

JAN 25 2019

At 3:30 P.M.  
Velva L. Price, District Clerk

CAUSE NO. D-1-GN-18-006623

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC, AND  
FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

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**~~PROPOSED~~ ORDER ON PLAINTIFFS' MOTION FOR EXPEDITED DISCOVERY  
IN AID OF PLAINTIFF'S RESPONSE TO DEFENDANTS' TCPA MOTION**

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Having considered Plaintiff's Motion for Expedited Discovery, the Court finds that there is good cause to grant the Motion, and hereby ORDERS that:

1. Plaintiff's Motion is GRANTED. After considering the pleadings and arguments of counsel, the Court rules that Plaintiff may serve the written discovery attached as Exhibit 1 to this Order, and that Plaintiff may take the following depositions: Alex Jones, InfoWars LLC, Free Speech Systems LLC, and Robert Jacobson.


2. Defendants shall respond to written discovery within 30 days of service.

3. Depositions shall be completed no later than 60 days after the service of written discovery unless otherwise agreed by the parties. Depositions will be allowed but shall be limited. Plaintiff may examine Alex Jones for no more than 4 hours. Plaintiff may examine a corporate representative from both InfoWars, LLC and Free Speech Systems, LLC for no more than 3 hours combined between the two deponents. Plaintiff may examine Robert Jacobson for no more than 2.5 hours.

4. As authorized by Tex. Civ. Prac. & Rem. Code Sec. 27.004, the court will "extend the hearing date to allow discovery." Oral hearing on Defendants' Motion to Dismiss under

the Texas Citizen's Participation Act is extended until May 2, 2019, which is less than 120 days after the service of the motion under Tex. Civ. Prac. & Rem. Code Sec. 27.003.

So ORDERED this 25<sup>th</sup> day of January, 2019.

  
\_\_\_\_\_  
Scott Jenkins  
Travis County District Judge

Respectfully submitted and entry requested,

**FARRAR & BALL, LLP**



\_\_\_\_\_  
MARK D. BANKSTON  
State Bar No. 24071066  
KYLE W. FARRAR  
State Bar No. 24034828  
WILLIAM R. OGDEN  
State Bar No. 24073531  
1010 Lamar, Suite 1600  
Houston, Texas 77002  
713.221.8300 Telephone  
713.221.8301 Fax

**EXHIBIT 1**

CAUSE NO. D-1-GN-18-001842

SCARLETT LEWIS	§	IN DISTRICT COURT OF
<i>Plaintiff</i>	§	
	§	
VS.	§	TRAVIS COUNTY, TEXAS
	§	
ALEX E. JONES, INFOWARS, LLC,	§	
AND FREE SPEECH SYSTEMS, LLC,	§	53 <sup>rd</sup> DISTRICT COURT
<i>Defendants</i>	§	

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**PLAINTIFF'S REQUESTS FOR ADMISSIONS, INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO ALEX E. JONES**

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TO: Defendant, Alex E. Jones, by and through his attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW Plaintiff in the above-styled cause and serves the following Requests for Admissions, Interrogatories and Requests for Production to Defendant, Alex E. Jones, under the Texas Rules of Civil Procedure. Plaintiffs hereby request that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiffs further request that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

**KASTER LYNCH FARRAR & BALL, LLP**



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MARK D. BANKSTON  
State Bar No. 24071066

mark@fbtrial.com  
KYLE W. FARRAR  
State Bar No. 24034828  
WILLIAM R. OGDEN  
State Bar No. 24073531  
1010 Lamar, Suite 1600  
Houston, Texas 77002  
713.221.8300 Telephone  
713.221.8301 Fax

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this \_\_\_\_ day of \_\_\_\_\_, 2019 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

**Via E-Service: fly63rc@verizon.net**

Mark C. Enoch  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Ste. 500  
Dallas, Texas 75254



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MARK D. BANKSTON

## DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession.
2. “Coverage” means the publishing of journalistic, pseudo-journalistic, or opinion content relating to a particular event.
3. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, instant messenger logs, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession.
4. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
5. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS  
TO DEFENDANT ALEX E. JONES**

**REQUEST FOR ADMISSION NO. 1:** Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

**RESPONSE:**

**REQUEST FOR ADMISSION NO. 2:** Admit that as of October 26, 2017, you had the right to direct or control the work performed by employees of Free Speech Systems, LLC and InfoWars, LLC.

**RESPONSE:**

**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT ALEX E. JONES**

**INTERROGATORY NO. 1:** Describe your job duties, responsibilities, and authority with Free Speech Systems, LLC between December 14, 2012 and October 26, 2017.

**ANSWER:**

**INTERROGATORY NO. 2:** Describe your job duties, responsibilities, and authority with InfoWars, LLC between December 14, 2012 and October 26, 2017.

**ANSWER:**

**INTERROGATORY NO. 3:** Describe your process for ensuring that factual assertions made in InfoWars programming regarding the Sandy Hook shooting were vetted for accuracy between December 14, 2012 and October 26, 2017.

**ANSWER:**

**INTERROGATORY NO. 4:** Identify any electronically stored information or documents relevant to Plaintiff's petition or your TCPA motion which have been destroyed, deleted, corrupted, damaged, overwritten, or otherwise lost.

**ANSWER:**



**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION  
TO DEFENDANT ALEX E. JONES**

**REQUEST FOR PRODUCTION NO. 1:** All communications of which you or any of your agents were a participant and in which the following topics or individuals are referenced:

- a) The Sandy Hook school shooting and the subsequent investigation and media coverage.
- b) The notion that the Sandy Hook school shooting was a staged, synthetic, phony, or manipulated event.
- c) InfoWars' coverage of Sandy Hook.
- d) Scarlett Lewis, Neil Heslin, or their son.
- e) Jim Fetzer.
- f) Wolfgang Halbig.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** All communications relating to the videos or articles cited in the Declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** All contracts between you, InfoWars, LLC, or Free Speech Systems, LLC.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4:** All communications between you, InfoWars, LLC, or Free Speech Systems, LLC, or anyone acting on your or their behalf, regarding policies and procedures for the factual vetting for reporting on InfoWars programming which applied to Infowars' coverage of the Sandy Hook shooting.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 5:** All communications with any third-parties regarding their investigations and/or media projects about the Sandy Hook school shooting.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:** All letters of complaint or similar communications in which a third-party expresses their displeasure regarding InfoWars' coverage of Sandy Hook.

**RESPONSE:**

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,  
AND FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

**VERIFICATION**

STATE OF TEXAS

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COUNTY OF \_\_\_\_\_

**BEFORE ME**, the undersigned notary public, on this day personally appeared ALEX E. JONES, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

\_\_\_\_\_  
ALEX E. JONES

**SUBSCRIBED AND SWORN TO BEFORE ME**, this the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Notary Public in and for the State of Texas

My Commission Expires:  
\_\_\_\_\_

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,  
AND FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

**PLAINTIFF'S REQUESTS FOR ADMISSIONS, INTERROGATORIES AND  
REQUESTS FOR PRODUCTION TO DEFENDANT, FREE SPEECH SYSTEMS, LLC**

TO: Defendant, Free Speech Systems, LLC, by and through its attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Plaintiff in the above-styled and numbered cause and serves the following Requests for Admissions, Interrogatories and Requests for Production to Defendant, Free Speech Systems, LLC, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

**KASTER LYNCH FARRAR & BALL, LLP**



MARK D. BANKSTON  
State Bar No. 24071066  
mark@fbtrial.com  
KYLE W. FARRAR

State Bar No. 24034828  
WILLIAM R. OGDEN  
State Bar No. 24073531  
1010 Lamar, Suite 1600  
Houston, Texas 77002  
713.221.8300 Telephone  
713.221.8301 Fax

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this \_\_\_\_ day of \_\_\_\_\_, 2019 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

**Via E-Service: fly63rc@verizon.net**

Mark C. Enoch  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Ste. 500  
Dallas, Texas 75254



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MARK D. BANKSTON

## DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession, including communications in the custody of any employee or agent of Free Speech Systems LLC.
2. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, instant messenger logs, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession, including documents in the custody of any employee or agent of Free Speech Systems LLC.
3. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. “Organizational chart” means a diagram that shows the structure of an organization and the relationships and relative ranks of its parts and positions/jobs.
5. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.

**PLAINTIFF'S FIRST SET OF ADMISSIONS  
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

**REQUEST FOR ADMISSION NO. 1:** Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

**RESPONSE:**



**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

**INTERROGATORY NO. 1:** Identify all persons answering or supplying information used in answering these discovery requests and identify their job duties at Free Speech Systems, LLC.

**ANSWER:**

**INTERROGATORY NO. 2:** Identify each person who has served as an officer, director, or management-level employee of Free Speech Systems, LLC since December 14, 2012.

**ANSWER:**

**INTERROGATORY NO. 3:** Identify every employee or agent of Free Speech Systems, LLC who was involved in the creation, research, editing, marketing, funding, distribution, or publication of the videos or articles cited in the Declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery, and describe their specific role(s).

**ANSWER:**

**INTERROGATORY NO. 4:** For each person who had ownership interest in Free Speech Systems, LLC on June 26, 2017, state:

- a) their full name.
- b) the date(s) upon which the person acquired their ownership interest.
- c) the type of consideration paid or promised for the ownership interest and the date(s) on which it was paid or promised.
- d) the percentage of that individual's ownership interest.
- e) whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer, or director of Free Speech Systems, LLC, or InfoWars, LLC, and, if so, the identity of the other person and the nature of the relationship.

**ANSWER:**

**INTERROGATORY NO. 5:** Identify by date and title every article or video which contains the words "Sandy Hook" or "Newtown" in the title created or published by Free Speech Systems, LLC which is not already listed in the Declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery.

**ANSWER:**

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION  
TO DEFENDANT FREE SPEECH SYSTEMS, LLC**

**REQUEST FOR PRODUCTION NO. 1:** A copy of every article and a digital copy and transcript of every video you identified in response to Interrogatory No. 5.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** All communications of which you or any of your agents were a participant and in which the following topics or individuals are referenced:

- a) The Sandy Hook school shooting and the subsequent investigation and media coverage.
- b) The notion that the Sandy Hook school shooting was a staged, synthetic, phony, or manipulated event.
- c) InfoWars' coverage of Sandy Hook.
- d) Scarlett Lewis, Neil Heslin, or their son.
- e) Jim Fetzer.
- f) Wolfgang Halbig.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** All communications relating to the videos or articles cited in the Declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery, or the videos and articles you identified in response to Interrogatory No. 5.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 4:** All communications between Free Speech Systems, LLC, InfoWars, LLC, or Alex Jones, or anyone acting on their behalf regarding policies and procedures for the factual vetting for reporting which applied to InfoWars' coverage of the Sandy Hook Elementary School shooting, from December 14, 2012 to October 26, 2017.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 5:** All communications with any third-parties regarding their investigations and/or media projects about Sandy Hook.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 6:** All contracts you have executed with InfoWars, LLC, Alex Jones, or anyone acting on their behalf.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 7:** All documents reflecting policies for the factual vetting of information published by InfoWars, as in effect between December 14, 2012 and October 26, 2017.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 8:** All documents setting forth InfoWars' editorial standards or guidelines, as in effect between December 14, 2012 and October 26, 2017.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 9:** Any organizational charts for Free Speech Systems, LLC created between Dec. 14, 2012 and October 26, 2017.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 10:** All incorporating documents for Free Speech Systems, LLC, including article of incorporation, bylaws, certificate of incorporation, and notice of incorporation.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 11:** All letters of complaint or similar communications in which a third-party expresses their displeasure regarding InfoWars' coverage of Sandy Hook.

**RESPONSE:**

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,  
AND FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

**VERIFICATION**

STATE OF TEXAS

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COUNTY OF \_\_\_\_\_

**BEFORE ME**, the undersigned notary public, on this day personally appeared \_\_\_\_\_, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

\_\_\_\_\_  
AFFIANT

**SUBSCRIBED AND SWORN TO BEFORE ME**, this the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Notary Public in and for the State of Texas

My Commission Expires:  
\_\_\_\_\_

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,  
AND FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

**PLAINTIFF’S REQUESTS FOR ADMISSIONS, REQUESTS FOR  
INTERROGATORIES AND REQUESTS FOR PRODUCTION TO DEFENDANT,  
INFOWARS, LLC**

TO: Defendant, InfoWars, LLC, by and through its attorney of record, Marc C. Enoch, Glast, Phillips & Murray, P.C., 14801 Quorum Drive, Ste.500, Dallas, Texas 75254.

COMES NOW, Plaintiffs in the above-styled and numbered cause and serves the following Requests for Admissions, Interrogatories and Requests for Production to Defendant, InfoWars, LLC, under the Texas Rules of Civil Procedure. Plaintiff hereby requests that answers and responses to the same be answered in writing under oath, within the time and manner prescribed by the applicable rules. Plaintiff further requests that Defendant produce the following documents, or things, within thirty (30) days of service of this request by either producing the original of such documents for examination and copying or delivering legible and accurate copies thereof to the office of the undersigned during usual business hours.

Respectfully submitted,

**KAISTER LYNCH FARRAR & BALL, LLP**



MARK D. BANKSTON  
State Bar No. 24071066  
mark@fbtrial.com

KYLE W. FARRAR  
State Bar No. 24034828  
WILLIAM R. OGDEN  
State Bar No. 24073531  
1010 Lamar, Suite 1600  
Houston, Texas 77002  
713.221.8300 Telephone  
713.221.8301 Fax


**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above and foregoing instrument has been served on counsel of record in compliance with the Texas Rules of Civil Procedure on this \_\_\_\_ day of \_\_\_\_\_, 2019 by facsimile, US Postal Mail, hand-delivery, and/or e-mail.

**Via E-Service: fly63rc@verizon.net**

Mark C. Enoch  
Glast, Phillips & Murray, P.C.  
14801 Quorum Drive, Ste. 500  
Dallas, Texas 75254

  
\_\_\_\_\_  
MARK D. BANKSTON

## DEFINITIONS

As used herein, the words defined below shall be deemed to have the following meanings:

1. “Communication” as used in these requests means the conveying or sharing of information, ideas, or feelings, by whatever medium, be it oral, written, electronic, or otherwise. These requests seek all communications in your custody or constructive possession, including communications in the custody of any employee or agent of InfoWars LLC.
2. “Document” as used in these requests means all handwritten, typed, audio recorded, video recorded, or electronic representation of any kind, including legal instruments, agreements, letters, e-mails, text messages, instant messenger logs, notices, specifications, instructions, literature, books, magazines, newspapers, booklets, notes, notebooks, log books, diaries, memoranda, manuscripts, manifestos, data compilations, reports, studies, analyses, surveys, calculations, videos, sound files, photographs, image macros, memes, blog posts, internet articles, social media posts, internet comments, screenshots, blockchains, illustrations, diagrams, symbols, bulletins, circulars, telegrams, telexes, or any other reasonably similar representational thing, as well as any deleted copies of the aforesaid or drafts upon which have been placed any additional marks or notations. These requests seek all documents in your custody or constructive possession, including documents in the custody of any employee or agent of InfoWars LLC.
3. “InfoWars,” generically, means the brand name of the media organization founded by Alex Jones, whether operating as InfoWars LLC, Free Speech Systems LLC, or any other corporate name.
4. “Organizational chart” means a diagram that shows the structure of an organization and the relationships and relative ranks of its parts and positions/jobs.
5. “Video” as used in these requests means any discrete and identifiable piece of InfoWars video content.



**PLAINTIFF'S FIRST SET OF ADMISSIONS  
TO DEFENDANT INFOWARS, LLC**

**REQUEST FOR ADMISSION NO. 1:** Admit that prior to responding to these discovery requests, you searched all documents in your possession or control that may contain responsive information.

**RESPONSE:**

**REQUEST FOR ADMISSION NO. 2:** Admit that InfoWars, LLC was involved in the creation, research, editing, marketing, funding, staffing, distribution, or publication of any of the articles or videos cited in the declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery.

**RESPONSE:**

**REQUEST FOR ADMISSION NO. 3:** Admit that between December 14, 2012 and October 26, 2017, InfoWars, LLC had the authority to remove content from InfoWars.com if InfoWars, LLC determined that the content violated the rights of others or was not appropriate for the website.

**RESPONSE:**

**PLAINTIFF'S FIRST SET OF INTERROGATORIES  
TO DEFENDANT INFOWARS, LLC**

**INTERROGATORY NO. 1:** Identify all persons answering or supplying information used in answering these discovery requests and identify their job duties at InfoWars, LLC.

**ANSWER:**

**INTERROGATORY NO. 2:** Describe the business purpose of InfoWars, LLC.

**ANSWER:**

**INTERROGATORY NO. 3:** Describe all the ways in which InfoWars, LLC generates revenue.

**ANSWER:**

**INTERROGATORY NO. 4:** Identify every employee or agent of InfoWars, LLC who was involved in the creation, research, editing, marketing, funding, staffing, distribution, or publication of any of the articles or videos cited in the declaration of Brooke Binkowski, attached to Plaintiff's Motion for Expedited Discovery.

**ANSWER:**

**INTERROGATORY NO. 5:** Does InfoWars, LLC share office space with any other named party?

**ANSWER:**

**INTERROGATORY NO. 6:** Does InfoWars, LLC share common employees with any other named party?

**ANSWER:**

**INTERROGATORY NO. 7:** Has an employee or agent of InfoWars, LLC ever rendered services on behalf on any named other party, or has an employee or agent of any named party ever rendered services on behalf on InfoWars, LLC? Describe.

**ANSWER:**

**INTERROGATORY NO. 8:** Has InfoWars, LLC ever made an undocumented transfer of funds to any named party, or has any named party ever made an undocumented transfer of funds to InfoWars, LLC? Describe.

**ANSWER:**

**INTERROGATORY NO. 9:** For each person who had ownership interest in InfoWars, LLC

between December 14, 2012 and October 26, 2017, state:

- a) their full name.
- b) the date(s) upon which the person acquired their ownership interest.
- c) the type of consideration paid or promised for the ownership interest and the date(s) on which it was paid or promised.
- d) the percentage of that individual's ownership interest.
- e) whether the person is related by blood or marriage to any other person who is or has been a shareholder, officer, or director of InfoWars, LLC or Free Speech Systems, LLC, and, if so, the identity of the other person and the nature of the relationship.

**ANSWER:**

**INTERROGATORY NO. 10:** Identify each person who has served as an officer, director, or management-level employee of InfoWars, LLC at any time during the past six years.

**ANSWER:**

**PLAINTIFF'S FIRST REQUESTS FOR PRODUCTION  
TO DEFENDANT INFOWARS, LLC**

**REQUEST FOR PRODUCTION NO. 1:** An organizational chart for InfoWars, LLC as of October 26, 2017.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 2:** All contracts in effect between InfoWars, LLC and any other party.

**RESPONSE:**

**REQUEST FOR PRODUCTION NO. 3:** All incorporating documents for InfoWars, LLC, including article of incorporation, bylaws, certificate of incorporation, and notice of incorporation.

**RESPONSE:**

SCARLETT LEWIS  
*Plaintiff*

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IN DISTRICT COURT OF

VS.

TRAVIS COUNTY, TEXAS

ALEX E. JONES, INFOWARS, LLC,  
AND FREE SPEECH SYSTEMS, LLC,  
*Defendants*

53<sup>rd</sup> DISTRICT COURT

**VERIFICATION**

STATE OF TEXAS

§  
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§

COUNTY OF \_\_\_\_\_

**BEFORE ME**, the undersigned notary public, on this day personally appeared \_\_\_\_\_, known to me to be the person whose signature is affixed hereto, and swore and acknowledged to me that the answers to the above and foregoing answers to Interrogatories are true and correct to the best of his/her personal knowledge and belief.

\_\_\_\_\_  
AFFIANT

**SUBSCRIBED AND SWORN TO BEFORE ME**, this the \_\_\_\_\_ day of \_\_\_\_\_, 2018.

\_\_\_\_\_  
Notary Public in and for the State of Texas

My Commission Expires:  
\_\_\_\_\_