

**Exhibit A**

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

RICHARD LOWERY

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PLAINTIFF,

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v.

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Case No. 1:23-CV-00129-LY

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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; ETHAN BURRIS, in his official capacity as Senior Associate Dean for Academic Affairs of the McCombs School of Business at the University of Texas-Austin; and CLEMENS SIJALM, in his official capacity as Finance Department Chair for the McCombs School of Business at the University of Texas-Austin,

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DEFENDANTS.

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**DEFENDANTS' OBJECTIONS AND RESPONSES TO PLAINTIFF'S  
FOURTH REQUESTS FOR PRODUCTION AND INTERROGATORIES**

TO: Plaintiff Richard Lowery, by and through his attorneys of record, Endel Kolde, Institute for Free Speech, 1150 Connecticut Ave., NW, Suite 801, Washington, D.C. 20036.

Defendants Lillian Mills, in her official capacity as Dean of the McCombs School of Business at the University of Texas at Austin; Ethan Burris, in his official capacity as Senior Associate Dean for Academic Affairs of the McCombs School of Business at the University of Texas at Austin; and Clemens Sialm, in his official capacity as Finance Department Chair for the McCombs School of Business at the University of Texas at Austin (collectively, "Defendants") serve their Objections and Responses to Plaintiff's Fourth Requests for Production and Interrogatories pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

JACKSON WALKER LLP

By: /s/ Charles L. Babcock

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ATTORNEYS FOR DEFENDANTS

**CERTIFICATE OF SERVICE**

I hereby certify that on January 10, 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/ Charles L. Babcock

Charles L. Babcock

**OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FOURTH REQUEST FOR PRODUCTION**

**REQUEST FOR PRODUCTION NO. 18:** Please produce all written communications, including emails or ephemeral messages, concerning Richard Lowery or his speech, sent or received by Kelly Kamm, Andres Almazan, or Alti Aydogan, between June 1, 2022 and September 1, 2022. This request includes communications stored on privately owned devices or email accounts.

**OBJECTION:** Defendants object to this request because the term “ephemeral messages” is vague and ambiguous, even as defined. Defendants further object to this request because a request for “all written communications . . . concerning Richard Lowery” is overbroad, not relevant to any claim or defense, and is not proportional to the needs of the case, making it beyond the scope of discovery. Defendants further object to this request because Kelly Kamm, Andres Almazan, and Alti Aydogan are not named defendants in this suit, nor have there been any allegation by Plaintiff of any wrongdoing by them, and as such, the requested documents are irrelevant to the facts and legal issues in this case.

**RESPONSE:** Subject to these objections, see Defendants’ produced documents as to non-party Kelly Kamm. Defendants are willing to meet and confer on the request as it relates to non-parties Andres Almazan and Alti Aydogan.

**OBJECTIONS AND RESPONSES TO  
PLAINTIFF'S FOURTH SET OF INTERROGATORIES**

**INTERROGATORY NO. 8:** With regard to the text-message conversation produced as UT-LOWERY 005270, please state whether and when Jay Hartzell had one or more phone or in-person conversations concerning the topics of those messages with the sender of those messages on or about June 8, 2022 and summarize the content of any conversation.

**OBJECTION:** Defendants object to this interrogatory because non-party Jay Hartzell is not a named defendant in this suit, nor has there been any allegation by Plaintiff of any wrongdoing by President Hartzell, and as such, the request is overbroad and not relevant to any party’s claims or defenses, making it beyond the scope of discovery.

**ANSWER:** Subject to this objection and without disclosing any privileged information, Defendants respond as follows: No.