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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES – CENTRAL DISTRICT

DAVID COPPEDGE,

Plaintiff,

vs.

JET PROPULSION LABORATORY; CALIFORNIA INSTITUTE OF TECHNOLOGY, et al.,

Defendant.

CASE NO. BC 435600

DEFENDANT CALIFORNIA INSTITUTE OF TECHNOLOGY'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S DEMAND FOR INSPECTION AND COPYING OF DOCUMENTS, TANGIBLE THINGS AND ELECTRONICALLY STORED INFORMATION (SET ONE)

PROPOUNDING PARTY: PLAINTIFF DAVID COPPEDGE

RESPONDING PARTY: DEFENDANT CALIFORNIA INSTITUTE OF TECHNOLOGY

SET NO.: ONE

TO PLAINTIFF DAVID COPPEDGE, AND TO HIS ATTORNEY OF RECORD, WILLIAM J. BECKER, JR., ESQ., THE BECKER LAW FIRM:

Defendant CALIFORNIA INSTITUTE OF TECHNOLOGY ("Defendant") hereby answers, objects, and otherwise responds to Plaintiff's First Demand for Inspection and Copying of Documents, Tangible Things and Electronically Stored Information as follows:

DEFENDANT'S PRELIMINARY STATEMENT

1. Defendant has not completed its investigation relating to this action, has not completed discovery in this action, and has not completed preparation for trial. As discovery proceeds, facts, information, evidence, documents and things may be discovered that are not set forth in these responses, but which may have been responsive to Plaintiff's Request. The following responses are based on Defendant's knowledge, information and belief at this time and are complete as to Defendant's best knowledge at this time. Defendant assumes no obligation to voluntarily supplement or amend these responses to reflect information, evidence, documents or things discovered following service of these responses. Furthermore, these responses were prepared based on Defendant's good faith interpretation and understanding of the individual Requests and are subject to correction for inadvertent errors or omissions, if any. These responses are given without prejudice to subsequent revision or supplementation based upon any information, evidence and documentation that hereinafter may be discovered. Defendant reserves the right to refer to, to conduct discovery with reference to, or to offer into evidence at the time of trial, any and all facts, evidence, documents and things developed during the course of discovery and trial preparation, notwithstanding the reference to facts, evidence, documents and things in these responses.

2. To the extent that any Request seeks documents that are also sought by or identified pursuant to any other Request, Defendant declines to produce or identify multiple

copies of such documents, and states that each document produced or identified pursuant to any Request is also produced pursuant to every other Request to which it is or may be responsive.

3. To the extent that any Request seeks documents that have already been produced, or which have been identified as exhibits to any depositions in this action, Defendant declines to produce or identify such documents.

4. To the extent that any Request seeks documents that are protected by the attorney-client privilege and/or attorney work product doctrine, or any other applicable privilege or immunity, Defendant declines to produce such documents, which would include and would not be limited to:

(a) All documents that constitute or record correspondence or other communications between counsel for Defendant or its agents or employees and Defendant or its agents or employees regarding this action;

(b) All documents prepared for use in this litigation including notes, memoranda, draft pleadings and correspondence prepared by, at the direction of, or for review by counsel for Defendant; and

(c) All documents that constitute or record correspondence or other communications between Defendant and counsel for Defendant regarding this action.

DEFENDANT'S GENERAL OBJECTIONS TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

1. Defendant objects to Plaintiff's definition of the terms "YOU" and "YOUR" as vague, ambiguous, overbroad, and not reasonably tailored to lead to the discovery of admissible evidence.

2. Defendant objects to Plaintiff's Requests to the extent they seek documents created or relating to events prior to the date on which Defendant hired Plaintiff.

3. Defendant objects to Plaintiff's Request in its entirety to the extent that it seeks documents that are not relevant to the subject matter of this litigation and are not reasonably calculated to lead to the discovery of admissible evidence.

4. Defendant objects to Plaintiff's Request in its entirety to the extent that it calls for the production of documents that are protected from disclosure by the attorney-client privilege and/or work product doctrine, and/or any other applicable privilege or immunity.

5. Defendant objects to Plaintiff's Request in its entirety to the extent that it is overly broad and requires Defendant to make an unreasonable and unduly burdensome investigation.

6. Defendant objects to Plaintiff's Request in its entirety to the extent that it seeks documents, the disclosure of which would constitute an unwarranted invasion of the affected persons' constitutional, statutory and/or common-law rights of privacy and confidentiality.

7. Defendant objects to this Request in its entirety to the extent that it seeks private, privileged, or confidential commercial, financial, and/or proprietary business information.

All General Objections are incorporated by reference into each Response as though set forth in full therein.

DEFENDANT'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S REQUEST FOR PRODUCTION OF DOCUMENTS

DOCUMENT REQUEST NO. 1:

All DOCUMENTS and WRITINGS contained in PLAINTIFF's personnel file.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 1:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant hereby produces Plaintiff's Section file, which is Bates-stamped D000000001-59.

DOCUMENT REQUEST NO. 2:

All DOCUMENTS and WRITINGS that YOU provided to PLAINTIFF RELATING TO the following matters: status of employment, rights, duties, compensation, and benefits.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 2:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "status of employment," "rights," and "duties." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that it is hereby producing Plaintiff's Section file in response to Request No. 1.

DOCUMENT REQUEST NO. 3:

All employment manuals, and all updates, that YOU provided to PLAINTIFF since 2008.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 3:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "employment manuals" and "updates." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant hereby produces its Discipline Policy, Unlawful Harassment Policy, Nondiscrimination and Equal Employment Opportunity Policy, and Ethics and Business Conduct Policy, Problem Resolution Policy, as well as its Ethics Handbook.

DOCUMENT REQUEST NO. 4:

All DOCUMENTS and WRITINGS RELATING TO YOUR practices and policies for hiring and/or firing of employees since 2008.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 4:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "practices and policies for hiring and/or firing." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant not will produce documents in response to this Request.

DOCUMENT REQUEST NO. 5:

All DOCUMENTS and WRITINGS RELATING TO YOUR practices and policies for handling disciplinary matters with employees since 2008.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 5:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "practices and policies for handling disciplinary matters with employees." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that it is already producing its Discipline Policy in response to Request No. 3.

DOCUMENT REQUEST NO. 6:

All DOCUMENTS and WRITINGS RELATING TO any formal or informal complaints, civil or administrative complaints, inquiries, and/or comments from any of YOUR employees, or third party, concerning PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 6:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "civil or administrative complaints," "inquiries," and "comments." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in responsive to Request Nos. 11 and 12 are responsive to this Request. Defendant further responds that Plaintiff's notebooks, which Plaintiff produced to Defendant in the course of this litigation, are also responsive to this Request. In addition, Defendant hereby produces documents Bates-stamped D000000213-219, which are email communications regarding Plaintiff's work performance (including his communications and interactions with customers).

DOCUMENT REQUEST NO. 7:

All DOCUMENTS and WRITINGS RELATING TO any formal or informal complaints, civil or administrative complaints, inquiries, and/or comments from any of YOUR employees, or third party, concerning PLAINTIFF's interest in intelligent design.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 7:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "civil or administrative complaints," "inquiries," "comments," and "PLAINTIFF's interest in intelligent design." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request No. 6 are responsive to this Request.

DOCUMENT REQUEST NO. 8:

All DOCUMENTS and WRITINGS RELATING TO any formal or informal complaints, civil or administrative complaints, inquiries, and/or comments from any of YOUR employees, or third party, concerning PLAINTIFF's interest in religion.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 8:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "civil or administrative complaints," "inquiries," "comments," and "PLAINTIFF's interest in religion." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request No. 6 are responsive to this Request.

DOCUMENT REQUEST NO. 9:

All DOCUMENTS and WRITINGS RELATING TO any formal or informal complaints, civil or administrative complaints, inquiries, and/or comments from any of YOUR employees, or third party, concerning PLAINTIFF's interest in political issues.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 9:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "civil or administrative complaints," "inquiries," "comments," and "PLAINTIFF's interest in political issues." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request No. 6 are responsive to this Request.

DOCUMENT REQUEST NO. 10:

All DOCUMENTS and WRITINGS RELATING TO any formal or informal complaints, civil or administrative complaints, inquiries, and/or comments from any of YOUR employees, or third party, concerning Darwin's theory of evolution.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 10:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "civil or administrative complaints," "inquiries," and "comments." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope, particularly given that the Request does not relate in any way to Plaintiff. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it will not produce documents in response to this Request.

DOCUMENT REQUEST NO. 11:

All DOCUMENTS and WRITINGS constituting the record of an investigation conducted in 2009 by Jhertaune Huntley concerning PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 11:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant hereby produces documents Bates-stamped D000000060-109, which constitutes the Employee Relations file maintained by Jhertaune Huntley relating to Defendant's investigation of Plaintiff in Spring 2009.

DOCUMENT REQUEST NO. 12:

All DOCUMENTS and WRITINGS constituting the record of an investigation(s) conducted in 2009 by Karen Saidiner and/or the Employee Relations Office concerning PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 12:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant hereby produces documents Bates-stamped D000000110-137, which constitutes the Employee Relations file maintained by Karen Saidiner relating to Defendant's investigation of Plaintiff in Spring 2009.

DOCUMENT REQUEST NO. 13:

All DOCUMENTS and WRITINGS constituting the record of all investigations conducted by YOU in 2009 and 2010 concerning PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 13:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "all investigations."

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 14:

All DOCUMENTS and WRITINGS constituting reports prepared concerning allegations that PLAINTIFF was engaged in harassing co-workers in 2009.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 14:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 15:

All DOCUMENTS and WRITINGS RELATING TO the administrative protocol or procedures conducted in response to complaints or comments by YOUR employees concerning PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 15:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "the administrative protocol or procedures conducted." Defendant further objects that this Request is unintelligible as written. Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Based upon its foregoing objections, Defendant cannot respond to this Request as drafted.

DOCUMENT REQUEST NO. 16:

All DOCUMENTS and WRITINGS RELATING TO CHIN'S response to, reaction to or impressions concerning PLAINTIFF's interest in religion.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 16:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "response," "reaction," "impressions concerning," and "PLAINTIFF's interest in religion." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request as applying to the fact of Plaintiff's stated interest in religion, Defendant responds that it has not located any documents responsive to this Request.

DOCUMENT REQUEST NO. 17:

All DOCUMENTS and WRITINGS RELATING TO CHIN'S response to, reaction to or impressions concerning PLAINTIFF's interest in politics.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 17:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "response," "reaction," "impressions concerning," and "PLAINTIFF's interest in politics." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request as applying to the fact of Plaintiff's stated interest in politics, Defendant responds that it has not located any documents responsive to this Request.

DOCUMENT REQUEST NO. 18:

All DOCUMENTS and WRITINGS RELATING TO CHIN'S response to, reaction to or impressions concerning PLAINTIFF's interest in intelligent design.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 18:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "response," "reaction," "impressions concerning," and "PLAINTIFF's interest in intelligent design." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request as applying to the fact of Plaintiff's stated interest in intelligent design, Defendant responds that it has not located any documents responsive to this Request.

DOCUMENT REQUEST NO. 19:

All DOCUMENTS and WRITINGS RELATING TO removing PLAINTIFF as Cassini Systems Administration Team Lead.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 19:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request as requesting documents reflecting the reasons for Defendant's decision that Plaintiff would no longer perform lead activities for the systems administrators group, Defendant responds that is hereby producing non-privileged documents that are responsive to this Request.

DOCUMENT REQUEST NO. 20:

All DOCUMENTS and WRITINGS RELATING TO demoting PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 20:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "demoting." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that Plaintiff was not demoted and therefore no such documents exist.

DOCUMENT REQUEST NO. 21:

All DOCUMENTS and WRITINGS RELATING TO terminating PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 21:

Defendant objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that it has not located any documents responsive to this Request.

DOCUMENT REQUEST NO. 22:

All DOCUMENTS and WRITINGS identifying YOUR Unlawful Harassment Policy between 2008 and 2010.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 22:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "identifying." Defendant further objects to this Request on the grounds that it is overly broad as to scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request to the extent it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant hereby produces its Unlawful Harassment Policy.

DOCUMENT REQUEST NO. 23:

All DOCUMENTS and WRITINGS identifying YOUR Ethics and Business Conduct Policy between 2008 and 2010.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 23:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "identifying." Defendant further objects to this Request to the extent it is overly broad as to scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant hereby produces its Ethics and Business Conduct Policy.

DOCUMENT REQUEST NO. 24:

All DOCUMENTS and WRITINGS identifying YOUR discrimination policy between 2008 and 2010.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 24:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "identifying." Defendant further objects to this Request to the extent it is overly broad as to scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request on the grounds that it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant hereby produced its Nondiscrimination and Equal Employment Opportunity Policy.

DOCUMENT REQUEST NO. 25:

All DOCUMENTS and WRITINGS identifying YOUR diversity training policy between 2008 and 2010.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 25:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "identifying" and "diversity training policy." Defendant further objects to this Request on the grounds that it is overly broad as scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive. Defendant further objects to this Request to the extent it seeks information that is not relevant to the subject matter of this litigation and is not reasonably calculated to lead to the discovery of admissible evidence.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that no such written policy exists.

DOCUMENT REQUEST NO. 26:

The "short note" given to Human Resources by CHIN stating that there were allegations made against PLAINTIFF of a hostile work environment.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 26:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "short note."

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that no responsive documents have been located.

DOCUMENT REQUEST NO. 27:

All DOCUMENTS and WRITINGS supporting the contention, as stated the Seventh Affirmative Defense to YOUR Answer to the First Amended Complaint, that PLAINTIFF failed to exhaust his administrative remedies, the allegations in the Complaint fall outside the scope of any administrative charges PLAINTIFF filed and/or PLAINTIFF otherwise

failed to comply with the statutory prerequisites to the bringing of this action, pursuant to the FEHA, California Government Code section 12900 *et seq.*

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 27:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant refers Plaintiff to his production of documents relating to the charges he filed with the Department of Fair Employment and Housing.

DOCUMENT REQUEST NO. 28:

All DOCUMENTS and WRITINGS supporting the contention, as stated the Eighth Affirmative Defense to your Answer to the First Amended Complaint, that The Complaint, and each of its causes of action, is barred because Defendants are unable to reasonably accommodate PLAINTIFF's alleged religious beliefs and/or practices without undue hardship.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 28:

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that it has not located documents responsive to this Request. Defendant's investigation is continuing.

DOCUMENT REQUEST NO. 29:

All DOCUMENTS and WRITINGS supporting the contention, as stated the Tenth Affirmative Defense to YOUR Answer to the First Amended Complaint, that the Complaint, and each of its Causes of Action, is barred because PLAINTIFF did not satisfy and/or breached his statutory obligations as provided in the California Labor Code including, but not limited to, sections 2854 and 2856-2859.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 29:

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request No. 1 are responsive to this Request.

DOCUMENT REQUEST NO. 30:

All e-mail messages between and/or among CHIN, BURGESS, KLENK, Jhertaune Huntley and/or Karen Saidiner concerning allegations of harassment against PLAINTIFF.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 30:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "allegations of harassment." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant is hereby producing non-privileged documents responsive to this Request.

DOCUMENT REQUEST NO. 31:

All DOCUMENTS and WRITINGS supporting YOUR contention that PLAINTIFF's actions were "unwelcome and disruptive."

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 31:

Defendant objects to this Request on the grounds that it is vague and ambiguous as to "actions." Defendant further objects to this Request on the grounds that it is overly broad as to time and scope. Defendant further objects to this Request on the grounds that it is unduly burdensome and oppressive.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 6, 11, and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 32:

All DOCUMENTS and WRITINGS supporting YOUR contention that PLAINTIFF violated YOUR harassment policy.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 32:

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 33:

All DOCUMENTS and WRITINGS supporting YOUR contention that PLAINTIFF violated YOUR ethics policy.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 33:

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 3, 6, 11, and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 34:

All DOCUMENTS and WRITINGS supporting YOUR contention that PLAINTIFF violated YOUR discrimination policy.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 34:

Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant responds that no such documents exist.

DOCUMENT REQUEST NO. 35:

All DOCUMENTS and WRITINGS RELATING TO YOUR contention that PLAINTIFF continued to discuss politics or religion with his co-workers while in the office after being instructed not to do so.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 35:

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 36:

All DOCUMENTS and WRITINGS RELATING TO YOUR First Affirmative defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 36:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 37:

All DOCUMENTS and WRITINGS RELATING TO YOUR Second Affirmative defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 37:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 38:

All DOCUMENTS and WRITINGS RELATING TO YOUR Third Affirmative defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 38:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 39:

All DOCUMENTS and WRITINGS RELATING TO YOUR Fourth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 39:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 40:

All DOCUMENTS and WRITINGS RELATING TO YOUR Fifth Affirmative defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 40:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further

objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 41:

All DOCUMENTS and WRITINGS RELATING TO YOUR Sixth Affirmative defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 41:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1 and 6 are responsive to this Request.

DOCUMENT REQUEST NO. 42:

All DOCUMENTS and WRITINGS RELATING TO YOUR Seventh Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 42:

Defendant objects to this Request on the grounds that it is duplicative of Request No. 27. Subject to and without in any way waiving its general objections, and to the extent it understands this Request, Defendant refers Plaintiff to his Production of Documents relating to the charges he filed with the Department of Fair Employment and Housing.

DOCUMENT REQUEST NO. 43:

All DOCUMENTS and WRITINGS RELATING TO YOUR Eighth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 43:

Defendant objects to this Request on the grounds that it is duplicative of Request No. 28. Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that it has not located documents responsive to this Request. Defendant's investigation is continuing.

DOCUMENT REQUEST NO. 44:

All DOCUMENTS and WRITINGS RELATING TO YOUR Ninth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 44:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 45:

All DOCUMENTS and WRITINGS RELATING TO YOUR Tenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 45:

Defendant objects to this Request on the grounds that it is duplicative of Request No. 29. Subject to and without in any way waiving the foregoing objections, and to the extent it

understands this Request, Defendant responds that documents produced in response to Request No. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 46:

All DOCUMENTS and WRITINGS RELATING TO YOUR Eleventh Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 46:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 47:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twelfth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 47:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 48:

All DOCUMENTS and WRITINGS RELATING TO YOUR Thirteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 48:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 49:

All DOCUMENTS and WRITINGS RELATING TO YOUR Fourteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 49:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 50:

All DOCUMENTS and WRITINGS RELATING TO YOUR Fifteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 50:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 51:

All DOCUMENTS and WRITINGS RELATING TO YOUR Sixteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 51:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request No. 1 are responsive to this Request.

DOCUMENT REQUEST NO. 52:

All DOCUMENTS and WRITINGS RELATING TO YOUR Seventeenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 52:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further

objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 53:

All DOCUMENTS and WRITINGS RELATING TO YOUR Eighteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 53:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 54:

All DOCUMENTS and WRITINGS RELATING TO YOUR Nineteenth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 54:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that this information is within Plaintiff's possession, custody, and control. Discovery is ongoing.

DOCUMENT REQUEST NO. 55:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twentieth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 55:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 56:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-First Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 56:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention." Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 57:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Second Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 57:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention." Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 58:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Third Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 58:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention." Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 59:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Fourth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 59:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further

objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 60:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Fifth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 60:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention." Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 61:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Sixth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 61:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad in that it seeks documents to support a legal contention." Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Based upon the foregoing objections, and to the extent it understands this Request, Defendant responds that it cannot respond to this Request as phrased.

DOCUMENT REQUEST NO. 62:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Seventh Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 62:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 63:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Eighth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 63:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DOCUMENT REQUEST NO. 64:

All DOCUMENTS and WRITINGS RELATING TO YOUR Twenty-Ninth Affirmative Defense.

OBJECTIONS AND RESPONSE TO DOCUMENT REQUEST NO. 64:

Defendant objects to this Request on the grounds that it is vague, ambiguous, and overbroad to the extent it seeks documents to support a legal contention. Defendant further objects to this Request to the extent that it seeks information protected by the attorney-client privilege and/or attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, and to the extent it understands this Request, Defendant responds that documents produced in response to Request Nos. 1, 3, 6, 11 and 12 are responsive to this Request.

DATED: October 27, 2010

PAUL, HASTINGS, JANOFSKY & WALKER LLP
JAMES A. ZAPP
CAMERON W. FOX

By: _____
CAMERON W. FOX

Attorneys for Defendants
CALIFORNIA INSTITUTE OF TECHNOLOGY, GREGORY CHIN, CLARK A. BURGESS, KEVIN KLENK

(AS TO OBJECTIONS ONLY)

PROOF OF SERVICE

STATE OF CALIFORNIA)
) ss:
CITY OF LOS ANGELES AND COUNTY OF LOS ANGELES)

I am employed in the City of Los Angeles and County of Los Angeles, State of California. I am over the age of 18, and not a party to the within action. My business address is as follows: 515 So. Flower Street, 25th Floor, Los Angeles, CA 90071.

On October 27, 2010, I served the foregoing document(s) described as:

DEFENDANT CALIFORNIA INSTITUTE OF TECHNOLOGY'S OBJECTIONS AND RESPONSES TO PLAINTIFF'S DEMAND FOR INSPECTION AND COPYING OF DOCUMENTS, TANGIBLE THINGS AND ELECTRONICALLY STORED INFORMATION (SET ONE)

on the interested parties by placing a true and correct copy thereof in a sealed envelope(s) addressed as follows:

William J. Becker, Jr., Esq.
THE BECKER LAW FIRM
11500 Olympic Blvd, Suite 400
Los Angeles, CA 90064

Attorney for Plaintiff
DAVID COPPEDGE

☒ **VIA U.S. MAIL:**

I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice such sealed envelope(s) would be deposited with the U.S. postal service on October 27, 2010 with postage thereon fully prepaid, at Los Angeles, California.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and was executed on October 27, 2010, at Los Angeles, California.

Christine Wilson
Type or Print Name

Christine Wilson
Signature