



Respectfully submitted,

JACKSON WALKER LLP

By: /s/ Joel R. Glover

Charles L. Babcock

Texas State Bar No. 01479500

cbabcock@jw.com

Joel R. Glover

Texas State Bar No. 24087593

jglover@jw.com

Javier Gonzalez

Texas State Bar No. 24119697

jgonzalez@jw.com

1401 McKinney Street, Suite 1900

Houston, Texas 77010

(713) 752-4200 – Phone

(713) 752-4221 – Fax

Matt Dow

Texas State Bar No. 06066500

mdow@jw.com

Adam W. Aston

Texas State Bar No. 24045423

aaston@jw.com

100 Congress Ave., Suite 1100

Austin, Texas 78701

(512) 236-2056 – Phone

(512) 691-4456 – Fax

ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on January 19, 2024, I caused a copy of these requests to be served on counsel of record in compliance with the Federal Rules of Civil Procedure.

/s/ Joel R. Glover

Joel R. Glover

**AMENDED OBJECTIONS AND RESPONSE TO  
INTERROGATORY NO. 9**

**INTERROGATORY NO. 9:** Please identify all participants in the text-message conversations produced as UT-LOWERY-000005, UT-LOWERY-005269, and UT-LOWERY-005270, including specifying the date of the conversations and indicating which conversations the identified individuals participated in.

**OBJECTION:** Defendants object to this interrogatory because it is vague and ambiguous to the extent Plaintiff seeks an “indica[tion of] which conversations the identified individuals participated in.” It is not clear what information the Plaintiff seeks by use of that phrase.

**ANSWER:** Subject to the foregoing objection, see the table below.

Document	Participants	Date
UT-LOWERY-000005	Ethan Burris, Caitlin Mullaney	August 5, 2022
UT-LOWERY-005269	Lillian Mills Meeta Kothare	August 23, 2022
UT-LOWERY-005270	Richard Flores Jay Hartzell	June 8, 2022

**VERIFICATION**

I, Lillian Mills, hereby declare as follows:

1. My name is Lillian Mills. I am the Dean of the McCombs School of Business at the University of Texas at Austin (the “University”). I am duly authorized to make this declaration in my official capacity.

2. I have read the amended answer to Interrogatory No. 9 contained in Defendants’ Amended Objections and Response to Plaintiff’s Third Set of Interrogatories, and I am familiar with its contents.

3. I verify under penalty of perjury that the facts stated therein are true and correct to the best of my knowledge and based on information obtained from the records or representatives of the University.

4. I reserve the right to make any changes in the aforesaid answers if it should appear at any time that omissions or errors have been made or that additional or more accurate information has been obtained.

Executed on 2024-01-16 | 10:11:53 PST.

DocuSigned by:  
*Lillian Mills*  
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LILLIAN MILLS, in her official capacity as  
Dean of the McCombs School of Business at  
the University of Texas at Austin