

November 26, 2007  
Letter from Natalie Maines: WM3 Call to Action

I'm writing this letter today because I believe that three men have spent the past 13 years in prison for crimes they didn't commit.

On May 5th, 1993 in West Memphis, Arkansas three 8 eight-year-old boys, Steve Branch, Christopher Eynns, and Michael Moore were murdered.

Three teenage boys, Damien Echols, Jesse Misskelley, and Jason Baldwin were convicted of the murders in 1994. Jason Baldwin and Jesse Misskelley received life sentences without parole, and Damien Echols sits on death row.

I encourage everyone to see the HBO documentaries, Paradise Lost and Paradise Lost 2 for the whole history of the case.

I only discovered the films about 6 months ago, and when I finished Paradise Lost 1 I immediately got online to make sure that these three wrongly convicted boys had been set free since the films were released. My heart sank when I learned that the boys were now men and were still in prison. I couldn't believe it.

I searched for answers as to what had been done and what was being done to correct this injustice. I donated to the defense fund and received a letter from Damien Echols wife, Lorri. She is a lovely woman who has dedicated her time and heart to her husband. I was glad to hear that after so many years of fighting for justice it looked like things were finally happening. Below, I have written what the DNA and forensics evidence shows. I hope after reading it and looking at the WM3.org website, you will know that the wrong guys are sitting in jail right now, and feel compelled to help.

Inspired and determined to see the justice system work, many people have worked on this case pro bono for the past 13 years. However, there are still costs that go along with the struggle to freeing these three men.

There has been a wonderful resurgence of interest by the media for this case, but nobody mentions the need for funds. Donations to the defense fund are desperately needed. DNA and forensics tests are expensive. They are also what will finally set these men free. Due to so many people's passion and generosity, what would normally be a case that costs millions is costing a fraction of that. I know around the holidays we all get inundated with deserving causes and charities that are in need of donations, but this can't wait!

With all of the new evidence things are finally moving - and fast!

Any money that you can donate is desperately needed to pay for the experts and the federal court hearing that is just weeks away. There is also a letter campaign that has been started by a new and energized group of people in Arkansas. Click here to download the sample letter. Signing and sending this letter makes it very difficult for this case to be ignored. Please mail the letters to the following address:

Arkansas Take Action  
Capt Peck, Coordinator  
P.O. Box 17788  
Little Rock, AR 72222-7788

After so many years it literally all comes down to this hearing.

The evidence is so strong that at the very least the judge will grant a new trial, but hopefully he will overturn the verdict and these guys will finally be sent home to their lives and families. I know that this is a hard thing to just take my word on, so please look at the case and the evidence for yourself. I am confident that you will see the DNA evidence is irrefutable and that these three men did not get the kind of trial that is promised to us - as Americans.

The system hasn't only failed Damien, Jesse, and Jason, but it has failed the three little boys that were murdered. Their killer(s) is still out there, and justice has yet to be served. Please know that your generosity will make a difference.

Please know that your generosity will make a difference.

Sincerely,  
Natalie Maines Peadar

The following is just some of the DNA and forensic evidence that will be presented in the federal court hearing.

In late October, legal papers were filed in federal court in Arkansas showing that Damien Echols was wrongfully convicted. The 200-page court filing includes DNA evidence that fail to link any of the three boys

to the crime scene. This is very important because the prosecution claimed that Echols had sodomized the victims.

-DNA tests also show that a hair belonging to Terry Hobbs, the step-father of one of the victims, was found in the ligature of one of the victims

-DNA tests also match a hair at the crime scene to a friend of Hobbs that was with him that day

-DNA test results show foreign DNA-from someone other than Echols, Misskelly, or Baldwin-on the penises of two of the victims

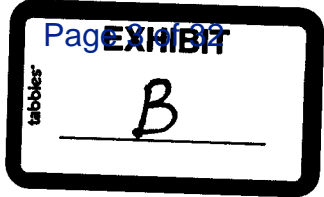
-Scientific analysis from some of the nation's leading forensics experts, stating that wounds on the victims' bodies were caused by animals at the crime scene-not by knives used by the perpetrators, as the prosecution claimed. These wounds were the centerpiece of the prosecution's case, and evidence was presented that a knife recovered from a lake near one defendant's home caused the wounds.

-Sworn affidavits outlining new evidence uncovered by Pam Hobbs (the ex-wife of Terry Hobbs) who found a knife in Terry Hobbs' drawer that her son (one of the victims) had carried with him at all times. After her son was killed, the knife was not among his personal effects that police gave to the Hobbs family, and Pam Hobbs always assumed that her son's murderer had taken it during the crime.

-New information implicating Terry Hobbs-including his own statements made to police in recent interviews where he acknowledged that several of his relatives suspect him in the crime. The filing also includes a chronology of Hobbs' activities on the night of the crimes, when he washed his clothes and sheets at odd hours for no reason other than to hide evidence from the crimes.

-A sworn affidavit that refutes hearsay evidence from Echols' trial. The mother of one of two girls who testified that they overheard Echols admit to the crime at a softball game now says that Echols' statement was not serious and that neither she nor her daughter believes he committed the crime

Evocast Theory | Terms and Conditions of Use  
©View Design and Programming by EML Creative Productions, Inc.



IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF ARKANSAS

TERRY HOBBS,

Plaintiff,

v.

NATALIE PASDAR, et al.,

Defendants.

§  
§  
§  
§  
§  
§  
§  
§  
§

CASE NO. 4:09CV00008 BSM

**DEFENDANT NATALIE PASDAR’S OBJECTIONS AND RESPONSES TO THE  
FIRST SET OF REQUESTS FOR ADMISSIONS OF PLAINTIFF TERRY HOBBS**

Pursuant to the Federal Rules of Civil Procedure, Defendant, Natalie Pasdar (“Ms. Pasdar”), hereby serves her Objections and Responses to the First Set of Requests for Admission of Terry Hobbs (“Hobbs”).

**I.  
GENERAL OBJECTIONS**

The following General Objections are incorporated by reference into each and every Request response that follows.

1. Ms. Pasdar objects to Plaintiff’s use of the terms “you,” “your,” or “Defendant” (a) to the extent that the use of those words causes any Request to exceed the permissible scope of discovery under the FEDERAL RULES OF CIVIL PROCEDURE, (b) to the extent the use of those words includes any corporation, business, entity, or individuals other than Ms. Pasdar, and (c) to the extent the use of those words is intended to include agents, representatives, [and] attorneys as calling for information subject to the attorney-client, work product, and/or joint defense privileges.

2. Ms. Pasdar objects to the Requests for Admissions, and to each and every individual Request contained therein, to the extent that they call for information not reasonably available to, or documents not within the possession, custody, or control of Ms. Pasdar . The answers given herein are based on information reasonably available to Ms. Pasdar and documents within Ms. Pasdar's possession, custody, or control, including Ms. Pasdar 's knowledge of same.

3. Ms. Pasdar objects to Plaintiff's Requests for Admissions as uncertain, overbroad, unduly burdensome, and oppressive to the extent that many Requests fail to specify any responsive time period, and accordingly are not limited to events relevant to this lawsuit.

4. Ms. Pasdar expressly incorporates the above General Objections into each specific Response to the Requests set forth below as if set forth in full therein. A Response to a Request shall not work as a waiver of any applicable Specific or General Objection.

## II.

These Responses are made solely for the purpose of this action. Each Response is subject to all objections, as to competence, relevance, materiality, propriety, and admissibility, and to any and all other objections on the grounds that would require the exclusion of any statements contained herein if such Request were asked of, or statements contained herein were made by a witness present and testifying in Court, all of which objections and grounds are expressly reserved and may be interposed at the time of trial.

The following Responses are based upon information presently available to and located by Ms. Pasdar. Ms. Pasdar has not completed her investigation of the facts relating to this case, discovery in this action, or her preparation for trial. The Responses given herein are without prejudice to Ms. Pasdar's right to produce evidence of any additional facts. As such, these

Responses are subject to supplementation and amendment as discovery in this case progresses, should future investigation indicate that supplementation or amendment is necessary.

No incidental or implied admissions are intended by the Responses provided herein. The mere fact that Ms. Pasdar has responded to or objected to any Request should not be taken as an admission that she admits the existence of any facts set forth or assumed by such Request. That Ms. Pasdar has responded to part or all of any Request is not intended to be, and shall not be construed to be, a waiver by Ms. Pasdar of any part of any objection to any Request.

To the extent that any or all of the Responses call for information protected by the work-product doctrine, the attorney-client privilege, the joint defense privilege, or any other privilege, Ms. Pasdar objects to each and every such Request and will not supply or render information protected from discovery by virtue of such doctrine or privileges.

**III.**  
**OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSION**

**REQUEST FOR ADMISSION NO. 1:** Admit that you wrote the letter that is attached hereto as Exhibit "A".

**RESPONSE:** Admit that Ms. Pasdar wrote that portion of Exhibit A that begins with "I'm writing this letter today ..." through the phrase: "that will be presented in the federal court hearing." Deny the remainder of Exhibit A.

**REQUEST FOR ADMISSION NO. 2:** Admit that the "200-page court filing" referenced in Exhibit "A" is a pleading filed on October 29, 2007, in United States District Court, Eastern District of Arkansas by Damien Echols which is titled "Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus".

**RESPONSE:** While Ms. Pasdar believes this to be at least in part correct, the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 3:** Admit that prior to November 27, 2007, you read the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus referenced in Request for Admission No. 2.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 4:** Admit that prior to November 27, 2007, you did not read the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus referenced in Request for Admission No. 2.

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 5:** Admit that the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus is 174 pages long.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is in violation of Federal Rule of Civil Procedure 36 which dictates "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." The Memorandum of Points and Authorities in Support of the Second Amended Petition for Writ of Habeas Corpus ("Memo") is not attached to the Request for Admissions. Subject to the preceding objection, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 6:** Admit that prior to November 27, 2007, you read the exhibits attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus referenced in Request for Admission No. 2.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 7:** Admit that prior to November 27, 2007, you did not read the exhibits attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus referenced in Request for Admission No. 2.

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 8:** Admit that in the first few days after you viewed the film *Paradise Lost* you believed that Michael Moore, Christopher Byers or Steve Branch suffered severe knife wounds that were inflicted when they were murdered in May 1993.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request as she does not recall what she originally believed, and it is therefore denied; however, Ms. Pasdar admits that in the first few days after she viewed the films *Paradise Lost* and *Paradise Lost 2*, she believed that the West Memphis 3 did not kill Michael Moore, Christopher Byers and Steve Branch and that they should receive, at minimum, a new trial.

**REQUEST FOR ADMISSION NO. 9:** Admit that in the first few days after you viewed the film *Paradise Lost 2* you believed that Michael Moore, Christopher Byers or Steve Branch suffered bite wounds that were inflicted when they were murdered in May 1993, and the bite wounds did not match the dental impressions of Damien Echols, Jesse Miskelly or Jason Baldwin.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request as she does not recall what she originally believed and it is therefore denied; however, Ms. Pasdar admits that in the first few days after she viewed the films *Paradise Lost* and *Paradise Lost 2*, she believed that the West Memphis 3 did not kill Michael Moore, Christopher Byers and Steve Branch and that they should receive, at minimum, a new trial.

**REQUEST FOR ADMISSION NO. 10:** Admit that in the first few days after you viewed the films *Paradise Lost* and *Paradise Lost 2* you believed that John Mark Byers killed Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request as she does not recall what she originally believed and it is therefore denied; however, Ms. Pasdar admits that in the first few days after she viewed the films *Paradise Lost* and *Paradise Lost 2*, she believed that the West Memphis 3 did not kill Michael Moore, Christopher Byers and Steve Branch and that they should receive, at minimum, a new trial.

**REQUEST FOR ADMISSION NO. 11:** Admit that prior to November 27, 2007, you read page 46 and pages 106-7 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus. Such pages are attached hereto as Exhibit "B".

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 12:** Admit that you consider fingerprint evidence to be forensic evidence.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it calls for a legal conclusion and expert opinion outside the scope of her areas of expertise. Ms. Pasdar further objects on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements of which plaintiff complains. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 13:** Admit that page 46 and pages 106-107 the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus, it is stated that during the murder investigation of Michael Moore, Christopher Byers and Steve Branch, a print was discovered within five to ten feet of where the first body of the three murder victims were found and that the print was at an angle that made it clear that it had been left by someone who had been in the water.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the grounds that the document speaks for itself. Subject the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.



**REQUEST FOR ADMISSION NO. 14:** Admit that you believe that the print referenced in Request for Admission No. 13 was found within five to ten feet of where the first body of the three murder victims that Damien Echols was convicted of murdering was discovered and that the print was at an angle that made it clear that it had been left by someone who had been in the water.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements of which plaintiff complains. Ms. Pasdar further objects on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 15:** Admit that you believe that the fact that the print did not match Echols, Miskelly, Baldwin or any officer who was at the scene is powerful circumstantial evidence that someone other than Echols, Miskelly or Baldwin committed the murder of Michael Moore, Christopher Byers or Steve Branch.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements of which plaintiff complains. Ms. Pasdar further objects to the request as vague and ambiguous as phrased. Ms. Pasdar further objects on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 16:** Admit that the document attached hereto as Exhibit "C" is a true and correct copy of an Arkansas Crime Laboratory report prepared by Wesley A. Sossomon, Certified Latent Print Examiner.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 17:** Admit that the print referenced as Item No. "OP-1" in Exhibit "C" is the same print referred to on pages 46 and 106-107 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 18:** Admit that Wesley A. Sossomon, Certified Latent Print Examiner, determined that the print referred to as Item No. "OP-1" did not match Plaintiff Terry Hobbs.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 19:** Admit that that the print referred to as Item No. "OP-1" in Exhibit "C" does not match Plaintiff Terry Hobbs.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 20:** Admit that if the print referenced on pages 46,106-107 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007, does not match Terry Hobbs, it is powerful circumstantial evidence that someone other than Terry Hobbs committed the murder of Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the ground that it calls for speculation. Ms. Pasdar further objects on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements of which plaintiff complains. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 21:** Admit that Exhibit "D" attached hereto is a true and accurate print version of a posting you made to your My Space page at 2:01 on November 21, 2007.

**RESPONSE:** Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny the time of the posting. Ms. Pasdar admits that Exhibit D is a true and accurate print version of a posting made to Ms. Pasdar's My Space Page on or about November 21, 2007. Ms. Pasdar denies that she made the posting; Ms. Pasdar admits that she caused it to be made.

**REQUEST FOR ADMISSION NO. 22:** Admit that you wrote the posting referenced as Exhibit "D" in Request for Admission No. 21.

**RESPONSE:** Admit that Ms. Pasdar wrote that portion of Exhibit "D" that begins with "I'm writing this letter today ..." though the phrase: "that will be presented in the federal court hearing." Deny with respect to the remainder of Exhibit D.

**REQUEST FOR ADMISSION NO. 23:** Admit that in the postings which are attached here as Exhibits "A" and "D" you stated "Below, I have written what the DNA and forensic evidence shows."

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 24:** Admit that in the postings which are attached here as Exhibits "A" and "D" you stated "I know that it is a hard thing to just take my word on, so please look at the case and the evidence for yourself."

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 25:** Admit that you read the DNA and forensic evidence that was presented in the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007, and the exhibits that were attached thereto.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it is vague and ambiguous with regard to the meaning of "read" and whether the request means read the actual evidence, read the Memo and/or read the Memo exhibits. Subject to the preceding objections, Ms. Pasdar denies that she read the Memo.

**REQUEST FOR ADMISSION NO. 26:** Admit that Exhibits P, Q, R, S, T, U, V, W, Z, AA and BB which were attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007 are among the exhibits in which the DNA evidence was presented by Damien Echols.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates that "Each matter must be separately stated" and that "A request to admit to the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 27:** Admit that Exhibit "E" attached hereto is a true and accurate copy of Exhibit W which was attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates that "Each matter must be separately stated" and that "A request to admit to the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 28:** Admit that Result No. 6.) which appears on page 3 of Exhibit "E" (Echols Exhibit W) listed 6 items of evidence which were NOT CONSISTENT with referenced items from victim Michael Moore (2S04-114-41), victim Steve Branch (2S04-114-43) and victim Christopher Byers (2S04-114-45).

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that it calls for speculation. Ms. Pasdar further objects on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 29:** Admit that Exhibit "F" attached hereto is a true and accurate copy of Exhibit V which was attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates that "Each matter must be separately stated" and that "A request to admit to the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 30:** Admit that pages 1-3 of Exhibit "F" (Echols Exhibit V) contains a list of all of the items that were submitted to Bode Technology for DNA testing pursuant to an order entered by Judge David Burnett dated February 23, 2005, which is referenced on page 55 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 31:** Admit that your reference in Exhibits “A” and “D” to “the ligature of one of the victims” is a reference to one of the shoe laces that were used to tie each hand to each leg of each victim before the bodies of Michael Moore, Christopher Byers and Steve Branch victims were submerged in the water from which they were recovered on May 6, 1993.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Subject to the preceding objections, Ms. Pasdar denies that she wrote the statement made the subject of this request but admits that she understood that the reference to “ligature of one of the victims” was a reference to the ligature in which Hobbs’ DNA was found.

**REQUEST FOR ADMISSION NO. 32:** Admit that Bode # 2S04-114-03A referenced on page 3 of Exhibit “E” (Echols Exhibit W) and page 1 of Exhibit “F” (Echols Exhibit V) is the hair which you claim belongs to Terry Hobbs.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Subject to the preceding objections, Ms. Pasdar denies that she made any such claim and further states that she has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 33:** Admit that the only DNA evidence from the crime scene which you claim belongs to Terry Hobbs which was submitted in the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007 is mitochondrial (“mtDNA”) testing of the evidenced described on page 3 of Exhibit “E” (Echols Exhibit W) as Bode # 2S04-114-03Aa.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 34:** Admit that Bode # 2S04-114-15 referenced on page 3 of Exhibit "E" (Echols Exhibit W) and page 2 of Exhibit "F" (Echols Exhibit V) is identified in Exhibit "F" (Echols Exhibit V) as a "Hair from C. Byers ligature".

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 35:** Admit that Terry Hobbs is excluded as the donor of Bode # 2S04-114-15, which is referenced on page 3 of Exhibit "E" (Echols Exhibit W) and page 2 of Exhibit "F" (Echols Exhibit V) and is identified in Exhibit "F" (Echols Exhibit V) as a "Hair from C. Byers ligature".

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 36:** Admit that on page 108 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007 are the exhibits in which the DNA evidence was presented by Damien Echols, it is stated that John Douglas, a witness for Damien Echols, concluded that the person who killed Michael Moore, Christopher Byers and Steve Branch acted alone.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated" and that "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 37:** Admit that you agree with John Douglas that the person who killed Michael Moore, Christopher Byers and Steve Branch acted alone.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements which plaintiff complains. Ms. Pasdar further objects on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 38:** Admit that on November 27, 2007 you had no basis in fact to disagree with the conclusion of John Douglas that the person who killed Michael Moore, Christopher Byers and Steve Branch acted alone.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 39:** Admit that if a hair on a shoe string used to bind a victim is sufficient evidence to support a conclusion that a person that the hair belongs to is the killer, then the hair identified as Bode # 2S04-114-15 referenced in Request for Admission No. 34 must belong to the killer.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that it calls for speculation. Ms. Pasdar further objects on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Ms. Pasdar objects on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements which plaintiff complains. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.



**REQUEST FOR ADMISSION NO. 40:** Admit that you are aware that the Echols defense team held a press conference in Little Rock, AR on November 1, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's knowledge after the publication of the statements of which plaintiff complains. Subject to the preceding objections, Ms. Pasdar admits that she was aware of the press conference at the time of the statements of which plaintiff complains.

**REQUEST FOR ADMISSION NO. 41:** Admit that in Exhibits "A" and "D" attached hereto you state "I hope after reading it and looking at the WM3.org website, you will know that the wrong guys are sitting in jail right now, and feel compelled to help."

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 42:** Admit that you have followed and continue to follow developments regarding the cases of Echols, Miskelly and Baldwin on what you describe as the WM3.org website.

**RESPONSE:** Ms. Pasdar objects to this request on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's actions after the publication of the statements which plaintiff complains. Subject to the preceding objections, Ms. Pasdar admits this request.

**REQUEST FOR ADMISSION NO. 43:** Admit that there is a video recording of the Echols defense team press conference which appears on what you describe as the WM3.org website.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is vague and ambiguous and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Ms. Pasdar further objects to this request on the grounds that it is an improper request in that a website is a dynamic space and a video on the site today may not be there tomorrow. Subject to the preceding objections, Ms. Pasdar admits that she reviewed a video recording of the Echols defense team press conference on the WM3.org website, but she has made reasonable inquiry and the information presently known to or readily obtainable by her is insufficient to enable her to admit or deny whether that video is the same video as the video currently available on the site.

**REQUEST FOR ADMISSION NO. 44:** Admit that you have viewed the video recording of the Echols defense team's press conference.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is vague and ambiguous with regard to which video is "the video recording of the Echols defense team's press conference" and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar admits that she reviewed a video recording of the Echols defense team press conference on the WM3.org website prior to making the statements that form the basis of Hobbs' complaint, but she has made reasonable inquiry and the information presently known to or readily obtainable by her is insufficient to enable her to admit or deny whether that video is the same video as the video currently on the site or to which this request refers.

**REQUEST FOR ADMISSION NO. 45:** Admit that during the November 1, 2007 Echols defense team press conference Thomas Fedor, Echols' DNA expert, stated as follows: "The two hairs I know about, the one that could have in fact come from Mr. Hobbs and the one that could have in fact come from David Jacoby, constitute what I would call weak evidence."

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is vague and ambiguous and appears to reference a video of the Echols defense team's press conference, though it is unclear which video, and on the grounds it violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar admits that she reviewed a video recording of the Echols defense team press conference on the WM3.org website prior to making the statements that form the basis of Hobbs' complaint, but she has made reasonable inquiry and the information presently known to or readily obtainable by her is insufficient to enable her to admit or deny whether that video is the same video as the video currently on the site or to which this request refers (which would allow her to admit or deny the request); it is therefore denied.

**REQUEST FOR ADMISSION NO. 46:** Admit that in Exhibits "A" and "D" attached hereto you state "The evidence is so strong that at the very least I hope after reading it and looking at the WM3.org website, you will know that the wrong guys are sitting in jail right now, and feel compelled to help."

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 47:** Admit that on page 65 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007 it states “Do the mitochondrial results themselves establish the guilt of Hobbs or Jacoby? No.”

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is in violation of Federal Rule of Civil Procedure No. 36 which dictates, “A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying” and on the grounds that the document speaks for itself. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 48:** Admit that during the November 1, 2007 Echols defense team press conference Thomas Fedor, Echols’ DNA expert, stated as follows: “Well, it’s possible that his stepson legitimately carried Terry Hobbs’ hair to that scene, that’s certainly possible. It need not require Mr. Hobbs to be present Although on the other hand it is possible that Mr. Hobbs and not his stepson brought that hair to the scene. There really isn’t any way to be sure.”

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is vague and ambiguous and appears to reference a video of the Echols defense team’s press conference, though it is unclear which video, and on the grounds it violates Federal Rule of Civil Procedure 36 which states “A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying.” Subject to the preceding objections, Ms. Pasdar admits that she reviewed a video recording of the Echols defense team press conference on the WM3.org website prior to making the statements that form the basis of Hobbs’ complaint, but she has made reasonable inquiry and the information presently known to or readily obtainable by her is insufficient to enable her to admit or deny whether that video is the same video as the video currently on the site or to which this request refers (which would allow her to admit or deny the request); it is therefore denied.

**REQUEST FOR ADMISSION NO. 49:** Admit that on November 27, 2007 you knew of no facts that would contradict the assertion made by Thomas Fedor which is referenced in Request for Admission No. 45.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Further, as the subject assertion in an opinion, this request is improper—Ms. Pasdar cannot know what facts Fedor would consider strong or weak evidence. Subject to the preceding objections, Ms. Pasdar denies that she considers the hair evidence to be weak evidence.

**REQUEST FOR ADMISSION NO. 50:** Admit that on November 27, 2007 you knew of no facts that would contradict the assertion made by Thomas Fedor which is referenced in Request for Admission No. 48.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 51:** Admit that on page 37 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007, it states that "Dr. Peretti's best estimate of the time of death was between 1:00 a.m. and 7:00 a.m. on May 6th."

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates that "Each matter must be separately stated," and that "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying," and on the grounds that the document speaks for itself. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 52:** Admit that on November 27, 2007 you knew of no facts that would establish the time of death of Michael Moore, Christopher Byers and Steve Branch as any time other than the time of death that was the "best estimate" of Dr. Peretti.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar admits that on November 27, 2007 she knew of no facts that would establish time of death.

**REQUEST FOR ADMISSION NO. 53:** Admit that in Exhibits “A” and “D” attached hereto you state “The filing also includes a chronology of Hobbs’ activities on the night of the crimes, when he washed his clothes and sheets at odd hours for no reason other than to hide evidence from the crimes.”

**RESPONSE:** Admit that Ms. Pasdar wrote that portion of Exhibit A that begins with “I’m writing this letter today ...” through “that will be presented in the federal court hearing.” Admit that Ms. Pasdar wrote that portion of Exhibit D that begins with “I’m writing this letter today” through “that will be presented in the federal court hearing.” Deny that Ms. Pasdar wrote the remainder of Exhibits A and D. Admit that the phrase made the subject of this Request appears in Exhibits A and D.

**REQUEST FOR ADMISSION NO. 54:** Admit that on page 61 of the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007 it states that “Independent evidence indicates that Mr. Hobbs was alone or possibly with his four-year old daughter Amanda in the area of Robin Hood Hills for approximately an hour between 5:00 and 8:00 p.m. on the night of May 5,1993.”

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is in violation of Federal Rule of Civil Procedure No. 36 which dictates “A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying.” Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 55:** Admit that the statement referenced in Request for Admission No. 54 constitutes part of the factual basis for what you described as a “chronology” in the statement you made which is referenced in Request for Admission No. 53.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 56:** Admit that Exhibit “G” attached hereto is a true and accurate copy of Exhibit X which was attached to the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is in violation of Federal Rule of Civil Procedure No. 36 which dictates “A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying.” Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 57:** Admit that the last sentence which begins on page three of Exhibit "G" referenced in Request for Admission No. 56 is the factual basis for your statement which is referenced in Request for Admission No. 53.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 58:** Admit that if in fact Dr. Peretti's estimate of the time of death of Michael Moore, Christopher Byers and Steve Branch is correct, then Mr. Hobbs activities on the evening of May 5, 1993, could not have been done for "no reason other than to hide evidence from the crimes" because the crimes were committed between 1:00 a.m. and 7:00 a.m. on May 6, 1993.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and calls for speculation and expert opinion outside her area of expertise. Ms. Pasdar objects on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements which plaintiff complains. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 59:** Admit that Exhibit "H" attached hereto is a true and accurate copy of a September 10, 2008 order entered by Judge David Burnett which rejects Damien Echols argument that the DNA evidence offered by Damien Echols establishes that he is actually innocent of the crimes for which he has been convicted.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar admits that Exhibit H appears to be a copy of a September 10, 2008 order. Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny the remainder of this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 60:** Admit that on pages 5-6 of Exhibit "H", Judge Burnett states, "The Court agrees with the state the mere exclusion of the Petitioner as the source of some biological material from the crime scene (including the four particular items which he relies) neither establishes that he was not there nor that he was not a killer. On the other hand, that two other persons are not excluded from the two hairs does not place them there or make them killers."

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds the document speaks for itself. Subject to the preceding objection, Ms. Pasdar admits that the document attached as Exhibit H so states, but denies that she has knowledge of Exhibit H.

**REQUEST FOR ADMISSION NO. 61:** Admit that the WM3.org website commented on Judge Burnett's order rejecting the DNA arguments of Damien Echols.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it is vague and ambiguous. Subject to the preceding objection, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 62:** Admit that on December 5, 2008 you caused a link to the WM3.org site to be placed on the Dixie Chick's web site.

**RESPONSE:** Admit that a link to the WM3.org site was placed on the website at Ms. Pasdar's request. Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny the remainder of the request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 63:** Admit that Emily Robinson authorized you to place your letter of November 26, 2007, which is attached hereto as Exhibit "A", on the Dixie Chick's web site.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it seeks a legal conclusion.

**REQUEST FOR ADMISSION NO. 64:** Admit that Martha Siedel authorized you to place your letter of November 26, 2007, which is attached hereto as Exhibit "A", on the Dixie Chick's web page.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it seeks a legal conclusion.

**REQUEST FOR ADMISSION NO. 65:** Admit that despite the finding of Judge Burnett referenced in Request for Admission No. 60, the letter you wrote which is attached hereto as Exhibit "A" remains on the Dixie Chick's web page.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 66:** Admit that despite the finding of Judge Burnett referenced in Request for Admission No. 60, the letter you wrote which is attached hereto as Exhibit "D" remains posted on your My Space page.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 67:** Admit that the statement made by you and referenced in Request for Admission No. 53 constitutes a statement of fact in which you accuse Terry Hobbs of killing Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 68:** Admit that in Exhibits "A" and "D" you state that "DNA test results show foreign DNA-from someone other than Echols, Miskelly or Baldwin-on the penises of two of the victiMs. "

**RESPONSE:** Admit that Ms. Pasdar wrote that portion of Exhibits A and D that begin with "I'm writing this letter today ..." through "will be presented in the federal court hearing." Deny that Ms. Pasdar wrote the remainder of Exhibits A and D.

**REQUEST FOR ADMISSION NO. 69:** Admit that if the DNA which you referenced in Request for Admission No. 69 does not match Terry Hobbs, then he is not the killer of Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds it calls for speculation. Ms. Pasdar objects on the grounds the request is overly broad and neither relevant to issues in the pending litigation nor reasonably calculated to lead to the discovery of admissible evidence to the extent it seeks admissions regarding Ms. Pasdar's beliefs after the publication of the statements of which plaintiff complains. Ms. Pasdar further objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.



**REQUEST FOR ADMISSION NO. 70:** Admit that in Exhibits “A” and “D” you state that “Their killer(s) is still out there, and justice has yet to be served.”

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 71:** Admit that your use of the term “killer(s)” is a reference to Terry Hobbs when you used the term “killer(s)” in Exhibits “A” and “D”.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 72:** Admit that your use of the term “killer(s)” is not a reference to Terry Hobbs when you used the term “killer(s)” in Exhibits “A” and “D”.

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 73:** Admit that the document attached hereto as Exhibit “I” is a true and accurate printed version of a document that you relied upon when you wrote your letters where are attached hereto as Exhibits “A” and “D”.

**RESPONSE:** Admit that Ms. Pasdar wrote the portions of Exhibits A and D that begin with “I’m writing this letter today ...” through “that will be presented in the federal court hearing.” Deny that Ms. Pasdar wrote the remainder of Exhibits A and D. Deny that Exhibit I is the specific document Ms. Pasdar relied upon, but admit that Ms. Pasdar relied, in part, on a similar summary which contained much of the information set forth in Exhibit “I”.

**REQUEST FOR ADMISSION NO. 74:** Admit that Exhibit “I” is a document that is or has been posted on the website WM3.org.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 75:** Admit that Exhibit “I” appeared on the website WM3.org at the time of you answered this Request for Admission.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates, “Each matter must be separately stated.” Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 76:** Admit that at the time that you answered this Request for Admission that it is possible for you to access the document attached hereto as Exhibit "T" on the WM3.org website by clicking on a link titled "New Evidence Summary" which appears at the following internet address: <http://www.wm3.org/live/howtohelp/actionarkansas.php>.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request for admission is vague and ambiguous and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Ms. Pasdar further objects to this request on the grounds that it is an improper request in that a website is a dynamic space and a document on the site today may not be there tomorrow. Subject to the preceding objections, Ms. Pasdar admits this request as of the time these responses were prepared.

**REQUEST FOR ADMISSION NO. 77:** Admit that when the document that is attached hereto as Exhibit "T" is accessed electronically through the WM3.org website it appears on the computer being used to access the document as an Adobe PDF file.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request for admission is vague and ambiguous and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Ms. Pasdar further objects to this request on the grounds that it is an improper request in that a website is a dynamic space and a document on the site today may not be there tomorrow. Subject to the preceding objections, Ms. Pasdar admits this request as of the time these responses were prepared.

**REQUEST FOR ADMISSION NO. 78:** Admit that when the document attached hereto as Exhibit "T" is saved to a computer as an Adobe PDF file, right clicking on the electronic Adobe version of the document calls up a menu of options, one of which is titled "Document Properties".

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request for admission is vague and ambiguous and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Ms. Pasdar further objects to this request on the grounds that it is an improper request in that a website is a dynamic space and a document on the site today may not be there tomorrow and the ways that computers save files differ. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 79:** Admit that when the document properties menu item is clicked while viewing an electronic Adobe PDF version of the document attached hereto as Exhibit "I", a box appears on the computer that you are viewing which indicates that the author of the document is "eferrero" and that the document was created on November 21, 2007 at 11:45:52 AM.

**RESPONSE:** OBJECTION. Ms. Pashar objects to this request on the grounds that the request for admission is vague and ambiguous and violates Federal Rule of Civil Procedure 36 which states "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Ms. Pashar further objects to this request on the grounds that it is an improper request in that a website is a dynamic space and a document on the site today may not be there tomorrow and the way that computers save files differ. Subject to the preceding objections, Ms. Pashar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 80:** Admit that you have no factual basis to dispute that the document attached hereto as Exhibit "I" was created on November 21, 2007 at 11:45:52 AM.

**RESPONSE:** Admit that Ms. Pashar has no knowledge of when Exhibit I was created.

**REQUEST FOR ADMISSION NO. 81:** Admit that you know the identity of the person named as the author of Exhibit "I" as is referenced in Request for Admission No. 80.

**RESPONSE:** Deny.

**REQUEST FOR ADMISSION NO. 82:** Admit that on December 19, 2007, you spoke at a rally in Little Rock, AR.

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 83:** Admit that at the rally referenced in Request for Admission No. 84, you said, "It's not about opinion any more, it's not about debate, it's about science."

**RESPONSE:** Admit.

**REQUEST FOR ADMISSION NO. 84:** Admit that the "science" you referred to as referenced in Request for Admission No. 84 is the science of the use of DNA in criminal cases.

**RESPONSE:** Admit that DNA evidence is part of the science to which I referred, deny that it is the exclusive science to which I referred.

**REQUEST FOR ADMISSION NO. 85:** Admit that DNA evidence cannot prove that someone was not at a particular location; it can only prove that someone's biological material was at a particular location.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the grounds it seeks speculation and an expert opinion, outside Ms. Pasdar's area of knowledge. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 86:** Admit that the only way DNA evidence can prove that a person did not commit a crime is by proving someone else committed the crime.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the grounds it seeks speculation and an expert opinion, outside Ms. Pasdar's area of knowledge. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 87:** Admit that the finding of a hair on the shoelace used to bind one of the victims for which Terry Hobbs cannot be excluded as the donor does not place Terry Hobbs at the scene of the crime or prove that he was the killer of Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the grounds it seeks speculation and an expert opinion, outside Ms. Pasdar's area of knowledge. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 88:** Admit that you have no factual basis to dispute that DNA testing excludes Terry Hobbs as the donor of Bode # 2S04-114-15, which is referenced on page 3 of Exhibit "E" (Echols Exhibit W) and page 2 of Exhibit "F" (Echols Exhibit V) and is identified in Exhibit "F" (Echols Exhibit V) as a "Hair from C. Byers ligature".

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound, in violation of Federal Rule of Civil Procedure No. 36 which dictates, "Each matter must be separately stated," and on the grounds it seeks speculation and an expert opinion, outside Ms. Pasdar's area of knowledge. Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

**REQUEST FOR ADMISSION NO. 89:** Admit that the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus filed by Damien Echols on October 29, 2007, does not dispute that DNA testing excludes Terry Hobbs as the donor of Bode # 2S04-114-15, which is referenced on page 3 of Exhibit "E" (Echols Exhibit W) and page 2 of Exhibit "F" (Echols Exhibit V) and is identified in Exhibit "F" (Echols Exhibit V) as a "Hair from C. Byers ligature".

**RESPONSE:** OBJECTION. Ms. Pasdar objects to this request on the grounds that the request is compound and in violation of Federal Rule of Civil Procedure No. 36 which dictates that "Each matter must be separately stated" and that "A request to admit the genuineness of a document must be accompanied by a copy of the document unless it is, or has been, otherwise furnished or made available for inspection and copying." Subject to the preceding objections, Ms. Pasdar has made reasonable inquiry and the information known or readily obtainable by her is insufficient to enable her to admit or deny this request; it is therefore denied.

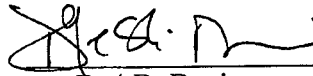
**REQUEST FOR ADMISSION NO. 90:** Admit that with respect to the statement made by you that is referenced in Request for Admission No. 53, that the word "crimes" appears twice in your statement, and that the criminal acts that you are referring to with each use of the word "crimes" is the murder of Michael Moore, Christopher Byers and Steve Branch.

**RESPONSE:** Admit that Ms. Pasdar wrote that portion of Exhibit A that begins with "I am writing this letter today ..." and stops with the phrase: "that will be presented in the federal court hearing." Deny that Ms. Pasdar wrote the remainder of Exhibit A. Admit that "crimes" does appear twice and does refer to the murder of Moore, Byers and Branch.

**REQUEST FOR ADMISSION NO. 91:** Admit that with respect to the statement made by you that is referenced in Request for Admission No. 53, that the word “filing” appears in your statement, and that when you used the word “filing” you were referring to the Second Amended Petition for Writ of Habeas Corpus; the Memorandum of Points and Authorities in Support of Second Amended Petition for Writ of Habeas Corpus; and the exhibits attached thereto that were filed by Damien Echols on October 29, 2007.

**RESPONSE:** Deny.

Respectfully submitted,



---

Dan D. Davison  
Texas State Bar No. 05590900  
Admitted Pro Hace Vice  
D'Lesli Davis  
Texas State Bar No. 05479459  
Admitted Pro Hace Vice  
Fulbright & Jaworski L.L.P.  
2200 Ross Avenue, Suite 2800  
Dallas, Texas 75201-2784  
Telephone: (214) 855-8000  
Facsimile: (713) 855-8200

John E. Moore  
Huckabay Munson, Rowlett and Moore  
Regions Center  
400 W. Capital, Suite 1900  
Little Rock, Arkansas 72201  
Telephone: (501) 374-6536  
Facsimile: (501) 374-5906

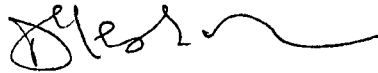
COUNSEL FOR DEFENDANT,  
NATALIE PASDAR.

**CERTIFICATE OF SERVICE**

This discovery pleading has been served in compliance with the Federal Rules of Civil Procedure on March 24, 2009.

J. Cody Hiland  
557 Locust Avenue  
Conway, Arkansas 72034

Bob Wellenberger  
Thompson, Coe, Cousins & Irons, L.L.P.  
700 North Pearl Street  
Plaza of the Americas, Twenty-Fifth Floor  
Dallas, Texas 75201-2832



---

D'Lesli Davis