

Respectfully submitted,

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By: /s/ Charles L. Babcock

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ATTORNEYS FOR DEFENDANTS

CERTIFICATE OF SERVICE

I hereby certify that on October 30, 2023, 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

alleged decision to self-chill based on conversations that he allegedly had or other conversations that were allegedly communicated to him about his speech, and not proportional to the needs of the case, making it beyond the scope of discovery.

ANSWER:

Subject to this objection, from January 1, 2018, to October 13, 2023, University Compliance Services received 482 unique anonymous complaints, excluding the August 9, 2022 email regarding Richard Lowery.

INTERROGATORY NO. 6:

Please identify all persons Madison Gove consulted concerning Richard Lowery's tweets before she emailed UT Police Officer Bishop in August 2022 on the topic of Lowery's tweets.

OBJECTION:

Defendants object to this interrogatory because non-party Madison Gove is not a named defendant in this suit, nor has there been any allegation by Plaintiff of any wrongdoing by Madison Gove, and as such, the requested information is overbroad and not relevant to any party's claims or defenses, making it beyond the scope of discovery. Defendants further object that the term "consulted" is vague and ambiguous. Defendants further object because a request for the identity of "all persons" that this non-party "consulted" over an unlimited period of time is overbroad, not relevant to any party's claims or defenses, in particular, Plaintiff's alleged decision to self-chill based on conversations that he allegedly had or other conversations that were allegedly communicated to him about his speech, and not proportional to the needs of the case, making it beyond the discovery for that reason, as well.

ANSWER:

Subject to these objections, Meeta Kothare and Sandi Ruddick.

INTERROGATORY NO. 7:

Please state whether UT President Jay Hartzell has had any conversations concerning Richard Lowery's public speech, including Lowery's appearance on the Hanania podcast and Lowery's stated opinions about Hartzell's honesty and the handling of the Liberty Institute between January 1, 2022 and February 7, 2023. If yes, please identify all of those individuals and the dates of those conversations.

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. Defendants further object that a request for information about "any conversations" that President Hartzell may or may not have had regarding Plaintiff's public speech for more than a year is overbroad and not relevant to any party's claim or defense, in particular, Plaintiff's alleged decision to self-

chill based on conversations that he allegedly had or other conversations that were allegedly communicated to him about his speech, making it beyond the scope of discovery for that reason, as well. Defendants further object that this request seeks information protected from disclosure by the attorney-client privilege or work product doctrine.

ANSWER:

Subject to these objections and without disclosing any privileged information, Defendants respond as follows:

Professor Titman vaguely recalls a conversation with President Hartzell on July 19, 2022, at an event. Titman does not recall if the reason for this brief conversation was “Richard Lowery’s public speech, including Lowery’s appearance on the Hanania podcast and Lowery’s stated opinions about Hartzell’s honesty and the handling of the Liberty Institute.”

Defendants also direct Plaintiff to the August 9, 2022 email from Bob Rowling to President Hartzell, which is being produced.