCUMENT REQUESTS**

1) All organizational and governance Documents of SMUG, and of each member of SMUG, including but not limited to articles of incorporation (or their Ugandan equivalent), bylaws (or their Ugandan equivalent), or government registrations (issued or attempted).

2) All Documents reflecting SMUG's, and each member of SMUG's, organizational structure, identity of leadership (officers, directors, managing agents), and identity of membership.

3) All Documents reflecting SMUG's purpose and objectives, as alleged in paragraphs 1 and 20 of the Amended Complaint.

4) All Documents, including but not limited to meeting minutes, notes or recordings, Concerning any meeting of SMUG, or any meeting of a member of SMUG, where there was any discussion of (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

5) All Documents Concerning your claim in paragraph 3 of the Amended Complaint that Persecution is a crime against humanity that is universally proscribed and clearly defined in international law, including but not limited to all sources of international law on which you base that claim.

6) All sources of international law on which you base your claim that the proscription of Persecution on the basis of sexual orientation or transgender status is universally recognized and clearly defined.

7) All Documents, including but not limited to all sources of international law, which define, identify the elements of, interpret, or apply the proscription against Persecution, either generally or on grounds of sexual orientation or transgender status.

8) All Documents Concerning the Anti-Homosexuality Bill you describe in paragraph 9 of the Amended Complaint, including but not limited to any amendments thereto, the enactment thereof, the judicial invalidation thereof, and any efforts taken by you or your members to modify, defeat, challenge, or invalidate the law.

9) All Documents Concerning any investigation, prosecution, conviction, punishment or other adverse action taken by any Ugandan authority against any Person for violation or alleged violation of the Anti-Homosexuality Bill.

10) All Documents Concerning any effort taken by you or any of your members to deal with or counteract the alleged effects or impact of the Anti-Homosexuality Bill, including but not limited to any assistance you or your members claim to have provided to any Person adversely affected by that Anti-Homosexuality Bill.

11) All Documents Concerning, and all Documents on which you base the facts and claims in, your "From Torment to Tyranny" report (the "Report"), a copy of which is attached hereto as Exhibit A, including but not limited to:

- a) all Documents on which you base your claim that there were 162 instances of persecution perpetrated against Ugandan LGBTI people between December 20, 2013 and May 1, 2014;
- b) all Documents on which you base your claim that, in 2012, 19 cases of persecution were reported, and that, in 2013 only 8 cases of persecution were reported;
- c) all "personal testimony directly reported to and/or identified by SMUG and the National LGBTI Security Team," referred to on page 2 of the Report;
- d) all "direct contact" you claim you had with the alleged victims of persecution, and all "names and verified identities" that were supplied to you, as described on page 2 of the Report;
- e) all Documents Concerning any verification or investigation of the claims of persecution described in the Report;
- f) all witness interviews, case reports and media reports described on page 2 of the Report following the sentence "Reported incidents of persecution have been collected in four ways:";
- g) all Documents from which you obtained the information as to each of the 162 cases of persecution described on pages 11-19 of the Report;
- h) all Documents identifying the alleged victim(s) of each of the 162 acts of persecution described in the Report;
- i) all Documents identifying the alleged perpetrator(s) of each of the 162 acts of persecution described in the Report;
- j) all Documents identifying any witness(es) to each of the 162 acts of persecution described in the Report;

- k) all Documents identifying the details and circumstances of each of the 162 acts of persecution described in the Report, including all Documents based upon which you categorized the alleged persecution into various types on pages 5-9 of the Report;
- l) all police reports, arrest records, eviction notices, eviction proceedings, threats, threatening letters, legal proceedings, hospital or healthcare records, and other Documents identified, referred to, or described in each of the 162 acts of persecution listed on pages 11-19 of the Report;
- m) all Documents containing the “names and sensitive information” which were omitted from the Report, as you describe on page 11 of the Report;
- n) all News Articles described on page 20 of the Report;
- o) all earlier drafts of the Report;
- p) all of your Communications Concerning the Report;
- q) all Documents identifying all funding you received for the Report, including the sources and amounts of all funds.

12) All Documents which you contend show a connection between Lively and the conduct alleged in Paragraph 28 of the Amended Complaint.

13) The newspaper article described in Paragraph 29 of the Amended Complaint.

14) All Documents Concerning, and all Documents on which you base your claims regarding, the July 20, 2005 incident described in Paragraph 30 of the Amended Complaint.

15) All Documents which you contend show a connection between Lively and the July 20, 2005 incident described in Paragraph 30 of the Amended Complaint.

16) The Uganda High Court ruling described in paragraph 34 of the Amended Complaint, and all Documents Concerning said ruling.

17) All Documents Concerning, and all Documents on which you base, your claim in paragraph 43 of the Amended Complaint that “LIVELY has worked extensively with key anti-gay political and religious leaders in Uganda with the overall purpose and objective of depriving LGBTI persons of their fundamental rights, contributing intentionally to the commission of the crime of persecution by a group of persons acting with that common purpose.”

18) All Documents Concerning, and all Documents on which you base, your claim in paragraph 44 of the Amended Complaint that “Defendant LIVELY entered into an unlawful agreement with others to intentionally and severely deprive persons of fundamental rights on the basis of their sexual orientation and gender identity.”

19) All Documents Concerning Lively's March 2002 visit to Uganda, including without limitation all speeches, talks, events, seminars and conferences which you claim he attended, and all theories and strategies which you claim he espoused or promoted.

20) All Documents Concerning Lively's June 2002 visit to Uganda, including without limitation all speeches, talks, events, seminars and conferences which you claim he attended, and all theories and strategies which you claim he espoused or promoted.

21) The Roadkill Radio interview described in paragraph 56 of the Amended Complaint.

22) All Documents Concerning, and all Documents on which you base, your claim in paragraph 67 of the Amended Complaint that "As early as 2006, [Lively] had begun to advocate more forcefully in Uganda ... for the criminalization of advocacy, as necessary for silencing individuals who support the rights of LGBTI individuals."

23) All Documents Concerning, and all Documents on which you base, your claim in paragraph 73 that "In Uganda, Lively combined and expanded upon this theme [homosexual recruitment of children] with repeated references to and descriptions of sexual violence against children."

24) All Documents Concerning, and all Documents on which you base, your claim in paragraph 74 of the Amended Complaint that "there [is] no evidence of a connection between adult homosexuality and child molestation."

25) All "studies" to which you refer in paragraph 74 of the Amended Complaint.

26) All Documents Concerning Lively's 2009 visit to Uganda, including without limitation all speeches, talks, events, seminars and conferences which you claim he attended, and all theories and strategies which you claim he espoused or promoted.

27) All Documents Concerning, and all Documents on which you base your claims regarding, the "2009 Anti-Gay Conference" described in paragraphs 75-82 of the Amended Complaint.

28) All audio and video recordings of the "2009 Anti-Gay Conference" described in paragraphs 75-82 of the Amended Complaint, including all raw footage or recordings of the entire conference, and all edited or unedited works depicting any portion of the conference.

29) All Documents on which you base your claim in paragraph 78 of the Amended Complaint that "At one point during this [2009] trip, [Lively] met with members of Parliament for over four hours."

30) The transcript to which you refer in footnote 30 on page 24 of the Amended Complaint, and the recording(s) from which that transcript was made.

31) All Documents which you contend rebut, contradict or disprove any factual claims made by Lively in *The Pink Swastika*.



32) All Documents which you contend rebut, contradict or disprove any factual claims made by Lively in *Redeeming the Rainbow*.

33) The Roadkill Radio interview described in paragraphs 85-87 and footnotes 33-35 of the Amended Complaint.

34) All Documents Concerning, and all Documents on which you base, your claim in paragraph 91 of the Amended Complaint that, "LIVELY has continued to use violent fear-mongering and take affirmative steps after the Anti-Gay Conference in order to sustain and build support inside Uganda to criminalize advocacy and eliminate fundamental human rights protections for LGBTI individuals."

35) All Documents on which you base your claim that Lively undertook any actionable conduct in the United States, including all Documents that describe the nature, dates and location of such conduct.

36) All Documents which you contend show a connection between Lively and the conduct alleged in Paragraph 98 of the Amended Complaint.

37) All Documents on which you base the claims in paragraph 102 of the Amended Complaint.

38) All Documents Concerning the "urgent follow-up meetings" described in paragraphs 105-107 of the Amended Complaint.

39) All Documents on which you base the claim in paragraph 106 of the Amended Complaint that "In the meetings, LANGA drew in large part from LIVELY'S book, *The Pink Swastika*, as well as LIVELY'S talks at the Conference and emphasized LIVELY'S theory about the violent and fascist tendencies of the 'gay movement' and the danger it poses to children and society."

40) All Documents on which you base the claim in paragraph 107 of the Amended Complaint that "Members of Parliament attended and actively participated at the strategy meetings," and the claim that "Members openly stated that they were deeply alarmed and affected by LIVELY'S interventions and that he made it clear they needed to strengthen their laws along the lines suggested by LIVELY."

41) All Documents Concerning the March 25, 2009 press conference described in paragraph 108 of the Amended Complaint, including but not limited to all video and audio recordings of the conference, all media reports of the conference, and all Documents on which you base your claims about the conference.

42) All Documents on which you base the claims in paragraph 109 of the Amended Complaint.

43) The article or recording described in footnotes 43 and 44 on page 31 of the Amended Complaint.

44) All Documents Concerning the August 21, 2007 rally described in paragraphs 123-125 of the Amended Complaint.

45) The article described in footnote 52 on page 34 of the Amended Complaint.

46) All Documents on which you base the claims in paragraph 126 of the Amended Complaint, including but not limited to all Documents identifying the referenced website.

47) All Documents on which you base the claims in paragraphs 127-128 of the Amended Complaint.

48) All Documents Concerning the February 15, 2010 demonstrations and rally described in paragraph 131 of the Amended Complaint.

49) All Documents on which you base the claims in paragraph 140 of the Amended Complaint.

50) All Documents on which you base the claim in paragraph 143 of the Amended Complaint that “LIVELY met with BUTURO at length when he was in Uganda in March, 2009.”

51) The Janet Mefferd Show interview described in footnote 61 on page 38 of the Amended Complaint.

52) All Documents on which you base the claims in paragraph 144 of the Amended Complaint.

53) All Documents on which you base your claim that James Buturo attended the March 2009 conference described in paragraphs 75-82 of the Amended Complaint.

54) The media articles or reports referenced in paragraph 145 of the Amended Complaint.

55) The article referenced in footnote 63 on page 38 of the Amended Complaint.

56) The Conan Businge article described in footnote 65 on page 39 of the Amended Complaint.

57) The interview described in footnote 66 on page 39 of the Amended Complaint.

58) All Documents on which you base your claim in paragraph 152 of the Amended Complaint that James Buturo’s alleged statements regarding the “promotion of homosexuality” in 2007 were inspired by, or connected to, Scott Lively.

59) The documentary film described in paragraph 151 of the Amended Complaint, and all Documents on which you base your claims about the alleged blocking or censorship of that film.

60) All Documents on which you base the claims in paragraph 158 of the Amended Complaint that “BAHATI attended the 2009 Anti-Gay Conference and met at length with LIVELY, LANGA, SSEMPA, and BUTURO.”

61) All Documents on which you base the claim in paragraph 161 of the Amended Complaint that “LIVELY continued to correspond with BAHATI subsequent to the introduction of the bill to advise on the contents of the legislation.”

62) The source document described in footnote 71 on page 41 of the Amended Complaint, and any other Document from which the alleged Bahati statement in paragraph 163 of the Amended Complaint was excerpted.

63) The source document from which the alleged Bahati statement in paragraph 164 of the Amended Complaint was excerpted.

64) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged June 18, 2012 raid and banning of organizations that support LGBTI rights, described in paragraphs 165-175 of the Amended Complaint.

65) All Documents Concerning any harm or damages you allege to have sustained from the June 18, 2012 raid described in paragraphs 165-175 of the Amended Complaint.

66) All Documents which you contend show that Lively is in any way responsible for the June 18, 2012 raid described in paragraphs 165-175 of the Amended Complaint.

67) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the June 18, 2012 raid described in paragraphs 165-175 of the Amended Complaint.

68) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the June 18, 2012 raid described in paragraphs 165-175 of the Amended Complaint.

69) All Documents Concerning the “skills-building workshop” you allege was raided by Ugandan police on June 18, 2012, including but not limited to all Documents that identify each participant in the workshop, the agenda for the workshop, and all materials, documents and presentations given at the workshop.

70) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged February 14, 2012 raid described in paragraphs 176-185 of the Amended Complaint.

71) All Documents Concerning any harm or damages you allege to have sustained from the February 14, 2012 raid described in paragraphs 176-185 of the Amended Complaint.

72) All Documents which you contend show that Lively is in any way responsible for the February 14, 2012 raid described in paragraphs 176-185 of the Amended Complaint.

73) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the February 14, 2012 raid described in paragraphs 176-185 of the Amended Complaint.

74) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the February 14, 2012 raid described in paragraphs 176-185 of the Amended Complaint.

75) All Documents Concerning the “two-week conference on LGBTI issues” you allege was raided on February 14, 2012, including but not limited to all Documents that identify each participant in the conference, the agenda for the conference, and all materials, documents and presentations given at the conference.

76) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged June 4, 2008 arrest of LGBTI rights activists described in paragraphs 186-193 of the Amended Complaint.

77) All Documents Concerning any harm or damages you allege to have sustained from the alleged June 4, 2008 arrest of LGBTI rights activists described in paragraphs 186-193 of the Amended Complaint.

78) All Documents which you contend show that Lively is in any way responsible for the alleged June 4, 2008 arrest of LGBTI rights activists described in paragraphs 186-193 of the Amended Complaint.

79) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged June 4, 2008 arrest of LGBTI rights activists described in paragraphs 186-193 of the Amended Complaint.

80) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged June 4, 2008 arrest of LGBTI rights activists described in paragraphs 186-193 of the Amended Complaint.

81) All Documents Concerning the “peaceful protest at the 2008 HIV/AIDS Implementers Meeting” described in paragraph 186 of the Amended Complaint, including but not limited to all Documents that identify participants in the protest, the organizers of the protest, and all materials, flyers, and other documents distributed at or in connection with the protest.

82) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged threats to criminalize and shut down health services for LGBTI persons, described in paragraphs 194-198 of the Amended Complaint.

83) All Documents Concerning any harm or damages you allege to have sustained from the alleged threats to criminalize and shut down health services for LGBTI persons, described in paragraphs 194-198 of the Amended Complaint.

84) All Documents which you contend show that Lively is in any way responsible for the alleged threats to criminalize and shut down health services for LGBTI persons, described in paragraphs 194-198 of the Amended Complaint.

85) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged threats to criminalize and shut down health services for LGBTI persons, described in paragraphs 194-198 of the Amended Complaint.

86) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged threats to criminalize and shut down health services for LGBTI persons, described in paragraphs 194-198 of the Amended Complaint.

87) All Documents Concerning the “health clinic for LGBTI people in Kampala” described in paragraph 195 of the Amended Complaint, including but not limited to all Documents that evidence your efforts to open the clinic, all costs and resources you expended in opening the clinic, and the clinic’s location, operation and employees.

88) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged 2007 crack-down on media, advocacy and threats of arrest, described in paragraphs 199-208 of the Amended Complaint.

89) All Documents Concerning any harm or damages you allege to have sustained from the alleged 2007 crack-down on media, advocacy and threats of arrest, described in paragraphs 199-208 of the Amended Complaint.

90) All Documents which you contend show that Lively is in any way responsible for the alleged 2007 crack-down on media, advocacy and threats of arrest, described in paragraphs 199-208 of the Amended Complaint.

91) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged 2007 crack-down on media, advocacy and threats of arrest, described in paragraphs 199-208 of the Amended Complaint.

92) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged 2007 crack-down on media, advocacy and threats of arrest, described in paragraphs 199-208 of the Amended Complaint.

93) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged 2005 raid of Victor Mukasa’s home, described in paragraphs 209-214 of the Amended Complaint.

94) All Documents Concerning any harm or damages you allege to have sustained from the alleged 2005 raid of Victor Mukasa’s home, described in paragraphs 209-214 of the Amended Complaint.

95) All Documents which you contend show that Lively is in any way responsible for the alleged 2005 raid of Victor Mukasa's home, described in paragraphs 209-214 of the Amended Complaint.

96) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged 2005 raid of Victor Mukasa's home, described in paragraphs 209-214 of the Amended Complaint.

97) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged 2005 raid of Victor Mukasa's home, described in paragraphs 209-214 of the Amended Complaint.

98) The article described in paragraph 212 of the Amended Complaint.

99) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged arbitrary interference with privacy, and attacks upon honor and reputation, described in paragraphs 215-225 of the Amended Complaint.

100) All Documents Concerning any harm or damages you allege to have sustained from the alleged arbitrary interference with privacy, and attacks upon honor and reputation, described in paragraphs 215-225 of the Amended Complaint.

101) All Documents which you contend show that Lively is in any way responsible for the alleged arbitrary interference with privacy, and attacks upon honor and reputation, described in paragraphs 215-225 of the Amended Complaint.

102) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged arbitrary interference with privacy, and attacks upon honor and reputation, described in paragraphs 215-225 of the Amended Complaint.

103) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged arbitrary interference with privacy, and attacks upon honor and reputation, described in paragraphs 215-225 of the Amended Complaint.

104) All tabloid publications described in paragraphs 215-225 of the Amended Complaint.

105) All Documents Concerning, and all Documents on which you base your claims regarding, the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

106) All Documents Concerning any harm or damages you allege to have sustained from the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

107) All Documents which you contend show that Lively is in any way responsible for the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

108) All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

109) All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

110) All Documents Concerning any effort by you to investigate the murder of David Kato, including the perpetrator(s) of that murder or the purpose or motive for that murder.

111) All Documents which you contend rebut, contradict or disprove the claim that David Kato was killed by a homosexual who was upset with Kato because Kato refused to pay him for sexual services.

112) All Documents which you contend demonstrate that Scott Lively bears any responsibility for the murder of David Kato.

113) All Documents on which you base your claim that the statements attributed to Scott Lively in paragraphs 54, 59, 72-73 and 81-82 of the Amended Complaint are false. (See SMUG's Response to Lively Interrogatory No. 12).

114) All Documents Concerning, and all Documents sufficient to calculate, the costs and expenses you claim to have incurred in connection with the alleged "diversion of SMUG's resources to protect SMUG from the persecution conspiracy and/or joint criminal enterprise as alleged in the Amended Complaint, including diversion of resources to seek redress and accountability for persecution of Plaintiff's staff members and raids of Plaintiff's meetings and to adopt additional security measures and relocate its operations." (See SMUG's Response to Lively Interrogatory No. 4).

115) All Documents Concerning, and all Documents sufficient to calculate, your alleged "Costs incurred and staff time spent following the arbitrary arrest and detention of staff member(s) and following the harassment and threats faced by staff member(s) causing them to temporarily relocate." (See SMUG's Response to Lively Interrogatory No. 4).

116) All Documents Concerning, and all Documents sufficient to calculate, your alleged "Costs incurred and staff time spent in responses to breach(es) to security of SMUG's operations." (See SMUG's Response to Lively Interrogatory No. 4).

117) All Documents Concerning, and all Documents sufficient to calculate, your alleged "Costs incurred and staff time spent to implement additional security measures due to heightened security risks." (See SMUG's Response to Lively Interrogatory No. 4).

118) All Documents Concerning, and all Documents sufficient to calculate, the costs and expenses you claim to have incurred in connection with the alleged “diversion of SMUG’s resources to counteract the persecution resulting from the conspiracy and/or joint criminal enterprise as alleged in the Amended Complaint, including resources used to conduct public education, political and legal advocacy, and media campaigns and to support SMUG’s member organizations, some of which assist LGBTI persons who are denied access to critical services, forcibly evicted, forced to go into hiding or seek asylum, and/or arbitrarily arrested or detained.” (See SMUG’s Response to Lively Interrogatory No. 4).

119) All Documents Concerning, and all Documents sufficient to calculate, your alleged “Costs incurred and staff time spent for public education, advocacy, and media campaigns to counteract the persecution.” (See SMUG’s Response to Lively Interrogatory No. 4).

120) All Documents Concerning, and all Documents sufficient to calculate, your alleged “Costs incurred and staff time devoted to supporting SMUG’s member organizations.” (See SMUG’s Response to Lively Interrogatory No. 4).

121) All Documents Concerning, and all Documents sufficient to calculate, your alleged “Costs incurred and staff time spent bringing a constitutional challenge to the Anti-Homosexuality Act.” (See SMUG’s Response to Lively Interrogatory No. 4).

122) All Documents Concerning, and all Documents sufficient to calculate, the costs and expenses you claim to have incurred in connection with the alleged “frustration of SMUG’s purpose as a result of harm SMUG suffered to its standing and reputation in the community, attributes which are necessary to conduct its advocacy and education and outreach campaigns, due to the persecution conspiracy and/or joint criminal enterprise that Defendant has propelled and pursued as alleged in the Amended Complaint.” (See SMUG’s Response to Lively Interrogatory No. 4).

123) All Documents Concerning, and all Documents sufficient to calculate, the nature and amount of any other damages for which you seek recovery in this Lawsuit.

124) All Documents Concerning any assistance you provided to any Person “in finding necessary medical care, housing and needed resources,” or any assistance you provided to any Person who has “fled the persecution and [sought] asylum in other countries,” or any assistance you provided to any Person who has “been arbitrarily arrested and harassed and/or mistreated by the police,” as you allege on page 73 of your Opposition to Lively’s Motion to Dismiss (dkt. no. 38).

125) All Documents which you contend demonstrate that Lively undertook any actionable conduct or omission in a capacity other than as President of Abiding Truth Ministries.

126) All Documents Concerning sex tourism and its effects on children under the age of 18 in Uganda.



127) All Communications and Documents exchanged between any combination of any of the following Persons: Frank Mugisha, Pepe Onziema, Richard Lusimbo, Victor Mukasa or David Kato, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

128) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KAPYA KAOMA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

129) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KASHA JACQUELINE NABAGESERA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

130) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HUMAN RIGHTS AWARENESS AND PROMOTION FORUM (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

131) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GEOFFREY OGWARO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

132) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NICHOLAS OPIYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

133) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JANE THIRIKWA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

134) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HUMAN RIGHTS CAMPAIGN (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

135) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and WAGUMA MUZAMIL SSERWADDA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

136) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JOHN STAUFFER or CIVIL RIGHTS DEFENDERS (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

137) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GAETANO KAGGWA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

138) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and YVONNE OYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

139) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GEORGE OUNDO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

140) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SANDRA BAGGOTTE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

141) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JINGO FRANCIS, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

142) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SAMUEL OKIROR, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

143) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ALFRED WASIKE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

144) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AGNES NANDUTU, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

145) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CONAN BUSINGE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

146) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and EAST AND HORN OF AFRICA HUMAN RIGHTS DEFENDERS PROJECT (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

147) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KIM MUKASA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

148) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HOPE CHIGUDU, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

149) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HILDA TADRIA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

150) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and DIANA BAKURAIRA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

151) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AKELLO LUCY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

152) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ST. PAUL RECONCILIATION AND EQUITY CENTRE (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

153) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and VINCENT SEKITOLEKO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

154) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CLARE BYARUGABA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

155) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CIVIL SOCIETY COALITION ON HUMAN RIGHTS AND CONSTITUTIONAL LAW (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

156) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SENFUKA WARRY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

157) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SARAH NDUGGA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

158) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JAY ABANG, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

159) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AMBROSE BARIGYE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

160) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and MOSES KIMBUGWE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

161) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and DENNIS WAMALA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

162) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JEAN (of QUEER YOUTH UGANDA), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

163) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CHANEL (of QUEER YOUTH UGANDA), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

164) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JAY MULUCHA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

165) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and VALENTINE KALENDE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

166) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and USAAM MUKWAYA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

167) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and PAUL SEMUGOMA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

168) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NIKILAS MAWANDA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

169) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and BRIAN NKOOYOYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

170) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CHRISTOPHER SENYONJO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

171) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and LUSWATA BRANT, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

172) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and BOB BWANA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

173) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NAKIMULI MAJO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

174) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NAOME RUZINDANA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.



175) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NTEBI SANDRA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

176) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ICEBREAKERS UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

177) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and YOUTH ON ROCK FOUNDATION (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

178) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and RAINBOW HEALTH FOUNDATION MBARARA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

179) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SPECTRUM INITIATIVE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

180) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and TRANS SUPPORT INITIATIVE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

181) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FREEDOM AND ROAM UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

182) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KAMPUS LIBERTY UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

183) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FEM ALLIANCE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

184) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FORUM FOR MINORITY RIGHTS (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

185) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and MOST AT RISK POPULATION SOCIETY IN UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

186) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SEXUAL HEALTH AND REPRODUCTIVE RIGHTS FOR YOUTH (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

187) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GALA UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

188) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and QUEER YOUTH UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

189) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FRANK & CANDY (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

190) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and UGANDA HEALTH SERVICE PROVIDERS ASSOCIATION (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

191) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JIM BURROWAY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

192) All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and WARREN THROCKMORTON, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

193) All Documents referred to in Section B(1) of your Rule 26(a)(1) Initial Disclosures, dated December 10, 2013, to wit “Electronic and hard copy documents reflecting the composition of Plaintiff’s membership, Plaintiff’s organizational structure, and Plaintiff’s attempts to register as a non-governmental organization under Ugandan law.”

194) All Documents referred to in Section B(2) of your Rule 26(a)(1) Initial Disclosures, dated December 10, 2013, to wit “Electronic and hard copy documents and communications reflecting Plaintiff’s advocacy on behalf of its members and the LGBTI community in Uganda.”

195) All Documents referred to in Section B(3) of your Rule 26(a)(1) Initial Disclosures, dated December 10, 2013, to wit “Electronic and hard copy documents and communications reflecting instances of persecution against Plaintiff, its members, and the LGBTI community in Uganda.”

196) All Documents referred to in Section B(4) of your Rule 26(a)(1) Initial Disclosures, dated December 10, 2013, to wit “Electronic and hard copy documents and communications reflecting resources used for security for Plaintiff and services to Plaintiff’s members and the LGBTI community in Uganda in response to the persecution.”

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Attorneys for Defendant Scott Lively

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail this 1st day of September, 2014, upon:

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/s/ Horatio G. Mihet  
HORATIO G. MIHET  
One of the attorneys for Defendant Scott Lively

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION**

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**SEXUAL MINORITIES UGANDA,**

*Plaintiff,*

v.

**Civil Action No.**

**SCOTT LIVELY, individually and as  
President of Abiding Truth Ministries,**

**3:12-CV-30051**

*Defendant.*

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**PLAINTIFF'S SUPPLEMENTAL RESPONSES TO DEFENDANT SCOTT LIVELY'S  
FIRST SET OF REQUESTS FOR PRODUCTION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Sexual Minorities Uganda ("SMUG") supplements Plaintiff's Responses to Defendant Scott Lively's First Set of Requests for Production of Documents as follows.

In the interest of clarity and for ease of reference, SMUG includes herein only the Responses and Objections to Document Requests that are being supplemented on this date.

Subject to and without waiving the general and specific objections set out in Plaintiff's Responses to Defendant Scott Lively's First Set of Requests for Production of Documents, SMUG further objects and responds as follows:

**RESPONSES AND OBJECTIONS TO DOCUMENT REQUESTS**

Document Request 4:

All Documents, including but not limited to meeting minutes, notes or recordings, Concerning any meeting of SMUG, or any meeting of a member of SMUG, where there was any discussion of (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f)

David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 4:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). In addition, SMUG objects to this request to the extent that it purports to require SMUG to produce documents relating to SMUG's member organizations without regard to whether such documents are within SMUG's possession, custody, or control. SMUG further objects that the term "any meeting of a member of SMUG" is overbroad, ambiguous, and burdensome and seeks information not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG also objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and the attorney work product doctrine. SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad,

ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the murder of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 4:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the Anti-Homosexuality Bill (“AHB”), including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB regardless, of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the bill, but only for its efforts to challenge the



law as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 8:

All Documents Concerning the Anti-Homosexuality Bill you describe in paragraph 9 of the Amended Complaint, including but not limited to any amendments thereto, the enactment thereof, the judicial invalidation thereof, and any efforts taken by you or your members to modify, defeat, challenge, or invalidate the law.

Response to Request No. 8:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents relating to SMUG's member organizations without regard to whether such documents are with SMUG's possession, custody, or control. SMUG further objects to this request to the extent it seeks documents equally or more available to Defendant. SMUG also objects to the request to the extent that it calls for the production of documents protected by the attorney-client privilege and the attorney work product doctrine. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 8:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably

calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 105:

All Documents Concerning, and all Documents on which you base your claims regarding, the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

Response to Request No. 105:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG further objects that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning allegations and "claims regarding" allegations in three paragraphs of the Amended Complaint. SMUG also objects to the extent that the documents are in Defendant's possession or equally or more available to Defendant. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature and protected by the right to privacy under the United States and Ugandan Constitutions; Universal Declaration of

Human Rights (1948) (article 12); International Covenant on Civil and Political Rights (1966) (article 17); Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and Declaration of Principles on Freedom of Expression in Africa (2002) (article 4.3). Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 105:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects that this request, as it relates to paragraph 226 of the Amended Complaint, is overbroad and unduly burdensome. SMUG further objects that this request, as it relates to paragraphs 226-228 of the Amended Complaint, seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, as SMUG previously represented in its response to Defendant's Interrogatory No. 6, SMUG is not seeking compensation for the diversion of its resources for directly assisting individuals. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 106:

All Documents Concerning any harm or damages you allege to have sustained from the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

Response to Request No. 106:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG further objects that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning the allegations in three paragraphs of the Amended Complaint. SMUG also objects to this request to the extent that it calls for privileged attorney

work product. SMUG further objects to this request to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature and protected by the right to privacy under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (article 12); International Covenant on Civil and Political Rights (1966) (article 17); Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and Declaration of Principles on Freedom of Expression in Africa (2002) (article 4.3). Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 106:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects that this request, as it relates to paragraph 226 of the Amended Complaint, is overbroad and unduly burdensome. SMUG further objects that this request, as it relates to paragraphs 226-228 of the Amended Complaint, seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, as SMUG previously represented in its response to Defendant's Interrogatory No. 6, SMUG is not seeking compensation for the diversion of its resources for directly assisting individuals. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 107:

All Documents which you contend show that Lively is in any way responsible for the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

Response to Request No. 107:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG also objects to this request because it presupposes an incorrect legal theory and calls for legal conclusions and extends to issues of pure law outside the scope of discovery permitted by the Federal Rules of Civil Procedure. SMUG further objects to this request to the extent it calls for privileged attorney work product. SMUG further objects that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning the allegations in three paragraphs of the Amended Complaint. SMUG also objects that the documents are in Defendant's possession or equally or more available to Defendant. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 107:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects that this request, as it relates to paragraph 226 of the Amended Complaint, is overbroad and unduly burdensome. SMUG further objects that this request, as it relates to paragraphs 226-228 of the Amended Complaint, seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, as SMUG previously represented in its response to Defendant's Interrogatory No. 6, SMUG is not seeking compensation for the diversion of its resources for directly assisting individuals. Subject to and without waiving the above objections, SMUG states that it will produce

any responsive documents.

Document Request 108:

All Documents which you contend show that Lively undertook any action or omission in the United States to aid or bring about the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

Response to Request No. 108:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG also objects to this request because it presupposes an incorrect legal theory and calls for legal conclusions and extends to issues of pure law outside the scope of discovery permitted by the Federal Rules of Civil Procedure. SMUG further objects to this request to the extent it calls for privileged attorney work product. SMUG further objects that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning the allegations in three paragraphs of the Amended Complaint. SMUG also objects that the documents are in Defendant's possession or equally or more available to Defendant. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 108:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects that this request, as it relates to paragraph 226 of the Amended Complaint, is overbroad and unduly burdensome. SMUG further objects that this request, as it relates to paragraphs 226-228 of the Amended Complaint, seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, as SMUG previously represented in its response to Defendant's Interrogatory No. 6, SMUG is not seeking compensation for the diversion of its resources for directly assisting

individuals. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 109:

All Documents which you contend show that Lively undertook any action or omission outside of the United States to aid or bring about the alleged invidious discrimination described in paragraphs 226-228 of the Amended Complaint.

Response to Request No. 109:

SMUG objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG also objects to this request because it presupposes an incorrect legal theory calls for legal conclusions and extends to issues of pure law outside the scope of discovery permitted by the Federal Rules of Civil Procedure. SMUG further objects to this request to the extent it calls for privileged attorney work product. SMUG further objects that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning the allegations in three paragraphs of the Amended Complaint. SMUG also objects that the documents are in Defendant's possession or equally or more available to Defendant. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Supplemental Response to Request No. 109:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects that this request, as it relates to paragraph 226 of the Amended Complaint, is overbroad and unduly burdensome. SMUG further objects that this request, as it relates to paragraphs 226-228 of the Amended Complaint, seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because, as SMUG previously represented in its response to Defendant's Interrogatory No.

6, SMUG is not seeking compensation for the diversion of its resources for directly assisting individuals. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 127:

All Communications and Documents exchanged between any combination of any of the following Persons: Frank Mugisha, Pepe Onziema, Richard Lusimbo, Victor Mukasa or David Kato, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 127:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the extent that the request seeks information protected by the attorney-client privilege and the attorney work product doctrine.

SMUG further objects to subsections



(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events the alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 127:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 128:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KAPYA KAOMA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 128:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature and protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration on Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (article 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 128:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 129:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KASHA JACQUELINE NABAGESERA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 129:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in

Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since KASHA JACQUELINE NABAGESERA has served as a coplaintiff with members of SMUG’s staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 129:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 130:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HUMAN RIGHTS AWARENESS AND PROMOTION FORUM (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 130:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3).

SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since HUMAN RIGHTS AWARENESS AND PROMOTION FORUM ("HRAPF") has served as a co-plaintiff with members of SMUG's staff in a separate litigation and provided legal representation to SMUG and/or members of its staff in other matters.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 130:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 131:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GEOFFREY OGWARO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c)



any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 131:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since GEOFFREY OGWARO has served as a co-plaintiff with members of SMUG's staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad,

ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 131:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to

the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 132:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NICHOLAS OPIYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 132:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are

within SMUG's possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since NICHOLAS OPIYO has served as counsel on separate litigation brought by members of SMUG's staff.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 132:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the

ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 133:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JANE THIRIKWA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 133:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental

Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this Request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 133:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the

AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 134:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HUMAN RIGHTS CAMPAIGN (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 134:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the

right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.



Supplemental Response to Request No. 134:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 135:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and WAGUMA MUZAMIL SSERWADDA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 135:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International

Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 135:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 136:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JOHN STAUFFER or CIVIL RIGHTS DEFENDERS (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 136:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the

litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 136:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 137:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GAETANO KAGGWA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 137:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad,

ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 137:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to

the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 138:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and YVONNE OYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 138:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are



within SMUG's possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since YVONNE OYO has served as a co-plaintiff with member(s) of SMUG's staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 138:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the

ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 139:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GEORGE OUNDO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 139:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental

Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 139:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the

AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 140:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SANDRA BAGGOTTE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 140:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the

right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 140:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 141:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JINGO FRANCIS, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 141:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International

Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 141:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 142:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SAMUEL OKIROR, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.



Response to Request No. 142:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the

litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events allege (g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents in the Amended Complaint.

Supplemental Response to Request No. 142:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 143:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ALFRED WASIKE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 143:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 143:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 144:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AGNES NANDUTU, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 144:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 144:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 145:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CONAN BUSINGE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 145:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in

Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 145:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal



challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 146:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and EAST AND HORN OF AFRICA HUMAN RIGHTS DEFENDERS PROJECT (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 146:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 146:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 147:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KIM MUKASA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 147:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 147:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 148:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HOPE CHIGUDU, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 148:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 148:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 149:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and HILDA TADRIA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f)

David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 149:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not



define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 149:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 150:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and DIANA BAKURAIRA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 150:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product.

SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since DIANA BAKURAIRA is a member of SMUG's staff.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is not relevant to any party’s claims or defenses are not reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 150:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably

calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 151:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AKELLO LUCY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 151:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for

privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of ersecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 151:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the

ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 152:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ST. PAUL RECONCILIATION AND EQUITY CENTRE (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 152:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental

Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint; (g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 152:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the

AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 153:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and VINCENT SEKITOLEKO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 153:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the



right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since VINCENT SEKITOLEKO is a member of SMUG’s staff.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 153:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 154:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CLARE BYARUGABA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 154:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 154:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 155:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CIVIL SOCIETY COALITION ON HUMAN RIGHTS AND CONSTITUTIONAL LAW (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act

of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 155:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since CIVIL SOCIETY COALITION ON HUMAN RIGHTS AND CONSTITUTIONAL LAW and/or member(s) of its staff has served as a co-plaintiff with members of SMUG's staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 155:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably

calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 156:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SENFUKA WARRY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 156:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (I 989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for

privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 156:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the



ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 157:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SARAH NDUGGA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 157:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental

Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 157:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the

AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 158:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JAY ABANG, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 158:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 158:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 159:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and AMBROSE BARIGYE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 159:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights ( 1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 159:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 160:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and MOSES KIMBUGWE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 160:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of



admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 160:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 161:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and DENNIS WAMALA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit;

(f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 161:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not

define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 161:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 162:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JEAN (of QUEER YOUTH UGANDA), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 162:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 162:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 163:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CHANEL (of QUEER YOUTH UGANDA), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 163:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 163:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 164:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JAY MULUCHA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Sempa, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 164:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in



Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 164:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal

challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 165:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and VALENTINE KALENDE, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 165:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 165:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 166:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and USAAM MUKWAYA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 166:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 166:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 167:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and PAUL SEMUGOMA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 167:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control. SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since PAUL SEMUGOMA has served as a co-plaintiff with members of SMUG's staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the

litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 167:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.



Document Request 168:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NIKILAS MAWANDA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 168:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 168:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 169:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and BRIAN NKOOYOYO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 169:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 169:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 170:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and CHRISTOPHER SENYONJO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 170:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in

Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 170:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal

challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 171:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and LUSWATA BRANT, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 171:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 171:

In addition to the objections contained in SMUG’s response to this request served on



Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 172:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and BOB BWANA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 172:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 172:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 173:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NAKIMULI MAJO, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 173:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning ~my allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 173:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 174:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NAOME RUZINDANA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit;

(f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 174:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not

define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 174:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 175:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and NTEBI SANDRA, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 175:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections



(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 175:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 176:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and ICEBREAKERS UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 176:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 176:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 177:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and YOUTH ON ROCK FOUNDATION (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 177:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in

Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons. Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 177:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal

challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 178:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and RAINBOW HEALTH FOUNDATION MBARARA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 178:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 178:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 179:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SPECTRUM INITIATIVE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 179:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)



(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 179:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 180:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and TRANS SUPPORT INITIATIVE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 180:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of

admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 180:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 181:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FREEDOM AND ROAM UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit;

(f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 181:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG also objects to the request to the extent it seeks documents protected by the attorney-client privilege since FREEDOM AND ROAM UGANDA and/or member(s) of its staff has served as a co-plaintiff with member(s) of SMUG's staff in a separate litigation.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 181:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 182:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and KAMPUS LIBERTY UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 182:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights ( 1948) (articles 20, 23 ); International Covenant on Economic, Social and Cultural Rights ( 1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 182:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents



relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 183:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FEM ALLIANCE UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 183:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11 ), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in

Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 183:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal

challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 184:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FORUM FOR MINORITY RIGHTS (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 184:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 184:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 185:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and MOST AT RISK POPULATION SOCIETY IN UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 185:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the

Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 185:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 186:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and SEXUAL HEALTH AND REPRODUCTIVE RIGHTS FOR YOUTH (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 186:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or

violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of



admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons. Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 186:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 187:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and GALA UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution

or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 187:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not

define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 187:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 188:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and QUEER YOUTH UGANDA (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 188:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 188:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG’s and/or non-parties’ strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its

efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 189:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and FRANK & CANDY (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 189:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it

purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 189:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents

relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 190:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and UGANDA HEALTH SERVICE PROVIDERS ASSOCIATION (including its officers, directors, agents, servants, employees, partners, or attorneys), Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 190:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in



Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 190:

In addition to the objections contained in SMUG’s response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively’s role in that regard, and non-privileged documents relating to the legal

challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 191:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and JIM BURROWAY, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 191:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989) (article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of

Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term “partners” because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG’s possession, custody, or control.

SMUG further objects to subsections

(c) that the terms “any Persecution or alleged Act of Persecution” are overbroad, ambiguous, and unduly burdensome;

(e) the term “this Lawsuit” as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to “this Lawsuit” and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant’s liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party’s claims or defenses in that is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 191:

In addition to the objections contained in SMUG’s response to this request served on

Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Document Request 192:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and WARREN THROCKMORTON, Concerning: (a) Lively; (b) any visit by Lively, or conference attended by Lively, in Uganda; (c) any Persecution or alleged Act of Persecution; (d) the Anti-Homosexuality Bill; (e) this Lawsuit; (f) David Kato's murder; or (g) David Bahati, Martin Ssempe, Stephen Langa, James Buturo, or Simon Lokodo.

Response to Request No. 192:

SMUG objects to the extent that the requested documents will result in the disclosure of the names of individuals who are not party to this action and that such disclosure would chill or violate their rights to freedom of speech and association under the United States and Ugandan Constitutions; Universal Declaration of Human Rights (1948) (articles 20, 23); International Covenant on Economic, Social and Cultural Rights (1966) (article 8); International Covenant on Civil and Political Rights (1966) (articles 21, 22); Convention on the Rights of the Child (1989)

(article 15); and African Charter on Human and Peoples' Rights (1981) (articles 10, 11), and would reveal information about non-parties that is highly personal in nature protected by the right to privacy under the United States and Ugandan Constitutions; the Universal Declaration of Human Rights (1948) (article 12); the International Covenant on Civil and Political Rights (1966) (article 17); the Convention for the Protection of Human Rights and Fundamental Freedoms (1950) (article 8); and the Declaration of Principles on Freedom of Expression in Africa (2002) (Art. 4.3). SMUG further objects to the term "partners" because it is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG further objects to this request to the extent that it purports to require SMUG to produce documents without regard to whether such documents are within SMUG's possession, custody, or control.

SMUG further objects to subsections

(c) that the terms "any Persecution or alleged Act of Persecution" are overbroad, ambiguous, and unduly burdensome;

(e) the term "this Lawsuit" as used in this subsection is ambiguous because it does not define the scope of documents it seeks related to "this Lawsuit" and overbroad and unduly burdensome to the extent that it seeks documents concerning any allegation at issue in the litigation;

(f) the request is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint;

(g) the request is overbroad and not limited to any party's claims or defenses in that it is without subject matter limitation other than the mention of the individual listed persons.

Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Supplemental Response to Request No. 192:

In addition to the objections contained in SMUG's response to this request served on Defendant on October 8, 2014, as set forth above, SMUG objects to this request to the extent that it seeks documents beyond those that discuss underlying facts concerning the passage of the AHB, including Lively's role in that regard, and non-privileged documents relating to the legal challenge to the AHB. To the extent that this request seeks documents containing any passing mention of the AHB, regardless of the primary subject of the document, SMUG objects on the ground that it is overbroad and unduly burdensome. To the extent this request seeks documents relating to SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law, SMUG objects on the ground that it seeks documents that are not relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking damages for its efforts to prevent the passage of the AHB, but only for its efforts to mount a legal challenge to the AHB as enacted. Subject to and without waiving the above objections, SMUG states that it will produce any responsive documents.

Dated: January 30, 2015

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**DOCUMENT FILED UNDER SEAL**

**PURSUANT TO**

**ORDER REGARDING CONFIDENTIALITY OF CERTAIN DISCOVERY MATERIAL**

**(Dkt. No. 106)**

**EXHIBIT C**



**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
SPRINGFIELD DIVISION**

<b>SEXUAL MINORITIES UGANDA,</b>	:	<b>CIVIL ACTION</b>
	:	
<b>Plaintiff,</b>	:	<b>3:12-CV-30051-MAP</b>
	:	
<b>v.</b>	:	<b>JUDGE MICHAEL A. PONSOR</b>
	:	
<b>SCOTT LIVELY, individually and as president of Abiding Truth Ministries,</b>	:	
	:	
<b>Defendant.</b>	:	

**DEFENDANT SCOTT LIVELY’S SECOND REQUEST FOR  
PRODUCTION OF DOCUMENTS TO PLAINTIFF, SEXUAL MINORITIES UGANDA**

Pursuant to Fed. R. Civ. P. 26 and 34, and Local Rules 26.5 and 34.1, Defendant Scott Lively requests that Plaintiff Sexual Minorities Uganda respond fully and in writing to the following Document Request, and produce all documents requested below at the offices of Liberty Counsel, 1053 Maitland Center Commons, Maitland, Florida 32751, within thirty (30) days hereof. The response and document production should be made pursuant to the Definitions and Instructions contained in DEFENDANT SCOTT LIVELY’S FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO PLAINTIFF, SEXUAL MINORITIES UGANDA (“Lively’s First Request”), which Definitions and Instructions are expressly incorporated herein by this reference.

**DOCUMENT REQUEST**

197) For all documents previously produced by SMUG in response to Lively’s First Request, from which information was redacted based on SMUG’s determination that such information was non-responsive (regardless of whether the redacted portions were specifically labeled “Non-Responsive”), produce unredacted versions of all such documents showing all information previously redacted as non-responsive, using Bates numbers which correspond to the Bates numbers of the previously produced, redacted documents.

For example: SMUG produced a document in response to Lively's First Request, Bates numbered SMUG009668-SMUG009678, showing several redacted portions variously labeled "Personal Data" and "01 Non-Responsive." In response to this request, produce a version of the document showing all information previously redacted as "01 Non-Responsive," bearing corresponding Bates numbers, such as "SMUG009668A-SMUG009678A."

Philip D. Moran  
(MA Bar # 353920)  
265 Essex Street, Suite 202  
Salem, Massachusetts 01970  
Tel: (978) 745-6085  
Fax: (978) 741-2572  
Email: philipmoranesq@aol.com

/s/ Horatio G. Mihet  
Mathew D. Staver  
Admitted Pro Hac Vice  
Horatio G. Mihet  
Admitted Pro Hac Vice  
Roger K. Gannam  
Admitted Pro Hac Vice  
LIBERTY COUNSEL  
P.O. Box 540774  
Orlando, FL 32854-0774  
800-671-1776 Telephone  
407-875-0770 Facsimile  
court@lc.org

Attorneys for Defendant Scott Lively

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail this 20th day of May, 2015, upon:

Pamela C. Spees  
Jeena D. Shah  
Center for Constitutional Rights  
666 Broadway, 7th Fl.  
New York, NY 10012  
pspees@ccrjustice.org  
jshah@ccrjustice.org

Luke Ryan  
100 Main Street, Third Floor  
Northampton, MA 01060  
lryan@strhlaw.com

Gina S. Spiegelman  
Mark Sullivan  
Kaleb McNeely  
Daniel Beebe  
Joshua Colangelo-Bryan  
Dorsey & Whitney LLP  
51 West 52nd Street  
New York, NY 10019-6119  
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mcneely.kaleb@dorsey.com

Counsel for Plaintiff Sexual Minorities Uganda

/s/ Horatio G. Mihet  
HORATIO G. MIHET  
One of the attorneys for Defendant Scott Lively

**From:** [spiegelman.gina@dorsey.com](mailto:spiegelman.gina@dorsey.com)  
**To:** [Mihet, Horatio](#)  
**Cc:** [Gannam, Roger](#); [Sullivan.Mark@dorsey.com](mailto:Sullivan.Mark@dorsey.com)  
**Subject:** RE: SMUG v. Lively: document production issues  
**Date:** Friday, May 29, 2015 11:33:30 AM  
**Attachments:** [All produced docs with custodians.pdf](#)

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Harry,

Thank you again for accommodating a call this week. The following reiterates what was discussed and in certain cases adds additional information for your review:

- 1) In regard to your collections and review methodology for your productions, you declined to respond to our questions about how your process was done and who was involved, including specifically whether Mr. Lively collected documents and conducted searches himself.
- 2) In regard to Requests for Production Nos. 17 and 21, seeking all of Defendant's communications concerning the Anti-Homosexuality Bill, you have confirmed that Lively has produced all non-privileged documents in his custody, possession or control referencing the AHB. Please confirm that you have also searched and produced responsive documents containing the following key words or combinations, or if you have not, please either proceed to conduct such a search, or inform us of your unwillingness to do so:
  - "Anti-Homosexuality Bill"
  - "Anti Homosexuality Bill"
  - Uganda AND bill
  - Uganda AND legislation
  - Uganda AND law
  - Bill OR law OR legislation (for documents dated March-October 2009, and December 2013)
- 3) In regard to Request for Production No. 39, you have confirmed that Lively has produced all non-privileged documents in his custody, possession or control referencing SMUG. Please confirm that you have also searched and produced responsive documents containing the following key words or combinations, or if you have not, please either proceed to conduct such a search, or inform us

of your unwillingness to do so:

- “Sexual Minorities Uganda”
  - EHAHRDP
  - “East and Horn”
  - “Human Rights Defenders”
  - FARUG
  - “Freedom and Roam”
  - Mugisha
  - Mukasa
  - Kasha
  - Nabagasera
  - Pepe
  - Onziema
  - Kalende
  - Gaetano
  - Kaggwa
  - Kato
  - Yvonne
  - Oyo
  - Hilda
  - Tadria
  - Lusimbo
  - Kapyia
  - Kaoma
- 4) In regard to your request for further identifying information concerning the documents in our production, I attach here custodial information as described on the call. You agreed to consider it in good faith with the hope that it resolves your concern. Please also confirm that Lively is the custodian of each and every document you produced or advise us otherwise.
- 5) In regard to redactions in our productions:
- We maintain that our personal data redactions were proper and confirm that none of the names and corresponding phone numbers pertain to witnesses to any of the acts alleged in the Complaint.
  - Our non-responsive redactions fall into two categories, as discussed on the call.
    - o In regard to those portions of documents that contain

information that is not responsive to any of your requests, we maintain that we have properly redacted such information.

- o In regard to the documents that contain information relating to internal strategy discussions about the AHB, your point is well taken that this information is not non-responsive and more properly treated as a relevance objection as was previously asserted in SMUG's Supplemental Responses to Defendant's First Set of Requests for Production. Therefore, please note that all redactions bearing the label "03 Non-responsive" cover SMUG's and/or non-parties' strategies to prevent the passage of the AHB into law pursuant to Plaintiff's relevance objection as set out in its Supplemental Response to Defendant's Request for Production No. 4. We hope that this alleviates your concern or at least clarifies the two universes of documents so that, at minimum, we can continue to discuss resolving the issue of the information that was redacted.

- 6) Victor Mukasa is not affiliated with SMUG. Service on Victor Mukasa will be accepted by:

Arunabha Bhoumik  
**Manatt, Phelps & Phillips, LLP**  
7 Times Square  
New York, NY 10036  
**D (212) 790-4552 F (212) 536-1896**

- 7) With respect to Sam Ganafa, we are checking on his availability for the noticed date of his deposition and we will advise you promptly if we decide to seek a protective order to preclude his deposition.
- 8) SMUG's representative for the 30(b)(6) deposition will be Pepe Onziema.

Regards,  
Gina

---

**From:** Mihet, Horatio [hmihet@liberty.edu]  
**Sent:** Wednesday, May 20, 2015 3:25 PM  
**To:** Spiegelman, Gina; Sullivan, Mark  
**Cc:** Gannam, Roger  
**Subject:** RE: SMUG v. Lively: document production issues

Gina – we are available this Friday morning. How about 10 am?

We also need to further discuss SMUG’s redactions based on alleged “non-responsive” grounds. We do not believe it is proper for SMUG to make such redactions within documents which themselves are responsive. While we reserve the right to challenge SMUG’s redactions and production to Lively’s First Request, we are hoping to avoid troubling the Court with a motion, if possible. This is why we served this afternoon the additional document request, which specifically seeks the redacted material. The redacted material is now certainly “responsive” to Lively’s requests.

Please let us know when we talk on Friday whether this will resolve the issue, and whether SMUG will voluntarily produce the redacted information. If SMUG is going to object to this latest request and still not produce the information, we might as well seek the Court’s assistance now, based upon the initial requests.

Thank you.

**Horatio G. Mihet, Esq.**  
*Vice President of Legal Affairs &  
Chief Litigation Counsel*  
**Liberty Counsel**  
800-671-1776 phone  
407-875-0770 fax  
[www.LC.org](http://www.LC.org) • [hmihet@LC.org](mailto:hmihet@LC.org)

---

**From:** spiegelman.gina@dorsey.com [mailto:spiegelman.gina@dorsey.com]  
**Sent:** Wednesday, May 20, 2015 12:40 PM  
**To:** Mihet, Horatio; Sullivan.Mark@dorsey.com  
**Cc:** Gannam, Roger  
**Subject:** RE: SMUG v. Lively: document production issues

Harry,

After conferring with my colleagues, I believe a brief follow-up call on these topics would be very helpful. Please advise of your availability for the rest of the week.

Best,  
Gina

---

**From:** Mihet, Horatio [<mailto:hmihet@liberty.edu>]  
**Sent:** Wednesday, May 20, 2015 9:49 AM  
**To:** Spiegelman, Gina; Sullivan, Mark  
**Cc:** Gannam, Roger

**Subject:** SMUG v. Lively: document production issues

Gina and Mark – further to our discovery conference last Thursday:

- 1) I can confirm that Lively has produced all non-privileged documents in his custody, possession or control referencing the AHB or SMUG.
- 2) In our discussion, you asked that we provide you with the specific reference in the Protective Order prohibiting the withholding of information on grounds of confidentiality. Please see section 11.(a) (“However, no party may withhold materials or decline to answer questions based solely on a claim that the material sought is Confidential Discovery Material.”) We remain in our belief that SMUG’s redactions on grounds of confidentiality and/or privacy are improper given SMUG’s ability to designate the relevant pages as Confidential. Please let us know ASAP if SMUG will voluntarily produce the redacted information.
- 3) We also discussed SMUG’s failure to identify which documents from its production correspond to which request. We understood you to confirm that SMUG does not have a file cabinet with 24,000 pages lumped together, with no dividers, identifying information, index, etc. As such, SMUG has clearly not produced the documents as they are kept in the regular course of business, and SMUG has an obligation to provide the requested identification/categorization. We discussed in our call how SMUG’s failure to do this has stymied our efforts to review the documents, to determine the extent of SMUG’s compliance with the document request, and to determine the extent of SMUG’s communications with the many potential witnesses it has identified in discovery (and the potential knowledge of those witnesses). Please let us know ASAP if SMUG will voluntarily provide the requested identification/categorization.

Kind regards,

**Horatio G. Mihet, Esq.\***  
*Vice President of Legal Affairs &  
Chief Litigation Counsel*

**Liberty Counsel**

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<b>Bates No</b>	<b>Custodian</b>
SMUG000001	SMUG
SMUG000004	SMUG
SMUG000008	SMUG
SMUG000030	SMUG
SMUG000054	SMUG
SMUG000055	SMUG
SMUG000100	SMUG
SMUG000240	SMUG
SMUG000477	SMUG
SMUG000511	SMUG
SMUG000541	SMUG
SMUG000563	SMUG
SMUG000583	SMUG
SMUG000609	SMUG
SMUG000633	SMUG
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SMUG000675	SMUG
SMUG000697	SMUG
SMUG000731	SMUG
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SMUG002017	Onziema_Pepe
SMUG002020	Onziema_Pepe
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SMUG002209	Onziema_Pepe
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SMUG024891	SMUG
SMUG024899	SMUG
SMUG024921	SMUG
SMUG024933	Mugisha_Frank
SMUG024934	Mugisha_Frank



**DOCUMENT FILED UNDER SEAL**

**PURSUANT TO**

**ORDER REGARDING CONFIDENTIALITY OF CERTAIN DISCOVERY MATERIAL**

**(Dkt. No. 106)**

**EXHIBIT F**

The redactions contained in the source information for the following documents are of names of donor entities, protected by the associational privilege and are not relevant to any claims or defenses in this action:

SMUG001495  
SMUG001619  
SMUG001622  
SMUG001662  
SMUG002969  
SMUG002970  
SMUG002972  
SMUG004259  
SMUG004703  
SMUG004723  
SMUG004729  
SMUG004758  
SMUG005833  
SMUG007417  
SMUG011104  
SMUG011117  
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SMUG012774  
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SMUG012788  
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SMUG015637  
SMUG015644  
SMUG015646  
SMUG015648  
SMUG015652  
SMUG015656  
SMUG015658  
SMUG017283  
SMUG019421  
SMUG020088

The redactions contained in the source information for the following documents are of an individual's name protected by the associational privilege and not a witness to any events in this action. However, understanding that it may be difficult for the Defendant to understand these documents, Plaintiff provides the following information:

These documents in these folders are related to the *Victor Mukasa and Yvonne Oyo v. Attorney General* litigation in the High Court of Uganda referenced in paras. 34, 99, and 102 of the Amended Complaint (dkt. 27) or SMUG's 2007 "Let Us Live In Peace Campaign" referenced in paras. 122 and 199 of the Amended Complaint, in addition to a few news articles and TV footage concerning co-conspirators named in the complaint and/or the LGBTI community in Uganda:

SMUG001842  
SMUG001843  
SMUG001844  
SMUG001845  
SMUG001846  
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SMUG011195  
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SMUG011211  
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SMUG011213  
SMUG011214  
SMUG020143  
SMUG020144  
SMUG020145  
SMUG020146

The redactions contained in the source information for the following documents are of a name of a project of SMUG's that is not relevant to any claims or defenses in this litigation or SMUG's calculation of damages. Certain documents from this folder were produced merely because they contained information independent of this project but responsive to one of Defendant's requests for production:

SMUG015173  
SMUG017209

The redactions contained in the source information for the following documents reflect an internal organizational process not relevant to any claims or defenses in this litigation or SMUG's calculation of damages. Certain documents from this folder were produced merely because they contained information responsive to one or more of Defendant's requests for production; the responsive information, however, was not specific to this organizational process:

SMUG012698  
SMUG012720  
SMUG012722

The source information for the following documents were inadvertently redacted:

<b>Bates No</b>	<b>Custodian</b>	<b>Source</b>
SMUG015761	Onziema_Pepe	/20141114_Onziema_Pepe/Backup - Onziema_Pepe_External.bkf/F:/to be sorted/PDU Evaluation on SMUG Security.pdf
SMUG002320	Lusimbo_Richard	Z:\20141204\Lusimbo_Richard\Document\Chris Folder\
SMUG019426	Lusimbo_Richard	Z:\20141204\Lusimbo_Richard\Document\Chris Folder\