

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS
SPRINGFIELD DIVISION

SEXUAL MINORITIES UGANDA,

Plaintiff,

CIVIL ACTION

v.

NO. 3:12-CV-30051-MAP

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

Defendant.

**DECLARATION OF PAMELA C. SPEES IN SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANT'S MOTION TO COMPEL PLAINTIFF TO
PRODUCE UNREDACTED DOCUMENTS**

I, PAMELA C. SPEES, declare and state as follows:

1. I am an attorney with the Center for Constitutional Rights, counsel to Plaintiff Sexual Minorities Uganda ("Plaintiff" or "SMUG") in the above-captioned case and submit this declaration in support of Plaintiff's Opposition to Defendant's Motion to Compel Plaintiff to Produce Unredacted Documents.

2. Attached hereto as Exhibit A is Plaintiff's Responses to Defendant Scott Lively's First Set of Request for Production of Documents, dated October 8, 2014.

3. In response to Defendant's Requests for Production, Plaintiff's counsel conducted a rigorous and expansive search of Plaintiff's electronic and hard copy documents in the custody of its seven staff members in Uganda, reviewing hundreds of thousands of pages in order to locate responsive and/or relevant information.

4. Plaintiff's early productions containing redactions, which were served on December 12 and 19, 2014 and January 26, 2015, contained redactions labeled "REDACTION" due to a technological error.

5. Upon learning recently of the confusion caused by the labeling of redactions in Plaintiff's December 12 and 19 and January 26 productions, Plaintiff began the process of correcting those redactions, and will reproduce those documents with specifically labeled redactions as soon as possible.

6. Subsequent productions comprising the vast majority of documents produced by Plaintiff were served on January 30, February 4, 9, 13, and 18, March 17 and 25, and April 14, 2105. These productions contained specific language over each redaction making the basis for the redaction apparent.

7. Plaintiff made redactions on four grounds, including by redacting information protected by the attorney-client communication and attorney work product privileges under the label "02-Privileged."

8. Plaintiff redacted and labeled as "Personal Data" the following four categories of information: (i) the identifying information for individuals or entities associated with or who have provided some level of support to Plaintiff, including donors, partners, supporters, affiliates, and businesses who accept Plaintiff's patronage for the purpose of organizing workshops or other advocacy or educational events, and who were not witnesses to any events at issue in this litigation; (ii) the email addresses for list-serves through which Plaintiff and non-parties communicate regarding persecution of LGBTI Ugandans and other LGBTI communities around the world; (iii) personal phone numbers of witnesses for whom professional phone numbers were already provided to Defendant; and (iv) Plaintiff's bank account details. Plaintiff

did not redact names of individuals or entities, including businesses who hosted Plaintiff and others' workshops and other events, who are witnesses to events in this action.

9. The unredacted names of individuals and entities who are witnesses to events in this action comprise approximately 138 names.

10. Plaintiff's counsel's review of the documents found that many documents containing responsive information also contained non-responsive information that was both not relevant to any claims or defenses in this action and would reveal Plaintiff's and non-parties' confidential and non-public – but irrelevant – operations. Plaintiff produced such documents and redacted this non-responsive information under the label "01-Non-Responsive."

11. As part of this review process, Plaintiff's counsel found that certain documents discussed the Anti-Homosexuality Bill ("AHB") and were thus responsive to some of Defendant's document requests, but contained information that was both not relevant and would reveal Plaintiff's and non-parties' highly confidential internal and/or non-public campaign strategies to prevent enactment of the Anti-Homosexuality Bill into law. Plaintiff produced otherwise responsive and relevant documents concerning the Anti-Homosexuality Bill with redactions of any discussion of internal and/or non-public strategies to prevent the enactment of the bill into law, labeling such redactions as "03-Non-Responsive." Plaintiff produced unredacted information regarding its external, public advocacy efforts to prevent the enactment of the AHB.

12. Attached hereto as Exhibit B is Plaintiff's Supplemental Responses to Defendant Scott Lively's First Set of Request for Production, dated January 30, 2015.

13. On May 29, 2015, Plaintiff's counsel sent an email to counsel for Defendant identifying the basis for the "03-Non-Responsive" redaction designation in Plaintiff's

Supplemental Responses to Defendant Scott Lively's First Set of Request for Production. A true and correct copy of the May 29 email, which includes the names of witnesses that have been designated as CONFIDENTIAL under the terms of the Protective Order, is attached hereto as Exhibit C.

14. Plaintiff alleges that Defendant was directly involved in the promulgation of the Anti-Homosexuality Bill in Uganda, providing significant support for the bill including revisions, advice, and recommendations. Attached hereto as Exhibit D is a true and correct copy of an April 28, 2009 email sent from Defendant to co-conspirator Martin Ssempe with Defendant's revisions to the bill, with the Bates stamp LIVELY 1252, along with a color version of Defendant's revisions produced separately as LIVELY 4514, provided here for the Court's ease of reference.

15. Attached hereto as Exhibit E is Plaintiff's Second Supplemental Responses to Defendant Scott Lively's First Set of Interrogatories Containing Confidential Information Subject to the Terms of the Protective Order, dated January 2, 2015.

16. Attached hereto as Exhibit F are true and correct copies of email threads produced by Defendant with the Bates stamp LIVELY 3737 and LIVELY 3713.

17. Attached hereto as Exhibit G is Plaintiff's Responses to Defendant Scott Lively's First Set of Interrogatories Containing Confidential Information Subject to the Terms of the Protective Order, dated July 11, 2014.

18. Attached hereto as Exhibit H are documents produced by Plaintiff detailing Plaintiff's public advocacy efforts to counter the Anti-Homosexuality Bill and its resulting harms, with the Bates stamps SMUG007899, SMUG13918, SMUG15771, and SMUG016350.

19. Attached hereto as Exhibit I is custodian and folder source information for documents produced by Plaintiff, which was produce to Defendant by Plaintiff on June 11, 2015.

20. The redactions made on parts of folder source information for documents produced by Plaintiff as detailed in Exhibit I cover less than 0.3% of all documents produced by Plaintiff, and protect information that is both not relevant and protected by the associational privilege. Approximately 80% of Plaintiff's production consisted of emails for which folder information was unnecessary.

21. Defendant neither labeled nor provided folder information for three productions made to Plaintiff, which totaled close to 1700 pages.

22. Attached hereto as Exhibit J is Defendant Scott Lively's Responses and Objections to Plaintiff's First Request for Production of Documents, dated June 12, 2014.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on July 9, 2015, at New York, New York.

/s/Pamela C. Spees
PAMELA C. SPEES

EXHIBIT A

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

SEXUAL MINORITIES UGANDA,)	
)	
<i>Plaintiff,</i>)	Civil Action No.
)	
v.)	3:12-CV-30051
)	
SCOTT LIVELY, individually and as President of Abiding Truth Ministries,)	
)	
<i>Defendant.</i>)	
)	

**PLAINTIFF’S RESPONSES TO DEFENDANT SCOTT LIVELY’S
FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Plaintiff Sexual Minorities Uganda (“SMUG”) objects and responds to Defendant Scott Lively’s First Set of Requests for Documents as follows:

SMUG has not completed the collection of all responsive documents, specifically including those located outside the United States. SMUG will continue to produce responsive documents as they become available. Further, SMUG’s investigation and discovery in this action is continuing. As the action proceeds, SMUG may discover additional documents and, without obligating itself to do so, SMUG reserves the right to supplement the responses with documents that are subsequently discovered.

GENERAL OBJECTIONS

1. SMUG objects to each and every request, definition, and instruction to the extent it seeks to impose any burdens inconsistent with or in addition to SMUG’s obligations under the applicable rules, including the Federal Rules of Civil Procedure and the Local Rules for the District of Massachusetts, or any order of the Court in this matter.

2. SMUG objects to each and every request, definition, and instruction to the extent it seeks information protected by the attorney-client privilege, the work product doctrine, or any other applicable privilege or immunity from production. Inadvertent disclosure of such information shall not constitute the waiver of any applicable privilege, doctrine, immunity, or objection, and nothing contained in SMUG's responses is intended to be, or in any way shall be deemed, a waiver of any such applicable privilege, doctrine, or immunity.

3. SMUG objects to each and every request, definition, and instruction as unduly burdensome to the extent it seeks documents that are already in Defendant's possession, custody, or control or are available from a public source as to which the burden of obtaining such information is the same or less for Defendant as it would be for SMUG.

4. SMUG objects to each and every request, definition, and instruction to the extent that it requires SMUG to draw or render a legal conclusion.

5. SMUG objects to each and every request, definition, and instruction to the extent that it is vague or ambiguous.

6. SMUG objects to each and every request, definition, and instruction to the extent that it is overly broad or unduly burdensome.

7. SMUG objects to each and every request, definition, and instruction to the extent it seeks information about acts or events that are not relevant to any claim or defense in this matter and are not reasonably calculated to lead to the discovery of admissible evidence. SMUG's response to a request does not constitute an admission that any act or event described is relevant or appropriately subject to further discovery in this action.

8. SMUG objects to each and every request, definition, and instruction to the extent that it seeks information from nonparties in contravention of Federal Rules of Civil Procedure 34 and not in SMUG's possession, custody, or control.

9. SMUG objects to all requests on the ground that that they demand that documents be produced on or before October 1, 2014 at a referenced time and location, on the grounds that the demand is unduly burdensome and unreasonable. Subject to SMUG's General Statement, its General Objections and its Specific Objections and Responses, SMUG will produce responsive documents and/or make documents available for review at time(s) and location(s) to be arranged.

10. SMUG objects to Definition No. 1 on the ground that it is overly broad, unduly burdensome, and not reasonably calculated to lead to the discovery of admissible evidence to the extent it includes entities that are legally distinct from SMUG, not parties to this lawsuit, and beyond SMUG's custody or control. SMUG further objects to Definition No. 1 to the extent that it calls for documents protected by the attorney-client privilege and/or the mental impressions, conclusions, opinions, or legal theories of SMUG's attorneys concerning the litigation or are otherwise protected by the attorney work product doctrine.

11. Nothing in these responses is an admission by SMUG of the existence, relevance, or admissibility of any information, for any purpose, or the truth or accuracy of any statement or characterization contained in any request. SMUG reserves all objections and other rights as to relevance, materiality, privilege, and admissibility related to the use of its responses and any document or thing identified in its responses as evidence for any purpose whatsoever in any proceeding in this action or any other action. Each response is without prejudice to, and does not constitute a waiver of, any objection SMUG may make to any future use of the response or documents or things identified in its response to any request.

12. Each and every general objection shall be deemed to be incorporated in full into the specific response to each request. Any specific objections to the request are made in addition to the general objections, not as a replacement for them.

13. SMUG objects to the excessive number of requests propounded by Defendant in Defendant Scott Lively's First Set of Request for Production of Documents. Asking SMUG to respond to 196 individual requests imposes an undue burden and was likely designed to harass. In the interest of expediting discovery and without waiving its objection to the numerousness of this "first set," SMUG has responded herein to each of Defendant's 196 requests for production. However, SMUG will not respond to any further requests for production, unless so instructed by the Court, or unless agreed to by the parties based upon good cause. *Cf.* Local Rule 26.1(c).

Subject to and without waiving the above general objections, SMUG further objects and responds as follows:

RESPONSES TO REQUESTS FOR DOCUMENT PRODUCTION

Request No. 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).

Response to Request No. 1:

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. In addition, SMUG objects that the documents requested related to member organizations are not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG further objects that the terms "organizational and governance" are vague and ambiguous. SMUG

also objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and/or the attorney work product doctrine.

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

Request No. 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.

Response to Request No. 2:

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 the 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 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) (article 4.3). SMUG further objects to the extent that the request 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. In addition, SMUG objects that the documents requested related to member organizations are 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/or the attorney work product doctrine.

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

Request No. 3:

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

Response to Request No. 3:

SMUG objects to this request to the extent it seeks documents protected from disclosure by the attorney-client privilege and the attorney work product doctrine. Subject to and without waiving its general objections, SMUG will produce any responsive documents.

Request No. 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.

Request No. 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.

Response to Interrogatory No. 5:

SMUG objects to this request because it 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 that it calls for privileged attorney work product. Moreover, the sources of international law that define and prohibit "crimes against humanity" are equally or more available to Defendant.

Request No. 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.

Response to Request No. 6:

SMUG objects to this request because it 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 that it calls for privileged attorney work product. Moreover, the sources of international law that proscribe "Persecution on the basis of sexual orientation or transgender status" are equally or more available to Defendant.

Request No. 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.

Response to Request No. 7:

SMUG objects to this request because it 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 that it calls for privileged attorney work product. Moreover, the sources of international law that “define, identify the elements of, interpret, or apply the proscription against Persecution, either generally or on grounds of sexual orientation or transgender status” are equally or more available to Defendant.

Request No. 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.

Request No. 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.

Response to Request No. 9:

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. Moreover, documents that reflect "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" are equally or more available to Defendant. SMUG further objects that the terms "any investigation, prosecution, conviction, punishment or other adverse action taken," "any Ugandan authority," and "any Person" are vague, ambiguous, and overbroad. SMUG also 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); 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). 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.

Request No. 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.

Response to Request No. 10:

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. Moreover, SMUG objects that documents sought relating "to any assistance you or your members claim to have provided to any Person adversely affected by that Anti-Homosexuality Bill" are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking compensation for the diversion of its resources to directly assisting LGBTI persons. SMUG also 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); 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). 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.

Request No. 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.

Response to Request No. 11:

SMUG objects to this request in that the term “All Documents Concerning, and all Documents on which you base the facts and claims” in a 28-page document is overbroad, unduly burdensome, and ambiguous. SMUG also objects that the request seeks additional personal

information concerning individuals whose cases are covered in the reports that is neither relevant to any claim or defense nor reasonably calculated to lead to the discovery of admissible evidence. SMUG is not seeking compensation for the diversion of its resources to directly assisting LGBTI persons nor does SMUG seek remedies for the injuries such persons suffered. SMUG also 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); 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). 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 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.

Request No. 12:

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

Response to Request No. 12:

SMUG 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 that it calls for privileged attorney work product. SMUG also objects to this request to the extent it seeks documents that 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.

Request No. 13:

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

Response to Request No. 13:

SMUG objects that the documents are in Defendant's possession or equally or more available to Defendant. Subject to and without waiving its general objections, SMUG will produce any responsive documents.

Request No. 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.

Response to Request No. 14:

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

Request No. 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.

Response to Request No. 15:

SMUG 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 that it calls for privileged attorney work product. SMUG also objects to this request to the extent it seeks documents that 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..

Request No. 16:

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

Response to Request No. 16:

SMUG objects to this request because the Uganda High Court ruling is equally or more available to Defendant. SMUG further objects that the term "all Documents Concerning said ruling" is vague and ambiguous and objects to the request to the extent it calls for documents protected by the attorney-client privilege and the attorney work product doctrine. 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.

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

Request No. 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.”

Response to Request No. 17:

SMUG also objects to this request to the extent it 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 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 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.

Request No. 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.”

Response to Request No. 18:

SMUG objects to this request because it 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 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 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.

Request No. 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.

Response to Request No. 19:

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

Request No. 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.

Response to Request No. 20:

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

Request No. 21:

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

Response to Request No. 21:

SMUG objects that the documents sought in this request 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.

Request No. 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."

Response to Request No. 22:

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

Request No. 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."

Response to Request No. 23:

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

Request No. 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."

Response to Request No. 24:

SMUG objects that the documents requested are not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG further objects to this request to the extent it calls for privileged attorney work product. Moreover, SMUG objects that literature and research that concludes that "there [is] no evidence of a connection between adult homosexuality and child molestation" are in Defendant's possession or equally or more available to Defendant. Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Request No. 25:

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

Response to Request No. 25:

SMUG objects that the documents requested are not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG

further objects to this request to the extent it calls for privileged attorney work product. Moreover, SMUG objects that literature and research that concludes that “there [is] no evidence of a connection between adult homosexuality and child molestation” 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 the studies referenced in paragraph 74 of the Amended Complaint are publicly available via the website cited in the footnote to that paragraph.

Request No. 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.

Response to Request No. 26:

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 that the documents are in Defendant’s possession or equally or more available to Defendant. SMUG further objects to this request to the extent it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 27:

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 that the documents are in Defendant’s possession or equally or more available to Defendant. SMUG further objects that the request for documents concerning

the allegations and “claims regarding” allegations in eight paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. SMUG further objects to this request to the extent it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 28:

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 that the documents are in Defendant’s possession or equally or more available to Defendant. SMUG further objects to this request to the extent it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.”

Response to Request No. 29:

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 that the documents are in Defendant’s possession or equally or more available to Defendant. SMUG further objects to this request to the extent it calls for

privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 30:

SMUG objects to this request to the extent it calls for privileged attorney work product. 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.

Request No. 31:

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

Response to Request No. 31:

SMUG objects that the documents requested are not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG also 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 that the documents are in Defendant's possession or equally or more available to Defendant. SMUG further objects that the request for documents that "rebut, contradict or disprove" all and any unspecified statements made in a book is overbroad, ambiguous, and unduly burdensome.

Request No. 32:

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

Response to Request No. 32:

SMUG objects that the documents requested are not relevant to any party's claims or defenses nor reasonably calculated to lead to the discovery of admissible evidence. SMUG further objects to this request that calls for privileged attorney work product. SMUG also 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 that the documents equally or more available to Defendant. SMUG further objects that the request for documents that "rebut, contradict or disprove" all and any unspecified statements made in a book is overbroad, ambiguous, and unduly burdensome.

Request No. 33:

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

Response to Request No. 33:

SMUG 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.

Request No. 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."

Response to Request No. 34:

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 that the documents are in Defendant's possession or equally or more available to Defendant. SMUG further objects to this request that calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 35:

SMUG 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 that the terms "actionable conduct" are ambiguous, and that the request is overbroad and unduly burdensome because it is not limited in time or in connection with any specific events. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG also 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 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.

Request No. 36:

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

Response to Request No. 36:

SMUG 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 that it calls for privileged attorney work product. SMUG also 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 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.

Request No. 37:

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

Response to Request No. 37:

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

Request No. 38:

All Documents Concerning the “urgent follow-up meetings” described in paragraphs 105-107 of the Amended Complaint.

Response to Request No. 38:

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

Request No. 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.”

Response to Request No. 39:

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

Request No. 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.”

Response to Request No. 40:

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

Request No. 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.

Response to Request No. 41:

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 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 also objects that requesting “all media reports of the conference” is ambiguous and unduly burdensome. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 42:

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

Response to Request No. 42:

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

Request No. 43:

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

Response to Request No. 43:

SMUG 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.

Request No. 44:

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

Response to Request No. 44:

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

Request No. 45:

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

Response to Request No. 45:

SMUG 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.

Request No. 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.

Response to Request No. 46:

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 that the documents are in Defendant's possession or equally or more available to Defendant. SMUG further objects that the term "all Documents identifying the referenced website" is vague, ambiguous, and overbroad. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 47:

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

Response to Request No. 47:

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 that the documents are in Defendant's possession or equally or more available to Defendant. 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 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). SMUG further 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.

Request No. 48:

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

Response to Request No. 48:

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

Request No. 49:

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

Response to Request No. 49:

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

Request No. 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."

Response to Request No. 50:

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

Request No. 51:

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

Response to Request No. 51:

SMUG 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.

Request No. 52:

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

Response to Request No. 52:

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

Request No. 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.

Response to Request No. 53:

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

Request No. 54:

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

Response to Request No. 54:

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

Request No. 55:

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

Response to Request No. 55:

SMUG 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.

Request No. 56:

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

Response to Request No. 56:

SMUG 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.

Request No. 57:

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

Response to Request No. 57:

SMUG 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.

Request No. 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.

Response to Request No. 58:

SMUG objects to this request to the extent that it misrepresents the allegations of Paragraph 152 of the Amended Complaint and presupposes an incorrect legal theory. SMUG also objects that the request's use of the terms "inspired by, or connected to" is ambiguous, overbroad, and unduly burdensome. In addition, 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 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.

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

Request No. 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.

Response to Request No. 59:

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

Request No. 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."

Response to Request No. 60:

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

Request No. 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."

Response to Request No. 61:

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

Request No. 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.

Response to Request No. 62:

SMUG also objects 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. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 63:

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

Response to Request No. 63:

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.

Request No. 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.

Response to Request No. 64:

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 for documents concerning the allegations and

“claims regarding” allegations in eleven paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. 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 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 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.

Request No. 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.

Response to Request No. 65:

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 for documents concerning allegations in eleven paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 66:

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 for documents concerning eleven paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. 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.

Request No. 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.

Response to Request No. 67:

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 for documents concerning eleven paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. 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.

Request No. 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.

Response to Request No. 68:

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 for documents concerning eleven paragraphs of the Amended Complaint is overbroad, ambiguous,

and burdensome. 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.

Request No. 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.

Response to Request No. 69:

SMUG objects that this request is unreasonably duplicative of Request No. 64 and incorporates herein its specific objections and response to Request No. 64.

Request No. 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.

Response to Request No. 70:

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 for documents concerning the allegations and "claims regarding" allegations in ten paragraphs of the Amended Complaint is overbroad, ambiguous, and burdensome. SMUG further 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 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 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.

Request No. 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.

Response to Request No. 71:

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 in ten paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 72:

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 allegations in ten 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.

Request No. 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.

Response to Request No. 73:

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 ten 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.

Request No. 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.

Response to Request No. 74:

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 ten 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.

Request No. 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.

Response to Request No. 75:

SMUG objects that this request is unreasonably duplicative of Request No. 70 and incorporates herein its specific objections and response to Request No. 70.

Request No. 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.

Response to Request No. 76:

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 and "claims regarding" allegations in eight paragraphs of the Amended Complaint. SMUG further 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.

Request No. 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.

Response to Request No. 77:

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 in eight paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 78:

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 allegations in eight 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.

Request No. 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.

Response to Request No. 79:

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

eight 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.

Request No. 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.

Response to Request No. 80:

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 eight 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.

Request No. 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.

Response to Request No. 81:

SMUG objects that this request is unreasonably duplicative of Request No. 76 and incorporates herein its specific objections and response to Request No. 76.

Request No. 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.

Response to Request No. 82:

SMUG objects to the 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 that the request is overbroad, ambiguous, and burdensome in that it seeks documents concerning allegations and "claims regarding" allegations in five 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 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 on 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.

Request No. 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.

Response to Request No. 83:

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 in five paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 84:

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 five 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.

Request No. 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.

Response to Request No. 85:

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 five 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.

Request No. 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.

Response to Request No. 86:

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 five 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.

Request No. 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.

Response to Request No. 87:

SMUG objects that this request is unreasonably duplicative of Request No. 82 and incorporates herein its specific objections and response to Request No. 82.

Request No. 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.

Response to Request No. 88:

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 ten 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.

Request No. 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.

Response to Request No. 89:

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 in ten paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 90:

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 allegations in ten 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.

Request No. 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.

Response to Request No. 91:

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 allegations in ten 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.

Request No. 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.

Response to Request No. 92:

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 allegations in ten 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.

Request No. 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.

Response to Request No. 93:

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 six

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.

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

Request No. 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.

Response to Request No. 94:

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 in six paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 95:

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 allegations in five 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.

Request No. 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.

Response to Request No. 96:

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 allegations in six 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.

Request No. 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.

Response to Request No. 97:

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 allegations in six 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.

Request No. 98:

The article described in paragraph 212 of the Amended Complaint.

Response to Request No. 98:

SMUG objects that the document is 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.

Request No. 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.

Response to Request No. 99:

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 eleven 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 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 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.

Request No. 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.

Response to Request No. 100:

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 eleven paragraphs of the Amended Complaint. SMUG further objects to this request to the extent that it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 101:

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 allegations in eleven 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.

Request No. 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.

Response to Request No. 102:

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 allegations in eleven paragraphs of the Amend 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.

Request No. 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.

Response to Request No. 103:

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 allegations in eleven 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.

Request No. 104:

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

Response to Request No. 104:

SMUG objects that this request is unreasonably duplicative of Request No. 99 and incorporates herein its specific objections and response to Request No. 99.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Response to Request No. 110:

SMUG objects that the request seeks information about acts or events that are not relevant to any claim or defense in this matter and are not reasonably calculated to lead to the discovery of admissible evidence. SMUG included the death of David Kato in paragraphs 10 and 222 of the Amended Complaint in order to present a complete narrative of a SMUG staff member who had been subject to the persecution alleged in the complaint and subsequently died. SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint. . SMUG further objects that the term "investigate" is vague and ambiguous. SMUG also 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 this request to the extent it calls for documents protected by the attorney-client privilege and the attorney work product doctrine.

Request No. 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.

Response to Request No. 111:

SMUG objects that the request seeks information about acts or events that are not relevant to any claim or defense in this matter and are not reasonably calculated to lead to the discovery of admissible evidence. SMUG included the death of David Kato in paragraphs 10 and 222 of the Amended Complaint in order to present a complete narrative of a SMUG staff member who had been subject to the persecution alleged in the complaint and subsequently died. SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint. SMUG further objects that this request mischaracterizes the

allegations in the Amended Complaint. SMUG also 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 this request to the extent it calls for documents protected by the attorney-client privilege and the attorney work product doctrine.

Request No. 112:

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

Response to Request No. 112:

SMUG objects that the request seeks information about acts or events that are not relevant to any claim or defense in this matter and are not reasonably calculated to lead to the discovery of admissible evidence. SMUG is not relying on the death of David Kato to show Defendant's liability for the events alleged in the Amended Complaint. SMUG included the death of David Kato in paragraphs 10 and 222 of the Amended Complaint in order to present a complete narrative of a SMUG staff member who had been subject to the persecution alleged in the complaint and subsequently died.

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

Request No. 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).

Response to Request No. 113:

As stated in its response to Defendant's Interrogatory No. 12, SMUG objects to this request because it is unduly burdensome and because it seeks information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG further objects to the 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 that the documents are in Defendant's possession or equally or more available to Defendant. SMUG further objects to this request to the extent it calls for privileged attorney work product.

Request No. 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).

Response to Request No. 114:

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 to this request to the extent it calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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).

Response to Request No. 115:

SMUG objects that this request is unreasonably duplicative of Request No. 114 and incorporates herein its specific objections and response to Request No. 114.

Request No. 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).

Response to Request No. 116:

SMUG objects that this request is unreasonably duplicative of Request No. 114 and incorporates herein its specific objections and response to Request No. 114.

Request No. 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).

Response to Request No. 117:

SMUG objects that this request is unreasonably duplicative of Request No. 114 and incorporates herein its specific objections and response to Request No. 114.

Request No. 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).

Response to Request No. 118:

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 the extent this request calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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).

Response to Request No. 119:

SMUG objects that this request is unreasonably duplicative of Request No. 118 and incorporates herein its specific objections and response to Request No. 118.

Request No. 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).

Response to Request No. 120:

SMUG objects that this request is unreasonably duplicative of Request No. 118 and incorporates herein its specific objections and response to Request No. 118.

Request No. 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).

Response to Request No. 121:

SMUG objects that this request is unreasonably duplicative of Request No. 118 and incorporates herein its specific objections and response to Request No. 118.

Request No. 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).

Response to Request No. 122.

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 the extent this request calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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.

Response to Request No. 123:

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 the extent this request calls for privileged attorney work product. Subject to and without waiving its specific and general objections, SMUG states that it will produce any responsive documents.

Request No. 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).

Response to Request No. 124:

SMUG objects to this request because it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence because SMUG is not seeking compensation for the diversion of its resources to directly assisting individual LGBTI persons, as SMUG previously explained in its response to Defendant’s Interrogatory No. 6.

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 that the request is overbroad and unduly burdensome. SMUG further objects to this request to the extent that it calls for privileged attorney work product. SMUG also 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 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).

Request No. 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.

Response to Request No. 125:

SMUG objects to this request because it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. SMUG also objects that this request 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.

Request No. 126:

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

Response to Request No. 126:

SMUG objects to this request because it seeks documents that are neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. 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 that the request is overbroad and unduly burdensome. 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.

Request No. 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.

Request No. 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.

Request No. 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 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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 (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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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.

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 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 178:

All Communications and Documents exchanged between YOU (including your officers, directors, agents, servants, employees, partners, or attorneys) and RAINBOW HEALTH FOUNDATION MBARRA (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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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 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.

Request No. 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.

Request No. 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 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.

Request No. 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.”

Response to Request No. 193:

SMUG objects that this request is overbroad and unduly burdensome. SMUG further objects that this request is unreasonably duplicative of Request Nos. 1 and 2 and incorporates herein its specific objections and responses to Request Nos. 1 and 2.

Request No. 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.”

Response to Request No. 194:

SMUG objects that this request is overbroad and unduly burdensome. 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. Subject to and without waiving its specific and general objections, SMUG will produce any responsive documents.

Request No. 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.”

Response to Request No. 195:

SMUG objects that this request is overbroad and unduly burdensome. SMUG further 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 the request seeks documents protected by the attorney-client privilege and the attorney work product doctrine.

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

Request No. 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.”

Response to Request No. 196:

SMUG objects that this request is overbroad and unduly burdensome. SMUG further objects that this request is unreasonably duplicative of Request Nos. 114 to 121 and incorporates herein its specific objections and responses to Request Nos. 114 to 121.

Dated: October 8, 2014
New York, NY

/s/Gina S. Spiegelman
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Counsel for Plaintiff

EXHIBIT B

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

SEXUAL MINORITIES UGANDA,

Plaintiff,

v.

Civil Action No.

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

3:12-CV-30051

Defendant.

**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 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 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. 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 Ssempe, 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 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. 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 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. 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 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. 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

EXHIBIT D



Scott Lively <sdllaw@gmail.com>

Here is what we have so far

Scott Lively <sdllaw@gmail.com>

Tue, Apr 28, 2009 at 1:04 PM

To: Martin Ssempe <ssempam@gmail.com>

Here's my revision, attached

On Mon, Apr 27, 2009 at 4:49 PM, Martin Ssempe <ssempam@gmail.com> wrote:

Dear Scott,

Kindly find our progress as below. Please make additional changes where needed. Also if you need you can make track changes.

If possible send me you cell or phone as I lost your card.

Martin Ssempe

On Apr 26, 2009, at 1:57 AM, Scott Lively wrote:

I'll give this some attention tomorrow

On Sat, Apr 25, 2009 at 6:12 PM, Martin Ssempe <ssempam@gmail.com> wrote:

Dear Scott,

Further to my message yesterday, we spent sometime working on the draft with some legislators. There is no precedence we found, but decided to proceed anyway. Kindly find a draft and we ask that you give your careful input. How can we make it stronger, and make our nation a model to lead the world on this issue. Kindly take a look as soon as possible and give your input. Maybe use track changes. Thanks very much. Do give me a response if you get this mail.

Your teaching did so much for all of us. Blessings indeed. I have worked on the Family Policy Center.

Pr. Martin Ssempe

 Uganda Anti_Homosexual_update[1].doc
54K

I encourage moderation in sentencing. Even my suggested modifications may be too harsh, but I'll leave that to you.

More important to me is that you emphasize rehabilitation and prevention. I have added two sections that will accomplish that.

Otherwise, this looks like it will solve your problems.

Regards,

Dr. Scott Lively

APRIL20, 2009

THE ANTI - HOMOSEXUALITY BILL, 2009

MEMORANDUM

1. The Principle

The object of the Bill is to create a comprehensive legislation which prohibits homosexuality that includes male to male sex, female to female sex and related sexual offences in Uganda.

Given our historical, legal, cultural and religious value to heterosexual relationships as the basis of our society, the bill aims at strengthening the nation's capacity to deal with the emerging internal and external threats to traditional heterosexual family. Which includes: redefining human rights to elevate homosexuality as a legitimate human right, where as it is self evidently perverted, disordered and unnatural. This being advanced using new terms like "sexual orientation", "sexual minorities" and "gender identity" as new forms special sexual rights. The Republic of Uganda needs a comprehensive and enhanced legislation to protect our cultural, legal, religious, and traditional family values.

There is also need to protect our children and youth who are made vulnerable to

sexual abuse and deviation as a result cultural changes, uncensored information technologies, and parentless child developmental settings.

2. Defects in the existing law.

The penal code act does not explicitly address the issue of same sex unions and gender identity disorders which is damaging the social fabric of our nation at an alarming level hence the need for legislation to provide for charging, investigating, prosecuting, convicting and sentencing of offenders on the above law. There is need for equal treatment of man and women before the law in regard to homosexual offenses.

This legislation comes to complement and supplement the provisions of the constitution of Uganda and the penal code Act by not only criminalizing same sex marriages but same -sex sexual acts and other related acts.

3.1. The object of the Bill

The object of the Bill is -

- (a) To prohibit Homosexuality and related to practices in Uganda.
- (b) To prevent the threat to the survival and stability of the natural family institution which is the basic unit of the society.
- (c) To safe guard the health of Ugandan citizens from the antecedent heath effects of homosexuality and related practices.
- (d) To promote Co-operation with other Countries in combating homosexuality and related practices.
- (e) To prohibit ratification of any international treaties, conventions, protocols and declarations which are contrary or inconsistent with the provisions of this Act.
- (f) To ensure through public education and social services that Ugandan children and youths receive age-appropriate instruction and guidance at every age level which helps them to understand and embrace healthy marriage and family life as a personal goal.

3.2. Part 1 of the Bill incorporating clause 1 and 2 provides for Preliminary matters relating to commencement and Interpretation of the words and phrases used in the Bill

3.3. Part II of the Bill in clauses 3 to 6 prohibits homosexuality and related practices by introducing the offences of engaging in homosexuality, and the penalties of imprisonment upon conviction. This part also creates offences and penalties for acts that promote homosexuality, failure to report the offence and impose a duty on the Community to report Suspected Cases of the homosexuality.

3.4 .Part III of the Bill of clauses 7 to 9 provides for the jurisdiction of Ugandan Courts in Case of Homosexuality, including extra territorial Jurisdiction with consent of the Attorney General.

3.5. PART IV of the Bill in clauses 10 and 11 provides for miscellaneous provisions on international treaties, protocols, declarations and conventions and the minister to make regulations to give effect to the Act.

4. Schedule 1 of the Bill gives the value of the currency.

Hon. David Bahati
Ndorwa County West
Kabale District.

ARRANGEMENT OF CLAUSES

PART I ---PRELIMINARY

Clause.

1. Commencement
2. Interpretation

PART II – PROHIBITION OF HOMOSEXUALITY

3. Offence of Homosexuality
4. Aggravated Homosexuality
5. Promoting Homosexuality
6. Failure to report offence

PART III – JURISDICTION

7. Jurisdiction
8. Extra – territorial Jurisdiction
9. Extradition

PARTIV---MISCELLANEOUS PROVISIONS

10. International treaties
11. Regulations
12. Proactive measures to inculcate heterosexual norms
13. Therapy as a sentencing alternative

Schedule 1

Currency point.

PART I - PRELIMINARY

1 – Commencement

This Act shall come into force upon publication in the Gazette.

2 - Interpretation

In this Act, unless the Context otherwise requires –

“Gender” means male or female;

“Homosexuality” means same gender or same sex sexual acts;

“Homosexual” a person who engages or attempts to engage in same gender sexual

activity.

“Minister” means the minister responsible for Ethics and Integrity.

“Sexual act” means –

- (a) Stimulation or penetration of a vagina or mouth or anus, however slight of any person by a sexual organ;
- (b) The use of any object or organ by a person on another person’s sexual organ or anus or mouth;

“Sexual organ” means-a vagina or penis.

PART II: PROHIBITION OF HOMOSEXUALITY AND RELATED PRACTICES

3. Prohibition of homosexuality

- (1) Homosexuality is prohibited.
- (2) Any person who engages in homosexuality contrary to sub-section (1) commits an offense and on conviction is liable to a fine not exceeding 500 currency points or imprisonment not exceeding ~~10~~ years or both. Not to exceed 6 months for a first offense

4. Aggravated homosexuality

- (1) Any person who commits the offense mentioned in section 2(1) above with another person who is below the age of 18 years in any of the circumstances specified in sub-section (2) commits an offense called aggravated homosexuality and on conviction by a competent court liable to suffer ~~death~~ imprisonment not to exceed twenty years, except when the offender is infected with HIV/AIDS and knows that he or she is infected, in which case he shall be subject to imprisonment for life.
- (2) The circumstances referred to in sub-section (1) are as follows: -
 - (a) Where the person against whom the offense is committed is below the age of ~~14~~ 16;
 - (b) Where the offender is infected with HIV/AIDS, and knows that he

or she is infected;

- (c) Where the offender is a parent or guardian or a person in authority over, the person against whom the offense is committed;
 - (d) Where the victim of the offense is a person with disability; or
 - (e) Where the offender is a serial offender.
- (3) Any person who attempts to commit the offense of homosexuality with another person below 18 years in any of the circumstances specifies in sub-section (2), commits an offense and is liable on conviction to imprisonment for life.
- (4) Where a person is charged with the offense under this section, that person shall undergo a medical examination as to his or her HIV status.
- (5) Any person who without the consent of an adult victim being under their authority or not commits the offense mentioned in this section

5. Promotion of homosexuality

- (1) Any person who,
- (a) Participates in production, trafficking, procuring, marketing, broadcasting, disseminating, publishing homosexual materials;
 - (b) Funds or sponsors homosexuality and related activities
 - (c) Offers premises and other fixed or movable assets
 - (d) Uses electronic devices which include internet, films, mobile phone and
 - (f) Who acts as an accomplice or attempts to legitimize or in any way abets homosexuality and related practices
- Commits an offense and on conviction is liable to a fine of five thousand currency points or life imprisonment of a term not to exceed five years.
- (2) Where the offender is a corporate body or a business or an Association or an NGO, upon conviction its certificate of registration shall be cancelled and the Director(s) or proprietors or promoter(s) shall be criminally liable.

6. Failure to report the offense

Any person who being aware of the commission of any offense under this Act omits to report the offense to the relevant authorities within 24 hours commits an offense and on conviction is liable to a fine not exceeding five hundred currency point or imprisonment not exceeding two years.

PART IV ---JURISDICTION

7. Jurisdiction.

Save for aggravated homosexuality which shall be tried by the High Court, other offenses under this Act shall be tried by the Magistrates Court.

8. Extra – Territorial Jurisdiction.

This Act shall apply to offences Committed outside Uganda Where-

- (1) A person who, while being a citizen of, or permanently residing in Uganda, Commits an act Out side Uganda, which act would Constitute an offence had it been Committed in Uganda.
- (2) The offence was committed partly outside and or partly in Uganda.

9. Extradition.

A person charged with offence under this Act shall be liable to extradition under the existing Extradition laws.

PART V---MISCELLANEOUS

10. Nullification of inconsistent International treaties, protocols, declarations and conventions.

- (1). Any international legal instrument whose provisions are contradictory to the spirit and provisions enshrined in this Act, are null and void to the extent of their inconsistency.
- (2). The foreign definitions of “sexual orientation”, “sexual rights”, “sexual minorities”, “gender identity” shall not be used in anyway to legitimize homosexuality, gender identity disorders and related practices in Uganda.

11. Regulations.

The Minister may by statutory instrument make regulations to effect implementation of the provisions of this Act, and Promote this objects.

SCHEDULE 1

CURRENCY POINT

One currency point is equivalent to twenty thousand Shillings.

12. To prevent harmful outside influences from corrupting the youth, and to further ensure that homosexual and other harmful sexual lifestyles cannot take root in our society, the government of Uganda will take all reasonable measures to ensure that children within its jurisdiction are prepared for healthy marriage and family life through age appropriate instruction on 1) the importance and value of marriage to individuals and to society, 2) the optimal traits and virtues that help men and women to be good husbands and wives, 3) the physical, emotional and social harms which result from promiscuity and sexual deviance.

The Minister will work with specialists in the fields of education and family life and all government agencies which interact directly or indirectly with children to develop practical means of implementing this section.

13. Any person who is arrested for homosexuality in Uganda may request a reasonable delay in sentencing in order to obtain reparative therapy, at his or her own expense, with a government approved medical professional. In this event, sentencing may be delayed indefinitely while such therapy is ongoing, subject to regular reporting by the medical professional to the court. Upon a certification by the medical professional that the party no longer poses a significant threat of re-offending, the court shall close the case.

This section shall not be available for those charged with aggravated homosexuality.

At such time as the government approves medical professionals who are qualified to treat homosexual disorder, the government shall inform the public, including specifically all school counselors, that treatment for homosexuality is now available in Uganda, and that anyone who suffers from unwanted homosexual

feelings is encouraged to seek therapy, and that the confidentiality of all such therapy will be scrupulously protected.

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Bahati

County West

District.

Hon. David

Ndorwa

Kabale

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DOCUMENT FILED UNDER SEAL

PURSUANT TO

ORDER REGARDING CONFIDENTIALITY OF CERTAIN DISCOVERY MATERIAL

(Dkt. No. 106)

EXHIBIT E

EXHIBIT F



Scott Lively <sdllaw@gmail.com>

Policy suggestion

3 messages

Scott Lively <sdllaw@gmail.com>

Fri, Aug 9, 2013 at 3:29 PM

To: Stephen Langa <stephenlanga@gmail.com>, Martin Ssempe <ssempam@gmail.com>, charles tuhaise <ctuhaise@yahoo.com>

Brothers,

I am sending you the text of a letter I will send to President Putin next week. It is for your eyes only until then.

You may have already thought of doing this but I think Uganda should drop the Anti-Homosexuality Bill and adopt the anti-propaganda law that was just passed in Russia. It will accomplish the objective of stopping foreign interference in Uganda, and the destructive propaganda efforts of groups like SMUG, while preserving basic civil rights of homosexuals to live their lives privately and discretely in the society. It would change the entire international debate about Uganda, and give you a strong ally in Russia and the several East European countries that are also following Russia's lead.

Please pass this suggestion along to those who could bring it up for debate.

Blessings,

Scott

Letter to Russian President Vladimir Putin

**23, Ilyinka Street,
Moscow, 103132, Russia.**

Dear President Putin,

On behalf of millions of Americans who are concerned about the seemingly unstoppable spread of homosexuality in our country and internationally, I want to express my heartfelt gratitude that your nation has take a strong and unequivocal stand against this scourge by banning homosexual propaganda in your country. You have set an example of moral leadership that has shamed the governments of Western Europe and North America and inspired the rest of the world. Already Lithuania, Moldova, Hungary and Ukraine have begun to follow your example, and you have engendered real hope in the international pro-family movement that this destructive "gay" agenda might finally begin to be rolled back across the globe.

As a long-time leader in the pro-family movement who toured your country in 2006 and 2007 advocating the very policy you have enacted, I want to caution you not to assume that you have fully solved the problem by the enactment of this law. The battle to protect your society from homosexualization has only just begun, and you may be surprised to discover in the coming months and years just how aggressively other world leaders will work to try to force you to capitulate to homosexual demands.

Few social forces in the history of mankind have exhibited the tenacity and resolve of the homosexual movement. Its activists are driven by an implacable militancy and a zeal to advance their own selfish interests that rivals even the most fanatical religious sects. A glimpse at the spirit behind the movement can be seen in the Bible in Genesis 19:4-11.

In just fifty years this tiny group representing only 2% of the population has, through sheer will-power, gained more influence in the legislatures and courtrooms of the western world than the Christian church. The sexual conduct that defines their identity as individuals and as a movement was almost universally illegal during the years our two nations were allied against the threat of Nazism, but just a little more than half a century later homosexual leaders and surrogates sit in a majority of the seats of power across the west, and increasing in the east and in developing nations as well.

In readying your society to recognize and counter the efforts of the "gay" movement it is important to understand that their propaganda and policies adhere invariably to the narrative that "All disapproval of homosexuality leads inevitably to hatred, violence and murder of homosexuals." All of the pro-homosexual policies in the United States and Europe rest on this unstated and unchallenged but false premise. Thus, the homosexual movement is not seeking "tolerance," or "acceptance," but control. They want the power to stamp out all disapproval of homosexuality in your society and to force every citizen (especially the youth) to embrace the view that homosexuality is good and normal.

They ask for "a place at the table," but once they have one all the social ideals they exploited to get there, such as "tolerance," freedom of speech," and respect for "diversity, are abandoned. In place of those ideals is a new upside-down morality that condemns disapproval of homosexuality as intolerable bigotry. I have termed this phenomenon "Homo-Fascism" and defined it as "a form of extreme left-wing radicalism which attempts to establish rigid totalitarian controls over public discussions and policies addressing sexual morality, and to punish or suppress all disapproval of homosexuality and related sexual behaviors."

In the coming months and years Russia and its people will be increasingly portrayed as murderous haters, intent on exterminating homosexuals. Indeed, the propaganda campaign on that theme has already begun, with video footage purporting to show Russian neo-Nazis beating homosexuals now being circulated on the Internet, along with the false implication that this is the intent of your policy. The same propaganda machinery has been grinding away against the country of Uganda since 2009 when it introduced (but never passed) an Anti-Homosexuality Bill that I agree was far too harsh but which never reflected an intention of the Ugandan government to exterminate homosexuals as "gay" activists and their media allies continue to claim.

Indeed, this "gay" narrative that equates opposition to homosexuality with Nazi-like "genocide" is in part an attempt to obscure the ugly roots of the modern homosexual movement in pre-Nazi Germany. German fascism was formed and facilitated by masculine-oriented male homosexuals in response to an effeminate model of homosexuality which held that all homosexual men were actually female souls trapped in men's bodies. Beginning in the 1860s the "Femmes," following the "Grandfather of Gay Rights," Karl Heinrich Ulrichs, built a powerful social movement in Germany which focused on repealing the sodomy laws.

Offended by the constant characterization of male homosexuality as effeminate, the masculine-oriented "Butches" created their own movement grounded in the male warrior-cult philosophy epitomized by ancient Sparta. These were the first German fascists and from their ranks came first the "Storm Troopers" of World War I and then the Nazi Party. This thesis is heavily documented in my book *The Pink Swastika: Homosexuality in the Nazi Party*, which I co-authored with researcher Kevin E. Abrams.

I am sending you along with this letter a copy of *The Pink Swastika* in English that is autographed by both of us. We will soon be completing a long-delayed process of publishing the book in Russian, and hereby pledge that we will dedicate the Russian version of *The Pink Swastika* to the Russian Government and it's People. It will be our honor to send the very first copy of the Russian version to you.

Once again, thank you, President Putin, for standing strong in defense of the natural family, which is the essential foundation of civilization. Perhaps through the inspiration of your leadership an alliance of the good people of my country with those of your own, can again in some spiritual fashion, rescue the future from a destructive monster, just as we did in World War II.

Respectfully,

Pastor Scott Lively, J.D., Th.D.

Stephen Langa <stephenlanga@gmail.com>
To: Scott Lively <sdllaw@gmail.com>
Cc: Martin Ssempe <ssempe@gmail.com>, charles tuhaise <ctuhaise@yahoo.com>

Fri, Aug 9, 2013 at 11:45 PM

Dear Scott,

This is a good gesture of support and goodwill to the Russian President.

Bless you.

SL
[Quoted text hidden]

Scott Lively <sdllaw@gmail.com>

To: Scott Lively <psalm37nasb@gmail.com>

Fri, Apr 11, 2014 at 3:05 PM

[Quoted text hidden]



Scott Lively <sdllaw@gmail.com>

Were you aware of this?

3 messages

Scott Lively <sdllaw@gmail.com> Tue, Aug 14, 2012 at 12:19 PM
To: Martin Ssempe <ssempam@gmail.com>, Stephen Langa <stephenlanga@gmail.com>, charles tuhaise <ctuhaise@yahoo.com>

<http://www.southfloridagaynews.com/news/world-news/6882-1st-gay-pride-celebrated-in-ultra-homophobic-uganda.html>

charles tuhaise <ctuhaise@yahoo.com> Thu, Aug 16, 2012 at 5:32 AM
To: Martin Ssempe <ssempam@gmail.com>, Stephen Langa <stephenlanga@gmail.com>, Scott Lively <sdllaw@gmail.com>

Wasn't aware of the event in Entebbe. This kinds of things will continue until we get a law passed by Parliament to stop them. Parliament is currently debating the Budget and will finish the debate latest August 30. Thereafter we will push for the Bahati Bill to get priority consideration. CT

--- On Tue, 8/14/12, Scott Lively <sdllaw@gmail.com> wrote:

From: Scott Lively <sdllaw@gmail.com>
Subject: Were you aware of this?
To: "Martin Ssempe" <ssempam@gmail.com>, "Stephen Langa" <stephenlanga@gmail.com>, "charles tuhaise" <ctuhaise@yahoo.com>
Date: Tuesday, August 14, 2012, 9:19 AM

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Scott Lively <sdllaw@gmail.com> Thu, Apr 10, 2014 at 2:07 PM
To: Scott Lively <psalm37nasb@gmail.com>

[Quoted text hidden]

DOCUMENT FILED UNDER SEAL

PURSUANT TO

ORDER REGARDING CONFIDENTIALITY OF CERTAIN DISCOVERY MATERIAL

(Dkt. No. 106)

EXHIBIT G

EXHIBIT H



**Civil Society Coalition on Human Rights
& Constitutional Law**

C/o Refugee Law Project
Plot 5, Perryman's Gardens
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CALL TO ACTION!

EVENT NAME: Global Day of action against the AHB.

WHEN: 10th February 2014

WHERE: World Wide

WHAT: Urgent call for solidarity after the recent passage of the Anti homosexuality bill by the Ugandan parliament.

Background

On 20th December 2013, The Lesbian Gay Bisexual Transgender Intersex (LGBTI) Community in Uganda woke up to the grim news that the Anti Homosexuality bill, which had been shelved at the end of 2012, had been passed by Parliament. The bill was passed without Quorum and without Prior mandatory inclusion on the Parliament Order Paper.

The bill, if passed into law will be a disaster to the Human Rights of LGBTI people, a disaster to public health and the fight against HIV/AIDS.

Recent reports in the national and International Media have indicated that the President 'will not sign' the bill and hence it is generally believed that the bill is no longer a threat.

We would like to reiterate that this bill is still a huge threat and a treasure to the majority of Ugandans.

It is also worth to note that the power of ascension of a bill doesn't lay primarily with the President of Uganda. The Parliament of Uganda can also pass the bill into law!

In the case of a private members bill, The Constitution provides that the president shall within 30 days after a bill is presented to him/her either:-

- Assent to the bill
- Return the bill to parliament with a request that the bill or a particular provision of it be reconsidered by parliament; or
- Notify the speaker in writing about the decision

The bill may be reconsidered and then presented for the president's approval. However it may become law without the president's assent if he/she returns it to parliament two times. It should have the support of at least two-thirds of all MPs.

Why the Day of Action?

The 30 days provided for the bill to be passed into law are quickly running out!

If we remain silent, we shall suffer at the hands of Ugandan leaders that have no respect for Human Rights! Silence will not protect us!! We need to speak out against Injustice; and we need to Demand FOR Human Rights! We must speak out loudly against the Anti Homosexuality Bill. We need to Let Uganda know, through this Day of Action, that 'the world is watching'.

Now that you know why we need to 'ACT', Here is 'Bucket list' of the actions you can take on 10th February 2014 to support the Lesbian, Gay Bisexual, Transgender, Intersex(LGBTI) Persons at Risk in Uganda

1. **Worldwide demonstrations.** We call upon all partners, friends and allies to organize worldwide demonstrations in different cities around the world on the (10th February 2014) to show solidarity with Ugandan LGBT community and to bring attention this cause to Uganda. You can do this at a Ugandan embassy or at any place of significance to you.
2. **Issue statements** condemning the passage of the Bill and call on the President NOT to sign it into law, It is also important to continue to remind Ugandans and our leaders to uphold Human Rights for all people.
3. **Wear** a t-shirt, a bracelet, a badge, Carry a poster with a message of solidarity for the LGBT community in Uganda etc. Wear these items to work, at home, wherever you are. Make sure to let us know that you have done this, Tweet the message or picture to the following handles: @Ugandans4rights.
Hashtags: #AHBGlobaldayofaction , #Love4UgandanLGBTI #stopAHB ,
Post on our face book page:
https://www.facebook.com/events/1393461854247237/?context=create&ref_dashboard_filter=upcoming , Or simply email us and let us know.
4. **Deliver Petitions** with signatures to a significant place or to a significant person and or people to show that we have numbers that oppose this bill.
5. **Hold prayer vigils** to show what a 'dark day' it is for Human Rights and to call upon 'Devine Intervention'. We need to mourn the loss of human rights.
6. **Write** to your political leader, your religious leader, your opinion leader to encourage them to speak out against the bill. We need help to end this targeted attack on the rights of LGBT persons in Uganda.
7. **Twitter blast-** The idea is to send as many tweets on that day to the *prime minister, Parliament, and president's office*. This can be done between 9am and 12am-Ugandan time. With one simple message: 'Don't Prosecute; Protect LGBT Ugandans. The world is watching'
Twitter handles are:
Prime Minister:@AmamaMbabazi
Parliament of Uganda:@Parliament_UG
President's office:@StateHouseUg
8. Use social media to speak out against the bill on that day. Write a solidarity message:
Injustice anywhere is Injustice everywhere: I Stand in Solidarity with LGBTI community in Uganda. I stand on the side of Human Rights. I say NO to the Anti-Gay Bill.
9. **Things to remember:**
 - Make sure you have called that media house you work with to cover your event or show of solidarity, we need Uganda, Africa and the whole world to know that we are visible, and to know that Human Rights are Universal and Inherent for all Human Beings.
 - Plan your actions between 9am and 12am Ugandan time. Choose an Action that best suits you.

Reach out to your family members, your co-worker, your friend, your partner; Make sure they join you in speaking out for Human Rights and against the bill.

Thank You for the continued Solidarity!

Civil Society Coalition on Human Rights and Constitutional Law coordinating Team.



CIVIL SOCIETY COALITION ON HUMAN RIGHTS AND CONSTITUTIONAL LAW

WE URGE ALL UGANDANS TO RESPECT AND UPHOLD HUMAN RIGHTS FOR ALL UGANDANS



Refugee Law Project



The Anti-Homosexuality Bill is back in Parliament, despite three years of domestic and international outcry. If passed, it is the Bill which would entrench a complete disregard and disrespect for the principle of Human Rights for all Ugandans.

Now is the time to Kill the Bill once and for all - before it kills your mothers, fathers, sons, daughters, brothers and sisters!

The Anti-Homosexuality Bill (AHB) – Know the Facts!

Uganda is ...

A country grounded in a strong constitution and thriving on the rule of law

The Anti-Homosexuality Bill is not constitutional. It violates the Constitution and subjects the country to the beliefs of a few, rather than the laws of a nation. The following clauses violate Uganda's constitution and the international laws to which we are party:

- The prohibition of homosexuality in the opening paragraph and Clauses 2, 15, 16, and 17 of the bill violates the constitutional rights to privacy, to equality and to non-discrimination.
- Clauses 5 and 6 erroneously label "victims" of homosexuality. However, there can be no victim where there is consenting sexual activity between same-sex adults.
- Clause 13 violates the rights to freedom of speech, expression, association, and assembly contained in Article 29 of the 1995 Constitution.
- Clause 18 is against Article 257 of the 1995 Constitution.
- Clauses 4, 7, and 8 violate the International Covenant on Civil and Political Rights which obliges States to protect the right to privacy by not criminalizing sexual activity between consenting same-sex adults.

A country where leaders protect, listen and represent each and every citizen's issues without stigmatization and prejudice.

Since 2009 after the bill was introduced, we have monitored with concern an increased level of hate speech and active calls for discrimination from different institutional leaders towards the Sexual and Gender minorities in Uganda. Most of these institutional leaders have unfortunately been speaking from an uninformed point of view, with total disregard for the adverse effects their statements in public have on a group that already faces stigmatization in every area of their lives. As leaders, the public follows your counsel, they listen to you, it is important that you send out a strong message of reconciliation and protection of any minority group, however unpopular it is.

A country that recognizes the equality of all human beings and outlaws discrimination.

The AHB erodes the values of our nation by providing for selective recognition of human rights. Uganda believes in respect and non-violence for all citizens. This bill openly provides for targeted discrimination of individuals. We need to draw the line – today it is one group, tomorrow it will be another group/ ethnicity/ religion/ sex. Equal protection under the law for everybody is what will take us to greater heights as Uganda!

A peaceful and hospitable country with a positive and non-violent culture.

We are a country that draws strength in our diversity. Our culture is one of respect, tolerance and non-violence. We cannot accept fueling sentiments of hatred and persecution in the name of culture. The AHB is a threat to the peaceful co-existence of our diverse country and a breeding ground for other forms of discrimination and intolerance. Persecution of this kind has no place in any community guided by the values of loving one's neighbor.

A country that prioritizes the future of our children and development of our nation

The AHB diverts attention from the critical development priorities of the country. By making fraudulent links between homosexuality and criminal offences, it undermines the nation's ability to find real solutions to real problems. For example, in a 2005 study 98% of all children interviewed reported experiencing physical and emotional violence. The study further showed that the manifestation on violence depended on sex, age and social status of the child. The majority of child sexual abuse is perpetrated by heterosexuals, and all child abuse is a criminal offence of the highest gravity whether committed as a heterosexual or homosexual act. What we need is to protect all our children from all forms of sexual violence by strengthening the Children's Act: in its entire 58 pages the current act makes no mention of sexual abuse or molestation.

The Anti-Homosexuality Bill would NOT protect the vast majority of Ugandan children who are at risk of abuse by heterosexual adults.

A country that acts based on reason and evidence

There is no evidence to support the premise of the Bill, i.e. the existence of promotion and recruitment into homosexuality in Uganda. The Bill is rooted in biased judgments and spurious accusations rather than facts and reality. Basing an entire bill on misinformation is unacceptable!

A country that protects its citizens, not harms them

The AHB will cause damage to its citizens in innumerable unjust ways including unlawful prosecution and institutional discrimination, leading to family rejection, bullying, and high suicide rates. Is this the Uganda we want for our children and relatives?

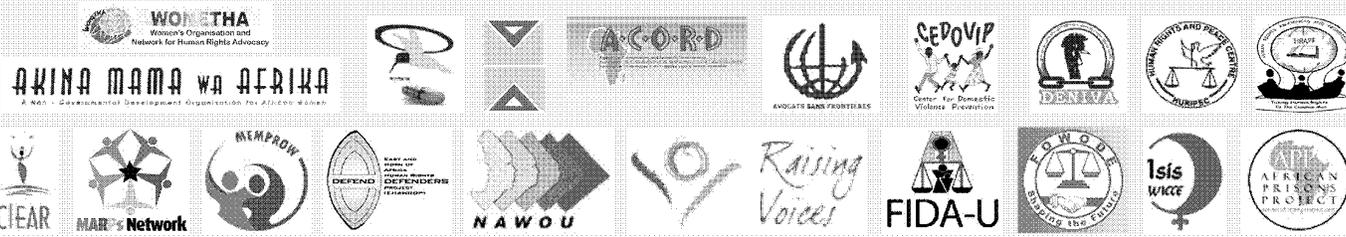
A country that is working hard to curtail the spread of HIV/AIDS .

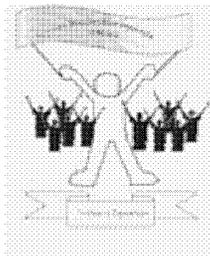
Standard public health practice to curtail HIV/AIDS has long recognized that stigmatizing people and treating them as criminals frightens them away from coming forward for treatment and information that can ensure that they engage in safe sex practices. Uganda's rates of HIV infection among men who have sex with men are almost twice as high as the national average of 7.3%. Unlike other African countries that have aggressively sought to reach vulnerable populations with services and support and that are reporting declining rates of new infections, Uganda's HIV incidence is rising, triggering concern and criticism.

We urge all Ugandans to strongly oppose this bill and to let your Members of Parliament who are attempting to bring this legislation into law know that you do not support their actions. Human rights are human rights, however unpopular a group is, and we call upon all the concerned citizens to stand up for these rights. We urge all persons concerned with protecting our children from sexual abuse by predatory adults to insist on amendments to the Children's Act so that it can protect all Uganda's future generations.

Vote NO for the Anti-Homosexuality Bill and YES to Human Rights for all!

For further details: www.ugandans4rights.org





**Sexual Minorities Uganda
S M U G**

Kampala, Uganda
Telephone: +256 312 294 859
Email: info@sexualminoritiesuganda.org
Website: www.sexualminoritiesuganda.org

October 14, 2010

FOR IMMEDIATE RELEASE

KAMPALA - UGANDA

One Year since the introduction of the Anti-Homosexuality Bill – 2009

On October 14, 2009 the draft Anti Homosexuality Bill was introduced to the Parliament of Uganda by Ndoorwa West MP David Bahati. Mr Bahati's Anti-Homosexuality Bill stipulates the death penalty for repeated same-sex relations and life imprisonment for all other homosexual acts. A person in authority who fails to report an offender to the police within 24 hours will face 3 years in jail. Likewise, the promotion of homosexuality carries a sentence of 5 to 7 years in jail.

This Bill is an expression of prejudice, intolerance, discrimination and violence. The bill abuses the dignity, privacy and equality of people with a different sexual orientation and identity other than heterosexual. If passed into law, it will further legitimize public and private violence, harassment and torture.

It has promoted hate- speech in churches, schools and the media. It has led to defamation, blackmail, evictions, intimidation, arbitrary arrests and unlawful detention, physical assault, emotional and mental assault of LGBT activists, our families and allies.

The bill has further led to increased violence incited by local media, particularly The Red Pepper tabloid and recently launched Rolling Stone newspaper. The headline of the Rolling Stone viciously screamed "**100 pictures of Ugandan's top homos leak- Hang them**" in their Vol. 1 No. 05 October 02-09, 2010. They published pictures, names, residences and other details of LGBT activists and allies.

"When my neighbors saw my picture in the paper, they were furious. They threw stones at me while I was in my house. I was so terrified somehow I managed to flee my home to safety." said Stosh [Programme Coordinator- Kulhas Uganda]

Justice and Equality

“The sad truth is that most evil in Uganda is done by people who end up never being held accountable for their deeds. The Rolling Stone publication has incited violence against a group of minorities making them seem like less of HUMAN BEINGS” Gerald [Admin – SMUG].

The bill constitutes a violation of the right to freedom of privacy, association, assembly and security of the person as enshrined in Constitution of Uganda’s and International Human Rights Law.

The impact of such legal and social exclusion is being felt in the lives of LGBTI Ugandans. Sexual Minorities Uganda strongly condemns such laws and media witch-hunt of homosexuals.

We would like to acknowledge Human Rights institutions and activists, local, regional and international Civil Society, Development partners and friends around the world for the enormous support to the Uganda LGBTI community and request for your continued call to African governments to repeal the ‘sodomy laws’.

Contacts:

Frank Mugisha

fmugisha@sexualminoritiesuganda.org

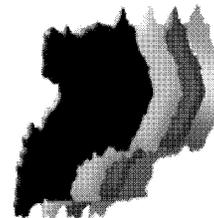
Pepe Julian Onziema

jpepe@sexualminoritiesuganda.org

Justice and Equality

African Women's
 Development Fund
 (AWDF)
 Akina Mama wa
 Afrika (AMWA)
 Advocates for Public
 International Law in
 Uganda (APILU)
 Centre for Domestic
 Violence Prevention
 (CEDOVIP)
 Centre for Women in
 Governance
 (CEWIGO)
 Development
 Network of
 Indigenous Voluntary
 Associations
 (DENIVA)
 East and Horn of
 Africa Human Rights
 Defenders Project
 (EHAHRDP)
 Forum for Women in
 Democracy
 (FOWODE)
 Human Rights
 Awareness &
 Promotion Forum
 (HRAPF)
 Human Rights and
 Peace Centre, Faculty
 of Law, Makerere
 University
 Integrity Uganda
 Mentoring and
 Empowerment
 Programme for
 Young Women
 (MEMPROW)
 National Association
 of Women
 Organisations in
 Uganda (NAWOU)
 National Coalition of
 women Living with
 HIV/AIDS
 (NACWOLA)
 Raising Voices,
 Refugee Law Project,
 Faculty of Law,
 Makerere University
 National Guidance
 and Empowerment
 Network of People
 Living with HIV/AIDS
 (NGEN+)
 Spectrum Uganda
 Support Initiatives
 for People with
 Atypical sexual
 Development (SIPD)
 Uganda
 Uganda Federation of
 Women lawyers
 (FIDA-U)
 Uganda Feminist
 Forum
 Uganda Health
 Science and Press
 Association (UHSPA)
 Women's
 Organisation &
 Network for Human
 Rights Advocacy
 (WONETHA)

Civil Society Coalition on Human Rights & Constitutional Law



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 Mob:+256 774 068 663
 Fax; +256-414-346491
 Email :ahbcoalition.coordinator@gmail.com
 Website; www.ugandans4rights.org

21/12/13

THE PASSING OF THE UGANDAN ANTI-HOMOSEXUALITY BILL 2013

INTERNATIONAL COMMUNITY RESPONSE GUIDELINES

Dear Partners, Friends and Allies,

Yesterday Friday 20th December 2013 the Ugandan parliament passed the long contested Anti-Homosexuality Bill after five long years of civil society efforts to obstruct its passing on human rights and constitutional grounds. The whole turn of events took everyone by surprise despite past vigilance with monitoring its progress in parliament.

Faced with this sudden turn of events, we are aware that there are many suggestions and plans as to what to do and in what way to respond on the part of our international partners and allies. The following are therefore substantive guideline points for international response on the passing of the Anti-Homosexuality Bill:

1. Aid cut as a possible punitive measure should be discussed with the government of Uganda behind closed diplomatic doors and out of the glare of the media and the public.
2. Our own stand on aid cut is that we do not support it because of the backlash that might occur on the LGBTI community and the suffering innocent Ugandans will have to endure as a result of the same but we also cannot influence the foreign policies of donor countries whose citizens demand that tax payers money not be sent to countries that do not respect human rights in general.

3. All our partners, local and international are free to issue statements. However please do cross check with us (CSCHRCL) that your facts are correct if you are not sure of them.
4. The CSCHRCL has not yet gotten a hold of the full text of the passed bill since parliament has gone into recess. However we shall follow this response guideline with our own copy which we have put together incorporating the original bill and the recommendations of the Legal and Parliamentary Affairs Committee of Parliament as well as records from parliament on yesterday's proceedings that led to the passing of the bill on the floor of parliament. This we shall use as a working document as we wait for the full text of the newly passed bill.

Geoffrey Ogwaro and Clare Byarugaba
Co-coordinators.

DOCUMENT FILED UNDER SEAL

PURSUANT TO

ORDER REGARDING CONFIDENTIALITY OF CERTAIN DISCOVERY MATERIAL

(Dkt. No. 106)

EXHIBIT I

EXHIBIT J

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

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

**DEFENDANT SCOTT LIVELY’S RESPONSES AND OBJECTIONS
TO PLAINTIFF’S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS**

Pursuant to Fed. R. Civ. P. 34 and Local Rules 26.5 and 34.1, Defendant Scott Lively (“Lively”) provides the following responses and objections to the First Request for Production of Documents propounded by Plaintiff Sexual Minorities Uganda (“SMUG”).

GENERAL OBJECTIONS

1) Lively objects to SMUG’s “Definitions” and “Instructions” to the extent they seek or purport to impose obligations greater than or inconsistent with the Federal Rules of Civil Procedure, the Local Rules of the United States District Court for the District of Massachusetts, or any discovery orders entered in this action. Lively responds pursuant to, and consistent with, the aforementioned authorities.

2) Lively objects to SMUG’s definition of “Defendant,” “you” and “your,” to the extent it purports to attribute conduct or documents to Lively in his individual capacity. Unless otherwise specifically and expressly stated, each and every conduct or document described in or produced with these responses and objections was undertaken, authored, received or transmitted by Lively, if at all, solely in his capacity as an officer of Abiding Truth Ministries (“ATM”).

3) Lively's investigation and development of all facts and circumstances relating to this action is ongoing. Lively will supplement these responses, objections and document production as new and additional information is discovered, and as required by applicable rules.

4) By providing these responses, objections and document production, Lively does not waive, and hereby expressly reserves, the right to assert any and all objections as to their admissibility into evidence in this action, or in any other proceedings, on any and all grounds including, but not limited to, competency, relevancy, materiality, and privilege. Further, Lively provides these responses, objections and document production without in any way implying that they are relevant or material to the subject matter of this action.

REQUESTS FOR PRODUCTION

1) All documents relating to your responsibilities and duties with or on behalf of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, Coalition for Family Values, or their affiliates and subsidiaries.

OBJECTION/RESPONSE: Lively objects to this request because it is vague, ambiguous and otherwise fails to identify the documents sought with reasonable specificity. Without waiving any objection, see documents related to the corporate governance of ATM, produced as LIVELY 2931 - 2971. Lively does not have any additional documents providing a job description within his custody, possession or control.

2) All documents relating to any fundraising you conducted on behalf of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, Coalition for Family Values, or their affiliates and subsidiaries, and any funds you received from these entities, including but not limited to all reports to the Internal Revenue Service or any state tax-reporting agency indicating monies and any other remuneration paid to or on behalf of you.

OBJECTION/RESPONSE: Lively objects to this request because it is overbroad, oppressive and unduly burdensome, and because it seeks documents which are neither relevant nor likely to lead to the discovery of admissible evidence. Lively further objects to this request to the extent it seeks the identity of individual members, donors or supporters of the listed entities, as it infringes on the First Amendment right of individuals to belong to and to support issue organizations anonymously. Without waiving any objection, ATM's Forms 990 filed with the Internal Revenue Service from 2002 to 2013 are produced as LIVELY 2972 - 3174. See also ATM's email alerts and newsletters, produced as LIVELY 2128 - 2930.

3) The articles of incorporation and by-laws, including any amendments thereto, of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, Coalition for Family Values, or their affiliates and subsidiaries.

RESPONSE: Documents related to the corporate governance of ATM are produced as LIVELY 2931 – 2971. Lively does not have in his custody, possession or control responsive documents for any of the other listed entities.

4) All documents relating to the governance of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, Coalition for Family Values, or their affiliates and subsidiaries, including documents identifying the officers and/or directors of those organizations and all minutes of meetings of the board of directors of those organizations.

OBJECTION/RESPONSE: To the extent this request seeks documents other than those sought in Request No. 3, or those specifically enumerated in this request, Lively objects on the ground that the request is vague, ambiguous and fails to identify the documents sought with reasonable specificity. To the extent this request seeks minutes of ATM board meetings where there was no discussion of Uganda, Lively objects on the ground that such request is overbroad, oppressive, not relevant or likely to lead to discovery of admissible evidence, and an invasion into the confidential and proprietary information of an organization not party to this suit.

Without waiving any objection, documents related to the corporate governance of ATM are produced as LIVELY 2931 – 2971. ATM’s officers and/or directors are identified in ATM’s governing documents (LIVELY 2931 – 2971), and in ATM’s Forms 990 (LIVELY 2972 – 3174). Minutes of ATM’s board of directors meetings where there was discussion of Uganda are produced as LIVELY 3175 - 3180. Lively does not have in his custody, possession or control any responsive documents for any of the other listed entities.

5) All documents relating to the relationship between and among any combination of the following: Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, and the Coalition for Family Values, and their affiliates and subsidiaries.

OBJECTION/RESPONSE: Lively objects to this request because it is vague, ambiguous and otherwise fails to identify the documents sought with reasonable specificity. Without waiving any objection, Lively does not have in his custody, possession or control any organizational chart or description of the entities’ relationship to each other.

6) All documents reflecting the identity of any persons in Uganda who served as an officer, director, employee, or agent of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, Coalition for Family Values, or their affiliates and subsidiaries, during the Relevant Date Range.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

7) All documents relating to any efforts by you, or any entity on whose behalf you were acting, taken in conjunction with any persons residing or working in Uganda, relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” the Anti-Homosexuality Bill, or the promotion “pro-family” values.

RESPONSE: See: writings and reports about Uganda (LIVELY 1507 – 1666); travel documents and communications about Uganda (LIVELY 3181 - 3499); and documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743). Documents describing Lively’s work in Uganda are also included in the scottlively.net files (LIVELY 1667 – 1915), and in ATM’s email alerts and newsletters (LIVELY 2128 – 2930).

8) All documents relating to your communications with Stephen Langa, Martin Ssempe, James Buturo, David Bahati, and/or Simon Lokodo, relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” the Anti-Homosexuality Bill, or the promotion of “pro-family” values.

RESPONSE: All responsive communications are produced within the documents and communications about Uganda (LIVELY 3181 - 3499) and documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743).

9) All documents relating to any financial transaction between, on the one hand, you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, and, on the other hand, Stephen Langa, Martin Ssempe, James Buturo, David Bahati, and/or Simon Lokodo, including all documents relating to the reason for the financial transaction.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

10) All documents relating to payments, reimbursements for expenses, logistical support, or scheduling efforts by you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, relating to the travel of Stephen Langa, Martin Ssempe, James Buturo, David Bahati, and/or Simon Lokodo to the United States.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

11) All documents relating to your communications with the following individuals relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” the Anti-Homosexuality Bill, or the promotion of “pro-family” values:

- a. employees and/or members of the Family Life Network in Uganda;
- b. employees and/or members of the Disciple Nations Alliance in Uganda;
- c. employees and/or members of the Ugandan National Parents Network;
- d. employees and/or members of the Uganda Coalition for Moral Values;
- e. employees and/or members of the Inter Faith, Culture and Family Coalition Against Homosexuality in Uganda;
- f. Kihumuro Apuuli;
- g. Fred Ruhindi;
- h. Kale Kayihura;
- i. Sydney Nsubuga Enoch;
- j. Paul Kagaba;
- k. George Oundo;
- l. Giles Muhame;
- m. the *Rolling Stone* tabloid in Uganda and/or its employees, reporters, writers, or contributors;
- n. the *Red Pepper* tabloid in Uganda and/or its employees, reporters, writers, or contributors;

- o. the *New Vision* newspaper in Uganda and/or its employees, reporters, writers, or contributors; or
- p. members of the Ugandan Parliament or Government.

RESPONSE: All responsive communications are produced within the documents and communications about Uganda (LIVELY 3181 - 3499) and documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743).

12) All documents relating to any financial transaction relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” the Anti-Homosexuality Bill, or the promotion of “pro-family” values between, on the one hand, you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, and, on the other hand:

- a. the Family Life Network in Uganda and its employees and members;
- b. the Disciple Nations Alliance in Uganda and its employees and members;
- c. the Ugandan National Parents Network and its employees and members;
- d. the Uganda Coalition for Moral Values and its employees and members;
- e. the Inter Faith, Culture and Family Coalition Against Homosexuality in Uganda and its employees and members;
- f. Kihumuro Apuuli;
- g. Fred Ruhindi;
- h. Kale Kayihura;
- i. Sydney Nsubuga Enoch;
- j. Paul Kagaba;
- k. George Oundo;
- l. Giles Muhame;

- m. the *Rolling Stone* tabloid in Uganda and its employees, reporters, writers, or contributors;
- n. the *Red Pepper* tabloid in Uganda and its employees, reporters, writers, or contributors;
- o. the *New Vision* newspaper in Uganda and its employees, reporters, writers, or contributors; or
- p. members of the Ugandan Parliament or Government and their families.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

13) All documents relating to payments, reimbursements for expenses, logistical support, or scheduling efforts by you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, relating to the travel of any Ugandan government official to the United States.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

14) All documents relating to your efforts in Uganda relating to the promotion of “pro-family” values, the purported harms and causes of homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” and methods for treating, addressing, countering, or eliminating homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” and the “gay movement.”

OBJECTION/RESPONSE: Lively objects to this request on the grounds that it is vague, ambiguous and fails to identify the documents sought with reasonable specificity. To the extent this request purports to require Lively to produce every document available to him regarding homosexuality and its harms, the “gay” agenda and movement, the methods of opposing the “gay” agenda and movement, and/or the promotion of homosexuality, Lively objects on the grounds that it is oppressive, overbroad and unduly burdensome.

Without waiving any objection, see: documents regarding the harms and dangers posed by homosexual behavior, pederasty, pathological behavior by homosexuals, harms to children and society posed by “gay marriage,” as well as causation, prevention and recovery from homosexuality (LIVELY 0001 – 1243); documents regarding methods for opposing the “gay” agenda and movement and dealing with the personal and societal harms caused by homosexual conduct (LIVELY 1244 – 1457); documents regarding homosexual promotion and recruitment

(LIVELY 1458 – 1506); writings and reports about Uganda (LIVELY 1507 – 1666); the contents of scottlively.net (LIVELY 1667 – 1915); documents regarding the “gay” agenda (LIVELY 1939 – 2127); ATM’s email alerts and newsletters (LIVELY 2128 – 2930); travel documents and communications about Uganda (LIVELY 3181 - 3499); documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743); and various comments and threats of violence directed to Lively, and his responses to same (LIVELY 3744 – 4048).

These topics are also discussed in *Redeeming the Rainbow; Defeating “Gay” Arguments with Simple Logic; Why and How to Defeat the Gay Movement; 7 Steps to Recruit-Proof Your Child; The Poisoned Stream; and The Pink Swastika*. These are copyrighted works and bound volumes, but they can be provided for inspection at a mutually convenient date.

15) All documents relating to any consultants – including but not limited to public relations, strategy, advocacy, media, communications, community outreach, legislative, policy, religious, or business consultants – engaged by you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” or the promotion of “pro-family” values in Uganda or relating to the Anti-Homosexuality Bill, including but not limited to all reports to the Internal Revenue Service or any state tax-reporting agency indicating money and any other remuneration paid to or on behalf of such consultants.

OBJECTION/RESPONSE: Lively objects to this request on the grounds that it is vague, ambiguous and fails to identify the documents sought with reasonable specificity. Without waiving any objection, Lively has no responsive documents in his custody, possession or control.

16) All documents relating to the sending of any books or pamphlets authored or co-authored, in whole or part, by you, whether in hard copy or electronic format, to Uganda from the United States.

RESPONSE: Any responsive documents are produced within the documents and communications about Uganda (LIVELY 3181 - 3499).

17) All documents relating to the Anti-Homosexuality Bill, including relating to the averment in Paragraph 161 of your Answer that you “reviewed and commented upon a draft of the Anti-Homosexuality Bill considered by the Ugandan Parliament” and that you “urge[d] departure from the bill’s proposed penalties.”

RESPONSE: See documents produced as LIVELY 3500 – 3743; LIVELY 1507 – 1666; and LIVELY 3744 – 4048.

18) All documents relating to any funds you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, provided to persons in Uganda for work, services, or consultation relating to the Anti-Homosexuality Bill, or other existing or proposed legislation in Uganda relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” anti-discrimination, or the promotion of “pro-family” values.

RESPONSE: Lively has no responsive documents in his custody, possession or control.

19) All documents relating to any existing or proposed legislation in Uganda, other than the Anti-Homosexuality Bill, relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” anti-discrimination, or the promotion of “pro-family” values, including statements or comments by you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries.

RESPONSE: Any responsive documents are produced within the documents and communications about Uganda (LIVELY 3194 - 3499), documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743), and writings and reports about Uganda (LIVELY 1507 – 1666).

20) All documents relating to the averment in your Answer to Paragraphs 61-63 of Plaintiff’s Amended Complaint that you are “generally opposed to the expansion of non-discrimination laws to include sexual preference, sexual conduct or transgender status” and that you have “shared [your] views and opinions publicly.”

OBJECTION/RESPONSE: To the extent this request purports to require Lively to produce every statement, speech, opinion or writing he has ever authored or given on the subject of opposing expansion of non-discrimination laws to include sexual preference, sexual conduct or transgender status, Lively objects on the grounds that it is oppressive, overbroad and unduly burdensome.

Without waiving any objection, Lively’s position on this issue is discussed extensively within the documents produced herewith, including in: *Redeeming the Rainbow*, pp. 101-105, “My Letter to the Slovenian People,” “My Letter to the Hungarian People,” “The Key to Pro-Family Victory If We Really Want It,” “Homo-Fascism v. the First Amendment,” “How to Save the Boy Scouts: The First Amendment Supremacy Clause,” “CHRISTIAN RED ALERT,” “Has the Worm Finally Turned,” “Report from Springfield MO,” “Time for Pro-Family Push-Back in 2014!,” “Harvard, Mother Jones and the ‘Gay’ Bullies,” “Pink Brick Award,” and “First Amendment Supremacy Clause Fact Sheet.”

21) All documents relating to any and all trips you made to Uganda, including but not limited to documents relating to the planning for the trips; all public and private meetings, conferences, and events you attended during those trips; all speeches or comments you made during such trips relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” the Anti-Homosexuality Bill, or the promotion of “pro-family” values; and any payments or reimbursements for expenses incurred by you or any other entity or individual for (i) your travel and stay in Uganda and (ii) any public or private meetings, conferences, or events that you attended in Uganda.

RESPONSE: See: documents and communications about Uganda (LIVELY 3181 - 3499), documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743), and writings and reports about Uganda (LIVELY 1507 – 1666). Lively also discussed his Uganda trips on the scottlively.net website (LIVELY 1667 – 1915), and in ATM’s email alerts and newsletters (LIVELY 2128 – 2930).

22) All documents relating to communications between you and/or between any combinations of the following individuals relating to the promotion of “pro-family” values, the purported harms and causes of homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” and methods for treating, addressing, countering, or eliminating homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” or the “gay movement”:

- a. Alexy Ledyae, associated with the New Generation Church and Watchmen on the Walls, Riga, Latvia;
- b. Don Schmierer, former board member of Exodus International;
- c. Caleb Brundidge, associated with International Healing Foundation;
- d. Ken Hutcherson, associated with Antioch Bible Church;
- e. Vlad Kusakin; or
- f. Vadim Privedenyuk.

OBJECTION/RESPONSE: To the extent this request seeks communications about homosexuality in countries other than Uganda, Lively objects on the ground that such communications are beyond the scope of this litigation and are neither relevant nor likely to lead to the discovery of admissible evidence. This lawsuit is brought solely by a Ugandan entity and is about Lively’s alleged activities in Uganda. Lively’s communications with individuals in other countries about homosexuality in those other countries have no relevance to Uganda.

Without waiving any objection, any communications with these individuals about Uganda are included within the documents and communications about Uganda (LIVELY 3194 - 3499).

23) All documents relating to any financial transaction between, on the one hand, you, Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, or their affiliates or subsidiaries, and, on the other hand,

- a. Alexy Ledyayev;
- b. New Generation Church in Riga, Latvia;
- c. Don Schmierer;
- d. Caleb Brundidge;
- e. Ken Hutcherson;
- f. Vlad Kusakin; or
- g. Vadim Privedenyuk,

relating to the promotion of “pro-family” values, the purported harms and causes of homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” or the “gay movement, and methods for treating, addressing, countering, or eliminating homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” or the “gay movement.”

OBJECTION/RESPONSE: To the extent this request seeks documents regarding financial transactions for work or ministry done in countries other than Uganda, Lively objects on the ground that such documents are beyond the scope of this litigation and are neither relevant nor likely to lead to the discovery of admissible evidence. This lawsuit is brought solely by a Ugandan entity and is about Lively’s alleged activities in Uganda. Financial transactions between the listed organizations and individuals for work or ministry in other countries have no relevance to Uganda.

Without waiving any objection, Lively has no responsive documents in his custody, possession or control.

24) All documents relating to any funds you, or any employee, agent, affiliate, or subsidiary of Abiding Truth Ministries, the Pro-Family Resource Center, DefendtheFamily.com, Defend the Family International, Watchmen on the Walls, or the Coalition for Family Values, provided to persons residing or working in Russia, Latvia, Lithuania, or Moldova relating to existing or proposed legislation in any of the aforementioned countries relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” anti-discrimination, or the promotion of “pro-family” values.

OBJECTION/RESPONSE: Lively objects to this request on the ground that it seeks documents beyond the scope of this litigation which are neither relevant nor likely to lead to the discovery of admissible evidence. This lawsuit is brought solely by a Ugandan entity and is about Lively’s alleged activities in Uganda. SMUG alleges no harm from legislation in other countries, and such legislation has no relevance to Uganda.

Without waiving any objection, Lively has no responsive documents in his custody, possession or control.

25) All documents relating to your efforts to assist in the introduction, passage, or defeat of legislation in Russia, Moldova, Latvia, Lithuania, Estonia, Poland, Belarus, Romania, and Ukraine relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” anti-discrimination, or the promotion of “pro-family” values, including but not limited to all documents relating to the basis of your statement to NBC News that you “influenced the Russian law” banning so-called homosexual propaganda.

OBJECTION: Lively objects to this request on the ground that it seeks documents beyond the scope of this litigation which are neither relevant nor likely to lead to the discovery of admissible evidence. This lawsuit is brought solely by a Ugandan entity and is about Lively’s alleged activities in Uganda. SMUG alleges no harm from legislation in other countries, and such legislation has no relevance to Uganda.

26) All documents you posted, or someone posted on your behalf, on the Internet relating to homosexuality, so-called homosexual behavior, the so-called promotion of homosexuality or homosexual behavior, the “gay agenda,” the “gay movement,” or the promotion of “pro-family” values.

OBJECTION/RESPONSE: Lively objects to this request on the ground that it is overbroad, oppressive, unduly burdensome, and fails to identify the documents sought with reasonable specificity. Lively has transmitted countless thousands of messages through the Internet on the listed topics. To the extent these documents are still posted on the Internet, they are equally available to SMUG.

Without waiving any objection, see www.scottlively.net and www.defendthefamily.com. See also LIVELY 1507 – 1666, LIVELY 1667 – 1915, LIVELY 2128 – 2685, LIVELY 3194 – 3499, LIVELY 3500 – 3743, and LIVELY 3744 – 4048.

27) All documents relating to drafts and editor notes for *Defend the Family: Activist Handbook* and *Redeeming the Rainbow*.

RESPONSE: Responsive documents regarding *Redeeming the Rainbow* are produced as LIVELY 4049 – 4188. Lively has no responsive documents regarding the *Activist Handbook* in his custody, possession or control.

28) All documents that identify any author or co-author of *The Pink Swastika: Homosexuality in the Nazi Party*, *The Poisoned Stream*, or *Redeeming the Rainbow*, as averred in Paragraph 24 of your Answer.

RESPONSE: The author(s) of the listed works is/are identified within the works themselves. These are copyrighted works and bound volumes, but they can be provided for inspection at a mutually convenient date.

29) All documents relating to your statements about the relationship or link between the Rwandan genocide and homosexuality or so-called homosexual behavior, including documents or sources providing the basis of such statements, for example, your statement in or around March 2009 in Kampala that “a mass murder, you know like...the Rwandan stuff, probably involved these guys,” including but not limited to the sources upon which you relied in making those statements.

OBJECTION/ RESPONSE: Lively objects to this request as vague and ambiguous to the extent that it seeks documents relating to any statement other than the one specifically identified therein. Without waiving any objection, see discussion on gender imbalance in *Redeeming the Rainbow*.

30) All documents relating to your statements in *Redeeming the Rainbow* about the “homosexual recruitment of children,” including but not limited to the sources upon which you relied in making those statements.

OBJECTION/RESPONSE: Lively objects to this request as vague and ambiguous, because it fails to identify with reasonable specificity the statements as to which documents are sought. Lively cannot provide a complete response without a specific listing of the alleged statements in question. Moreover, to the extent this request purports to require Lively to produce every document he has ever read regarding homosexual recruitment, Lively objects on the ground that the request is overbroad, oppressive and unduly burdensome.

Without waiving any objection, see LIVELY 0125 – 0419, LIVELY 1191 – 1243, LIVELY 1458 – 1506, LIVELY 1507 – 1666, and LIVELY 1667 – 1915. See also *Redeeming the Rainbow*, *The Pink Swastika*, *7 Steps to Recruit-Proof Your Child*, “Satan Wins Back the Scouts,” “The Danger of ‘Safe Schools,’” and “Youth Suicide Used a ‘Gay’ Recruitment Strategy.”

31) All documents relating to your statements in your lecture at the “Seminar on Exposing the Homosexual Agenda” in Uganda in March 2009 connecting homosexuality or so-called homosexual behavior with child abuse, including but not limited to the sources upon which you relied in making those statements.

OBJECTION/RESPONSE: Lively objects to this request as vague and ambiguous, because it fails to identify with reasonable specificity the verbal statements as to which documents are sought. Lively cannot provide a complete response without a specific listing of the alleged statements in question. Moreover, to the extent this request purports to require Lively to produce every document he has ever read regarding the connections between homosexuality and child abuse, Lively objects on the ground that the request is overbroad, oppressive and unduly burdensome.

Without waiving any objection, see documents referenced in response to Request No. 30. Specifically within those documents, see also: *The Pink Swastika*, “Report from Uganda,” “The Death Penalty in Uganda,” “Satan Wins Back the Scouts,” “Pink Brick Award,” “My Comments on the Passage of the Uganda Anti-Homosexuality Law,” “Am I Nuts, or is Crazyiness Spreading?,” “Schoolchildren to Drink ‘Gay’ Koolaid in October,” and “Hey SPLC, Take Me OFF Your Hate, I Mean Hit List!”

32) All documents relating to your statements on *Roadkill Radio* in or around May 2012 about conversion therapy, including but not limited to the sources upon which you relied in making those statements.

OBJECTION/RESPONSE: Lively objects to this request as vague and ambiguous, because it fails to identify with reasonable specificity the verbal statements as to which documents are sought. Lively cannot provide a complete response without a specific listing of the alleged statements in question. Without waiving any objection, to the extent this request seeks documents regarding Lively’s proposal for voluntary therapy as a sentencing alternative to ameliorate the harshness of the proposed Anti-Homosexuality Bill in Uganda, see LIVELY 3500 – 3743.

33) All documents relating to your statements in *Defend the Family: Activist Handbook* that the “gay movement” is a “highly organized army of social engineers,” including but not limited to the sources upon which you relied in making those statements.

OBJECTION/RESPONSE: Lively objects to this request as vague and ambiguous, to the extent it seeks documents relating to any statement other than the one specifically identified therein. Without waiving any objection, see documents regarding the “gay” agenda, produced as LIVELY 1939 – 2127.

34) All documents relating to Paragraph 10 of your Answer in which you aver, “David Kato is now dead because he was killed by a homosexual prostitute whom Kato hired for sexual services but refused to pay,” including but not limited to the sources upon which you relied in making that answer.

RESPONSE: See media reports of Mr. Kato’s murder, the investigation that followed, and the punishment of the person responsible for the murder, produced as LIVELY 1916 – 1938. Lively’s discovery and investigation into Mr. Kato’s murder continue. Lively will supplement this response as required by the Rules of Civil Procedure and the Court’s scheduling orders.

35) All documents relating to the sources on which you rely for Paragraph 22 of your Answer in which you aver, “[T]o the extent any of the acts, omissions or conduct alleged throughout this Complaint were actually undertaken by [you], they were undertaken solely in [your] capacity as an officer of Abiding Truth Ministries, a bona-fide corporation, and, as such [you] cannot be held individually liable for said acts, omissions or conduct.”

RESPONSE: See ATM’s governing documents (LIVELY 2931 – 2971); ATM’s board meeting minutes (LIVELY 3175 – 3180); writings and reports about Uganda (LIVELY 1507 – 1666); ATM’s email alerts and newsletters (LIVELY 2128 – 2930); travel documents and communications about Uganda (LIVELY 3181 - 3499); and documents regarding the Anti-Homosexuality Bill (LIVELY 3500 – 3743).

36) All documents relating to your sources of income and assets.

OBJECTION: Lively objects to this request on the ground that it is calculated to oppress and harass, and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. This request is appropriate for post-judgment, not pre-judgment, proceedings. The request is also vague and ambiguous because it fails to identify the documents sought with reasonable specificity.

37) All documents relating to the cost of publication and distribution of, and royalties paid in connection with, *Defend the Family: Activist Handbook*, *Redeeming the Rainbow*, *The Pink Swastika: Homosexuality in the Nazi Party*, and *The Poisoned Stream*.

OBJECTION/RESPONSE: Lively objects to this request on the ground that it is calculated to oppress and harass, and seeks information that is neither relevant nor likely to lead to the discovery of admissible evidence. SMUG is admittedly not suing Lively for any of his books and writings regarding homosexuality, thus the documents sought bear no relevance to SMUG’s claims. The request is also vague and ambiguous because it fails to identify the documents sought with reasonable specificity.

Without waiving any objection, see ATM’s Form 990 filed with the Internal Revenue Service for the years 2002 – 2013 (LIVELY 2972 – 3174).

38) All documents relating to any insurance policy(ies) in the name of Abiding Truth Ministries covering the acts, omissions, or conduct of its officers and employees, including you.

OBJECTION/RESPONSE: Lively has no insurance policy in his custody, possession or control that covers the acts, omissions or conducts alleged in this lawsuit. To the extent this request purports to require other policies, Lively objects on grounds of relevance.

39) All documents relating to Sexual Minorities Uganda, East and Horn of Africa Human Rights Defenders Project, Freedom and Roam Uganda, Frank Mugisha, Victor Mukasa, Kasha Jacqueline Nabagasera, Pepe Onziema, Val Kalende, Gaetano Kaggwa, David Kato, Yvonne Oyo, Dr. Hilda Tadria, Richard Lusimbo, or Kapya Kaoma.

OBJECTION: Lively objects to this request as vague and ambiguous, because it fails to identify with reasonable specificity the documents sought about the listed organizations and individuals. To the extent the request seeks every single document available to Lively relating to the listed organizations and individuals, Lively objects on the grounds that the request is overbroad, oppressive and unduly burdensome. There are countless thousands of responsive documents publicly available to Lively. In this litigation alone there have been thousands of pages filed or exchanged between the parties regarding just one of the listed entities. Lively cannot even begin to formulate a proper response without some limiting factors.

40) All documents identified or relied on in your responses to Plaintiff's First Set of Interrogatories to Defendant Scott Lively in this Lawsuit.

RESPONSE: See documents identified in the responses to the referenced interrogatories, and produced herein.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and correct copy of the foregoing was served via electronic mail this 12th day of June, 2014, upon:

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/s/ Horatio G. Mihet
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