

Exhibit OO

1 **BOUTIN JONES INC.**
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5 Attorneys for Defendant and Cross-complainant,
The California State Grange and Defendants
6 Jon Luvaas, Gerald Chernoff, Damian Parr,
Takashi Yogi, Kathy Bergeron, and Bill Thomas
7

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SACRAMENTO**

10 THE NATIONAL GRANGE OF THE ORDER)
OF PATRONS OF HUSBANDRY, a)
11 Washington D.C. nonprofit corporation,)

12 Plaintiff,

13 vs.

14 THE CALIFORNIA STATE GRANGE, a)
California nonprofit corporation, and ROBERT)
15 McFARLAND, JOHN LUVAAS, GERALD)
16 CHERNOFF and DAMIAN PARR,)

17 Defendant.
18

19 AND RELATED CROSS-ACTIONS.
20

Case No.: 34-2012-00130439

KATHY BERGERON'S RESPONSE TO
PLAINTIFFS-IN-INTERVENTION'S
SPECIAL INTERROGATORIES,
SET ONE

21 PROPOUNDING PARTY: Plaintiffs-in-Intervention

22 RESPONDING PARTY: Kathy Bergeron

23 SET NUMBER: One
24

25 **GENERAL OBJECTIONS**

26 Kathy Bergeron ("Responding Party") objects to the special interrogatories and to each
27 individual interrogatory on the following grounds:
28

1 1. Responding Party objects to each interrogatory to the extent that it seeks to impose
2 upon Responding Party an obligation to respond greater than that required by Code of Civil
3 Procedure § 2030.010 et seq.

4 2. Responding Party objects to each interrogatory to the extent that it seeks
5 information protected by the attorney-client privilege and/or the attorney work product doctrine,
6 including, but not limited to, the joint defense privilege.

7 3. Responding Party objects to each interrogatory to the extent that it seeks
8 information that is neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 4. Responding Party objects to each interrogatory to the extent it is vague, ambiguous,
11 confusing, overbroad, contains subparts, and/or is compound, conjunctive and/or disjunctive.

12 5. Responding Party objects to each interrogatory to the extent it is unreasonably
13 cumulative and duplicative to the extent that it seeks information otherwise obtained from
14 Responding Party or others in this lawsuit.

15 6. Responding Party objects to each interrogatory to the extent that it seeks
16 information equally available to Propounding Party and Responding Party.

17 7. Responding Party objects to each interrogatory to the extent that responding would
18 be oppressive and/or unduly burdensome.

19 8. These responses are made solely for the purpose of this action. Each response is
20 subject to all appropriate objections that would require the exclusion of any statement contained in
21 any response if the interrogatory was made or if the response was given by a witness present and
22 testifying in court. All objections are reserved and may be interposed at the time of trial.

23 9. Responding Party has not yet completed an investigation of the facts relating to this
24 action, discovery in this action, nor preparation for trial in this action. Consequently, the following
25 responses to individual interrogatories are based on information presently available to Responding
26 Party and are given without prejudice to the right of Responding Party to produce at the time of
27 trial any and all subsequently discovered facts and evidence relating to the proof of presently
28

1 known material facts, and to produce all evidence, whenever discovered, relating to the proof of
2 subsequently discovered material facts.

3 10. The fact that Responding Party has responded to part or all of any specific
4 interrogatory is not intended and shall not be construed to be a waiver by Responding Party of all
5 or any part of any objection to any specific interrogatory.

6 **SPECIAL INTERROGATORIES, SET ONE**

7 **SPECIAL INTERROGATORY NO. 1:**

8 IDENTIFY all Bylaws or other rules applicable to the CALIFORNIA STATE GRANGE on
9 the following dates: (a) January 1, 2012; (b) September 16, 2012; (c) January 1, 2013; (d) April 4,
10 2013; (e) October 1, 2013; and (f) December 31, 2013.

11 For the purposes of these interrogatories, the term "IDENTIFY," when used in reference to
12 a DOCUMENTS, shall mean to describe the DOCUMENTS, its author(s), recipient(s), and date
13 prepared. Alternatively, if the responsive DOCUMENTS has been produced and Bates-stamped,
14 "IDENTIFY" shall mean to state the Bates-number(s) of the DOCUMENTS(S).

15 For the purposes of these Interrogatories, the term "DOCUMENTS" or "DOCUMENTS"
16 shall mean all writings as defined by California Evidence Code section 250, as well as any other
17 kind of printed, recorded, written, graphic, or photographic matter (including tape recordings, either
18 audio or video) as well as any information maintained by electronic data processing systems,
19 including all non-identical copies of such information, and any electronically stored information
20 such as e-mails and the like.

21 For the purposes of these Interrogatories, the term "CALIFORNIA STATE GRANGE"
22 shall refer to the division of the National Grange chartered by the National Grange in 1873,
23 including the California non-profit corporation called "California State Grange" incorporated in
24 1946 and the California non-profit corporation called "California Grange Foundation" incorporated
25 in 1992.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

27 Responding Party objects that the interrogatory contains subparts and is compound,
28 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad,

1 vague and ambiguous with respect to the definitions of the terms "author(s)" and "recipient(s)"
2 within the definition of the term " IDENTIFY," and the definition of the term " CALIFORNIA
3 STATE GRANGE." Both Responding Party and Propounding Party claim to fall within the
4 definition of CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE"
5 is compound, conjunctive, and/or disjunctive as defined. Furthermore, the California State
6 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
7 The term "Bylaws or other applicable rules" are vague and ambiguous as well as overbroad. The
8 term "applicable to" in this context is vague and ambiguous. Responding Party further objects to
9 the interrogatory to the extent it seeks information protected by the attorney-client privilege and/or
10 the attorney work product doctrine.

11 **SPECIAL INTERROGATORY NO. 2:**

12 State the date(s) that YOU (a) ceased to be a member of the Order of Patrons of Husbandry;
13 (b) ceased to be affiliated with the Order of Patrons of Husbandry; and (c) ceased to be a member of
14 any organization affiliated with the National Grange of the Order of Patrons of Husbandry.

15 For the purposes of these Interrogatories, the terms "YOU" and "YOUR" shall mean
16 Defendant Kathy Bergeron, her attorneys, her present and former agents, and anyone acting on her
17 behalf.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

19 Responding Party objects that the interrogatory contains subparts and is compound,
20 conjunctive, and/or disjunctive. Responding Party objects that the definition of "YOU" is
21 overbroad, compound, conjunctive, and/or disjunctive as defined. Responding Party objects to the
22 word "affiliated" as vague and ambiguous. Without waiving any objection, Responding Party
23 answers for herself only as follows: Responding Party is currently a member of the Phoneix
24 Grange in Phoneix, Oregon.

25 **SPECIAL INTERROGATORY NO. 3:**

26 IDENTIFY all NATIONAL SESSIONS of the National Grange to which the CALIFORNIA
27 STATE GRANGE sent a representative since 1873.

1 For the purposes of these Interrogatories, the term "NATIONAL SESSION" shall refer to
2 the annual meeting or "convention" of the National Grange.

3 For purposes of these Interrogatories, the term "IDENTIFY" with respect to a date shall
4 mean to state the year and to specify a range of dates, if applicable.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

6 Responding Party objects that the interrogatory contains subparts and is compound,
7 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad, vague
8 and ambiguous with respect to the definition of the term "CALIFORNIA STATE GRANGE."
9 Both Responding Party and Propounding Party claim to fall within the definition of CALIFORNIA
10 STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive,
11 and/or disjunctive as defined. Furthermore, the California State Grange, a California corporation, is
12 not and never has been a legal "division" of National Grange. Responding Party further objects
13 that the interrogatory is vastly overbroad and unduly burdensome as to time period and seeks
14 information that is not relevant or likely to lead to the discovery of admissible evidence.

15 Without waiving any objections, Responding Party responds as follows: it is Responding
16 Party's understanding that California State Grange, a California corporation, sent representatives to
17 the National Grange convention for most years leading up to the suspension and then revocation of
18 California State Grange's charter by National Grange.

19 **SPECIAL INTERROGATORY NO. 4:**

20 IDENTIFY all real property acquired, owned, or held by the CALIFORNIA STATE
21 GRANGE since its formation in 1873.

22 For purposes of these Interrogatories, the term "IDENTIFY" with respect to real property
23 shall mean to state the physical address of the property, the date of its acquisition, the date of its
24 sale (if any), the name in which title was and/or is held, the amount of the mortgage on the property
25 (if any), and date the property was mortgaged (if it was).

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

27 Responding Party objects that the interrogatory seeks information that is confidential and
28 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding

1 Party objects that the interrogatory contains subparts and is compound, conjunctive, and/or
2 disjunctive. Responding Party objects in that the interrogatory impermissibly seeks financial
3 condition discovery. Responding Party objects that the interrogatory is overbroad, vague and
4 ambiguous with respect to the definition of the term "CALIFORNIA STATE GRANGE." Both
5 Responding Party and Propounding Party claim to fall within the definition of CALIFORNIA
6 STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive,
7 and/or disjunctive as defined. Furthermore, the California State Grange, a California corporation,
8 is not and never has been a legal "division" of National Grange. Responding Party further objects
9 that the interrogatory is vastly overbroad and unduly burdensome as to time period as it seeks over
10 100 years of information and seeks information that is not relevant nor likely to lead to the
11 discovery of admissible evidence.

12 **SPECIAL INTERROGATORY NO. 5:**

13 IDENTIFY all financial accounts, including but not limited to bank accounts, brokerage
14 accounts, trust accounts, and mutual funds, held by the CALIFORNIA STATE GRANGE on
15 January 1, 2012.

16 For purposes of these Interrogatories, the term "IDENTIFY" with respect to financial
17 accounts shall mean to state the financial institution at which the account is held, the name of the
18 account holder, the account number, the names of all individuals entitled to deposit to or transfer or
19 withdraw funds from the account, the account balance as of January 1, 2012, the current status of
20 the account, and the account balance stated in the most recent statement of account.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

22 Responding Party objects that the interrogatory seeks information that is confidential and protected
23 by the right to privacy in Article I, section 1 of the California Constitution. Responding Party
24 objects in that the interrogatory impermissibly seeks financial condition discovery. Responding
25 Party objects that the interrogatory contains subparts and is compound, conjunctive, and/or
26 disjunctive. Responding Party objects that the interrogatory is overbroad, vague and ambiguous
27 with respect to the definition of the term "CALIFORNIA STATE GRANGE." Both Responding
28 Party and Propounding Party claim to fall within the definition of CALIFORNIA STATE

1 GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or
2 disjunctive as defined. Furthermore, the California State Grange, a California corporation, is not
3 and never has been a legal "division" of National Grange. Responding Party further objects that the
4 interrogatory seeks information that is not relevant or likely to lead to the discovery of admissible
5 evidence.

6 Without waiving any objection, Responding Party is without information sufficient to
7 respond fully to this interrogatory.

8 **SPECIAL INTERROGATORY NO. 6:**

9 IDENTIFY all real and personal property of the CALIFORNIA STATE GRANGE that
10 YOU contend was not donated to be used for the general purposes of the Order of Patrons of
11 Husbandry.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Responding Party objects that the interrogatory seeks information that is confidential and
14 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
15 Party objects in that the interrogatory impermissibly seeks financial condition discovery.
16 Responding Party objects that the interrogatory contains subparts and is compound, conjunctive,
17 and/or disjunctive. Responding Party objects that the interrogatory is overbroad, confusing, vague
18 and ambiguous with respect to the phrase "was not donated to be used for the general purposes of
19 the Order of Patrons of Husbandry." Responding Party objects that the interrogatory is overbroad,
20 vague and ambiguous with respect to the definition of the term "CALIFORNIA STATE
21 GRANGE." Both Responding Party and Propounding Party claim to fall within the definition of
22 CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound,
23 conjunctive, and/or disjunctive as defined as it refers to three separate entities. Furthermore, the
24 California State Grange, a California corporation, is not and never has been a legal "division" of
25 National Grange. Responding Party objects that the interrogatory is unduly burdensome.
26 Responding Party objects to the interrogatory to the extent it seeks information protected by the
27 attorney/client privilege, the attorney work product doctrine, and/or requires Responding Party to
28

1 draw legal conclusions. Responding Party objects that the interrogatory seeks information not
2 within Responding Party' s personal knowledge and seeks an analysis of the source of literally
3 every asset of the California State Grange acquired since 1873.

4 DATED: January 23, 2015

BOUTIN JONES INC.

Gabrielle D. Boutin

For

Daniel S. Stouder

By:


Robert D. Swanson
Daniel S. Stouder

Attorneys for Defendant and Cross-complainant,
The California State Grange and Defendants
Jon Luvaas, Gerald Chernoff, Damian Parr,
Takashi Yogi, Kathy Bergeron, and Bill Thomas

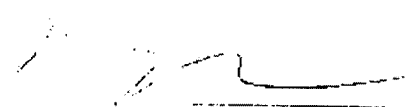
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VERIFICATION

I, Kathy Bergeron, am a party to the above titled action. I have read the foregoing
**KATHY BERGERON'S RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S SPECIAL
INTERROGATORIES, SET ONE** and know its contents. The matters stated in the document
described above are true of my own knowledge and belief except as to those matters stated on
information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the
foregoing is true and correct.

EXECUTED on 17th day of January 2018 at Sacramento, California.


Kathy Bergeron

PROOF OF SERVICE
[CCP §1013, 1013a]

CASE: The National Grange v. The California State Grange, et al
COURT/CASE NO.: Sacramento Superior Court Case No.: 34-2012-00130439

The undersigned declares:

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action; I am employed by Boutin Jones Inc., 555 Capitol Mall, Suite 1500, Sacramento, California 95814-4603.

On this date I served the foregoing document described as: **KATHY BERGERON'S RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S SPECIAL INTERROGATORIES, SET ONE** on all parties in said action by causing a true copy thereof to be

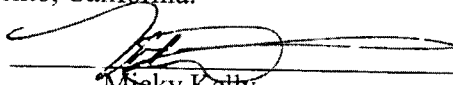
- ☐ Transmitted Via Facsimile to the fax number set forth below before 5:00 p.m. on this date
- ☒ Placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail, as indicated below
- ☒ Sent Via Overnight Delivery by depositing in/at the appropriate facility for said service, as indicated below

addressed to the person(s) on whom it is to be served, whose name(s) and address(es) are listed below:

Attorneys for Plaintiff: Martin N. Jensen, Esq. mjensen@porterscott.com Thomas L. Riordan, Esq. triordan@porterscott.com Porter Scott 350 University Ave., Suite 200 Sacramento, CA 95825 Telephone: 916-929-1481 Fax: 916-927-3706 BY US MAIL	Attorneys for Defendant Robert McFarland: Mark Ellis, Esq. mellis@ellislawgrp.com Ellis Law Group 740 University Ave., Suite 100 Sacramento, CA 95814 Telephone: 916-283-8820 Fax: 916-283-8821 BY US MAIL
Attorneys for Cross-defendants Martha Stefenoni and Shirley Baker Michael A. Farbstein, Esq. maf@farbstein.com Maggie W. Trinh, Esq. mwt@farbstein.com Farbstein & Blackman 411 Borel Avenue, Suite 425 San Mateo, CA 94402-3518 Telephone: (650) 544-6200 Fax: (650) 554-6240 BY US MAIL	Attorneys for Plaintiffs-in-Intervention The California State Grange and Ed Komski Jeffrey D. Skinner jkskinner@schiffhardin.com SCHIFF HARDIN LLP 901 K Street NW, Suite 700 Washington, DC 20001 Telephone: (202) 778-6400 Fax: (202) 778-6460 BY OVERNIGHT DELIVERY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on January 23, 2015, at Sacramento, California.


Micky Kelly

KATHY BERGERON'S RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S SPECIAL INTERROGATORIES,
SET ONE

Exhibit PP

1 **BOUTIN JONES INC.**

Robert D. Swanson SBN 162816

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3 Sacramento, CA 95814-4603

Telephone: (916) 321-4444

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8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SACRAMENTO**

10 THE NATIONAL GRANGE OF THE ORDER)
OF PATRONS OF HUSBANDRY, a)
11 Washington D.C. nonprofit corporation,)

12 Plaintiff,

13 vs.

14 THE CALIFORNIA STATE GRANGE, a)
California nonprofit corporation, and ROBERT)
15 McFARLAND, JOHN LUVAAS, GERALD)
16 CHERNOFF and DAMIAN PARR,)

17 Defendant.)
18)
19)

20 AND RELATED CROSS-ACTIONS.)
21)
22)
23)
24)

Case No.: 34-2012-00130439

**KATHY BERGERON'S RESPONSE TO
PLAINTIFFS-IN-INTERVENTION'S
REQUESTS FOR ADMISSION, SET
ONE**

21 PROPOUNDING PARTY: Plaintiffs-in-Intervention

22 RESPONDING PARTY: Kathy Bergeron

23 SET NUMBER: One

24
25 **GENERAL OBJECTIONS**

26 Kathy Bergeron ("Responding Party") objects to the requests and to each individual request
27 on the following grounds:
28

1 1. The Responding Party objects to each request to the extent that it seeks to impose
2 upon the Responding Party an obligation to respond greater than that required by Code of Civil
3 Procedure § 2033.010 et seq.

4 2. Responding Party objects to each request to the extent that it seeks information
5 protected by the attorney-client privilege and/or the attorney work product doctrine, including, but
6 not limited to, the joint defense privilege.

7 3. The Responding Party objects to each request to the extent that it seeks information
8 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 4. Responding Party objects to each request to the extent it is vague, ambiguous,
10 confusing, overbroad, contains subparts, and/or is compound, conjunctive and/or disjunctive.

11 5. Responding Party objects to each request to the extent that responding would be
12 oppressive and/or unduly burdensome.

13 6. These responses are made solely for the purpose of this action. Each response is
14 subject to all appropriate objections that would require the exclusion of any statement contained in
15 any response if the request was made or if the response was given by a witness present and
16 testifying in court. All objections are reserved and may be interposed at the time of trial.

17 7. The Responding Party has not yet completed investigation of the facts relating to
18 this action, discovery in this action; nor preparation for trial in this action. Consequently, the
19 following responses to individual requests are based on information presently available to the
20 Responding Party and are given without prejudice to the right of the Responding Party to produce
21 at the time of trial any and all subsequently discovered evidence relating to the proof of presently
22 known material facts, and to produce all evidence, whenever discovered, relating to the proof of
23 subsequently discovered material facts.

24 8. The fact that the Responding Party has responded to part or all of any specific
25 request is not intended and shall not be construed to be a waiver by the Responding Party of all or
26 any part of any objection to any specific request.

27
28

1 **REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1:**

3 Admit that YOU are not a member of the Order of Patrons of Husbandry.

4 For the purposes of these Requests for Admission, the terms "YOU" and "YOUR" shall
5 mean Defendant Kathy Bergeron, her attorneys, her present and former agents, and anyone acting
6 on her behalf.

7 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 1:**

8 Responding Party objects that the request is vague and ambiguous as to time period and as
9 to the phrase "member of the Order of Patrons of Husbandry." "YOU" is overbroad, compound,
10 conjunctive, and/or disjunctive as defined.

11 Without waiving any objections, Responding Party responds: Deny.

12 **REQUEST FOR ADMISSION NO. 2:**

13 Admit that YOU are not a member of any organization affiliated with the Order of Patrons
14 of Husbandry.

15 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 2:**

16 Responding Party objects that the request is vague and ambiguous as to time period and as
17 to the terms "member" and "affiliated with." "YOU" is overbroad, compound, conjunctive, and/or
18 disjunctive as defined.

19 Without waiving any objections, Responding Party responds: Deny.

20 **REQUEST FOR ADMISSION NO. 3:**

21 Admit that YOU are not a member of any organization affiliated with the National Grange
22 of the Order of Patrons of Husbandry.

23 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 3:**

24 Responding Party objects that the request is vague and ambiguous as to time period and as
25 to the terms "member" and "affiliated with." "YOU" is overbroad, compound, conjunctive, and/or
26 disjunctive as defined.

27 Without waiving any objections, Responding Party responds: Deny.

1 **REQUEST FOR ADMISSION NO. 4:**

2 Admit that YOU hold yourself out as a member of the Executive Committee of the
3 "California State Grange."

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 4:**

5 Responding Party objects that the request is vague and ambiguous as to the phrase "Hold
6 yourself out as." "YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

7 Without waiving any objections, Responding Party responds: Admit.

8 **REQUEST FOR ADMISSION NO. 5:**

9 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to April 5,
10 2013.

11 For the purposes of these Requests for Admission, the term "CALIFORNIA STATE
12 GRANGE" shall refer to the division of the National Grange chartered by the National Grange in
13 1873, including the California non-profit corporation called "California State Grange" incorporated
14 in 1946 and the California non-profit corporation called "California Grange Foundation"
15 incorporated in 1992.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 5:**

17 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
18 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
19 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
20 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
21 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
22 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
23 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

24 Without waiving any objections, Responding Party responds only as to California State
25 Grange, a California corporation: Admit.

26 **REQUEST FOR ADMISSION NO. 6:**

27 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to
28 April 5, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 6:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
7 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
8 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

9 Without waiving any objections, Responding Party responds only as to California State
10 Grange, a California corporation: Admit.

11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations
13 prior to April 5, 2013.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 7:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
19 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
20 objects that the term "charitable monetary donations" is vague and ambiguous. Furthermore, the
21 California State Grange, a California corporation, is not and never has been a legal "division" of
22 National Grange.

23 Without waiving any objections, Responding Party responds: Responding Party is without
24 sufficient personal information to admit or deny the request.

25 **REQUEST FOR ADMISSION NO. 8:**

26 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary
27 donations prior to April 5, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 8:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
7 objects that the term "charitable non-monetary donations" is vague and ambiguous. Furthermore,
8 the California State Grange, a California corporation, is not and never has been a legal "division"
9 of National Grange.

10 Without waiving any objections, Responding Party responds: Responding Party is without
11 sufficient personal information to admit or deny the request.

12 **REQUEST FOR ADMISSION NO. 9:**

13 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to 1946.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 9:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
19 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
20 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
21 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

22 Without waiving any objections, Responding Party responds: Responding Party is without
23 sufficient personal information to admit or deny the request.

24 **REQUEST FOR ADMISSION NO. 10:**

25 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to 1946.

26 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 10:**

27 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
28 vague and ambiguous, in that both the Defendant in this action and the Propounding Party

1 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
2 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
3 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
4 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
5 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

6 Without waiving any objections, Responding Party responds: Responding Party is without
7 sufficient personal information to admit or deny the request.

8 **REQUEST FOR ADMISSION NO. 11:**

9 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations
10 prior to 1946.

11 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 11:**

12 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
13 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
14 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
15 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
16 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
17 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
18 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
19 Responding Party objects that the term "charitable monetary donations" is vague and ambiguous

20 Without waiving any objections, Responding Party responds: Responding Party is without
21 sufficient personal information to admit or deny the request.

22 **REQUEST FOR ADMISSION NO. 12:**

23 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary
24 donations prior to 1946.

25 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 12:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
27 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
28 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does

1 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
2 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
3 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
4 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
5 Responding Party objects that the term "charitable non-monetary donations" is vague and
6 ambiguous

7 Without waiving any objections, Responding Party responds: Responding Party is without
8 sufficient personal information to admit or deny the request.

9 **REQUEST FOR ADMISSION NO. 13:**

10 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
11 Grange prior to April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 13:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
14 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
15 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
16 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
17 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
18 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
19 State Grange, a California corporation, is not and never has been a legal "division" of National
20 Grange.

21 Without waiving any objections, Responding Party responds only as to California State
22 Grange, a California corporation: Deny.

23 **REQUEST FOR ADMISSION NO. 14:**

24 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
25 Grange prior to September 17, 2012.

26 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 14:**

27 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
28 vague and ambiguous, in that both the Defendant in this action and the Propounding Party

1 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
2 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
3 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
4 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
5 State Grange, a California corporation, is not and never has been a legal "division" of National
6 Grange.

7 Without waiving any objections, Responding Party responds only as to of California State
8 Grange, a California corporation: Deny.

9 **REQUEST FOR ADMISSION NO. 15:**

10 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
11 Grange prior to January 1, 2012

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 15:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
14 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
15 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
16 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
17 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
18 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
19 State Grange, a California corporation, is not and never has been a legal "division" of National
20 Grange.

21 Without waiving any objections, Responding Party responds only as to California State
22 Grange, a California corporation: Deny.

23 **REQUEST FOR ADMISSION NO. 16:**

24 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
25 Grange prior to 1946.

26 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 16:**

27 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
28 vague and ambiguous, in that both the Defendant in this action and the Propounding Party

1 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
2 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
3 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
4 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
5 State Grange, a California corporation, is not and never has been a legal "division" of National
6 Grange.

7 Without waiving any objections, Responding Party responds only as to California State
8 Grange, a California corporation: Deny.

9 **REQUEST FOR ADMISSION NO. 17:**

10 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to April 5,
11 2013, were to be used for the general purposes of the Order of Patrons of Husbandry within the
12 State of California.

13 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 17:**

14 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
15 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
16 Intervention) claim to be the "California State Grange," and Responding Party does not know
17 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
18 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further
19 objects that the phrase "were to be used for the general purposes of the Order of Patrons of
20 Husbandry within the State of California" is vague and ambiguous.

21 **REQUEST FOR ADMISSION NO. 18:**

22 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to
23 September 17, 2012, were to be used for the general purposes of the Order of Patrons of Husbandry
24 within the State of California.

25 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 18:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
27 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
28 Intervention) claim to be the "California State Grange," and Responding Party does not know

1 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
2 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further
3 objects that the phrase "were to be used for the general purposes of the Order of Patrons of
4 Husbandry within the State of California" is vague and ambiguous. Furthermore, the California
5 State Grange, a California corporation, is not and never has been a legal "division" of National
6 Grange.

7 Without waiving any objections, Responding Party responds: Responding Party is without
8 sufficient personal information to admit or deny the request.

9 **REQUEST FOR ADMISSION NO. 19:**

10 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to
11 January 1, 2012, were to be used for the general purposes of the Order of Patrons of Husbandry
12 within the State of California.

13 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 19:**

14 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
15 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
16 Intervention) claim to be the "California State Grange," and Responding Party does not know
17 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
18 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further
19 objects that the phrase "were to be used for the general purposes of the Order of Patrons of
20 Husbandry within the State of California" is vague and ambiguous. Furthermore, the California
21 State Grange, a California corporation, is not and never has been a legal "division" of National
22 Grange.

23 Without waiving any objections, Responding Party responds: Responding Party is without
24 sufficient personal information to admit or deny the request.

25 **REQUEST FOR ADMISSION NO. 20:**

26 Admit that the organization YOU purport to be the "California State Grange" has collected
27 dues from Pomona, Subordinate, and Junior Granges in California since April 5, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 20:**

2 Responding Party objects that the phrase “has collected dues...since April 5, 2013” is
3 vague and ambiguous. Responding Party objects that the term “the organization YOU purport to
4 be the ‘California State Grange’” is vague, ambiguous, and unintelligible. Compound,
5 conjunctive, and/or disjunctive. “YOU” is overbroad, compound, conjunctive, and/or disjunctive
6 as defined.

7 Without waiving any objections, Responding Party responds: Admit as to California State
8 Grange, a California corporation.

9 **REQUEST FOR ADMISSION NO. 21:**

10 Admit that the organization YOU purport to be the “California State Grange” has not paid
11 any dues to the National Grange since April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 21:**

13 Responding Party objects that the term “the organization YOU purport to be the ‘California
14 State Grange’” is vague, ambiguous, and unintelligible. “YOU” is overbroad, compound,
15 conjunctive, and/or disjunctive as defined.

16 Without waiving any objections, Responding Party responds on behalf of herself only:
17 Admit as to California State Grange, a California corporation.

18 **REQUEST FOR ADMISSION NO. 22:**

19 Admit that the CALIFORNIA STATE GRANGE was formed in 1873.

20 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 22:**

21 Responding Party objects that the definition of “CALIFORNIA STATE GRANGE” is
22 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
23 (Plaintiff-in-Intervention) claim to be the “California State Grange,” and Responding Party does
24 not know Propounding Party’s contentions as to its own origins. The term “CALIFORNIA
25 STATE GRANGE” is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
26 California State Grange, a California corporation, is not and never has been a legal “division” of
27 National Grange.

1 Without waiving any objections, Responding Party responds: Responding Party is without
2 sufficient personal information to admit or deny the request.

3 **REQUEST FOR ADMISSION NO. 23:**

4 Admit that the National Grange issued a Charter to the CALIFORNIA STATE GRANGE in
5 1873.

6 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 23:**

7 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
8 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
9 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
10 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
11 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
12 California State Grange, a California corporation, is not and never has been a legal "division" of
13 National Grange.

14 Without waiving any objections, Responding Party responds: Responding Party is without
15 sufficient personal information to admit or deny the request.

16 **REQUEST FOR ADMISSION NO. 24:**

17 Admit that the National Grange suspended the Charter of the CALIFORNIA STATE
18 GRANGE on September 17, 2012.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 24:**

20 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
21 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
22 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
23 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
24 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
25 California State Grange, a California corporation, is not and never has been a legal "division" of
26 National Grange.

27 Without waiving any objections, Responding Party responds only as to California State
28 Grange, a California corporation: Admit.

1 **REQUEST FOR ADMISSION NO. 25:**

2 Admit that the National Grange revoked the Charter of the CALIFORNIA STATE
3 GRANGE on April 5, 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 25:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
10 California State Grange, a California corporation, is not and never has been a legal "division" of
11 National Grange.

12 Without waiving any objections, Responding Party responds only as to California State
13 Grange, a California corporation: Admit.

14 **REQUEST FOR ADMISSION NO. 26:**

15 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
16 SESSION of the National Grange in 1986.

17 For the purposes of these Requests for Admission, the term "NATIONAL SESSION" shall
18 refer to the annual meeting or convention of the National Grange.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 26:**

20 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
21 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
22 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
23 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
24 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
25 California State Grange, a California corporation, is not and never has been a legal "division" of
26 National Grange.

27 Without waiving any objections, Responding Party responds: Responding Party is without
28 sufficient personal information to admit or deny the request.

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
3 SESSION of the National Grange in 1996.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 27:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
10 California State Grange, a California corporation, is not and never has been a legal "division" of
11 National Grange.

12 Without waiving any objections, Responding Party responds: Responding Party is without
13 sufficient personal information to admit or deny the request.

14 **REQUEST FOR ADMISSION NO. 28:**

15 Admit that the CALIFORNIA STATE GRANGE sent a representative to every NATIONAL
16 SESSION of the National Grange between 1874 and 2011.

17 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 28:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
19 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
20 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
21 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
22 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
23 California State Grange, a California corporation, is not and never has been a legal "division" of
24 National Grange.

25 Without waiving any objections, Responding Party responds: Responding Party is without
26 sufficient personal information to admit or deny the request.

27
28

1 **REQUEST FOR ADMISSION NO. 29:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
3 STATE GRANGE on January 1, 2012.

4 For the purposes of these Requests for Admission, the term "DIGEST OF LAWS" shall
5 refer to Digest of Laws of the Order of Patrons of Husbandry adopted and proclaimed by the
6 National Grange.

7 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 29:**

8 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
9 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
10 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
11 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
12 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
13 California State Grange, a California corporation, is not and never has been a legal "division" of
14 National Grange.

15 Without waiving any objections, Responding Party responds: Responding Party is without
16 sufficient personal information to admit or deny the request.

17 **REQUEST FOR ADMISSION NO. 30:**

18 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
19 STATE GRANGE on September 16, 2012.

20 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 30:**

21 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
22 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
23 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
24 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
25 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
26 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
27 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
28

1 DIGEST OF LAWS” is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
2 context.

3 **REQUEST FOR ADMISSION NO. 31:**

4 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
5 STATE GRANGE on January 1, 2013.

6 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 31:**

7 Responding Party objects that the definition of “CALIFORNIA STATE GRANGE” is
8 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
9 (Plaintiff-in-Intervention) claim to be the “California State Grange,” and Responding Party does
10 not know Propounding Party’s contentions as to its own origins. Furthermore, the California State
11 Grange, a California corporation, is not and never has been a legal “division” of National Grange.
12 Responding Party further objects that the term “applied to the CALIFORNIA STATE GRANGE”
13 is overbroad and vague and ambiguous. Responding Party objects that “the rules set forth in the
14 DIGEST OF LAWS” is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
15 context.

16 **REQUEST FOR ADMISSION NO. 32:**

17 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
18 STATE GRANGE on April 4, 2013.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 32:**

20 Responding Party objects that the definition of “CALIFORNIA STATE GRANGE” is
21 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
22 (Plaintiff-in-Intervention) claim to be the “California State Grange,” and Responding Party does
23 not know Propounding Party’s contentions as to its own origins. Furthermore, the California State
24 Grange, a California corporation, is not and never has been a legal “division” of National Grange.
25 Responding Party further objects that the term “applied to the CALIFORNIA STATE GRANGE”
26 is overbroad and vague and ambiguous. Responding Party objects that “the rules set forth in the
27 DIGEST OF LAWS” is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
28 context.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
3 STATE GRANGE on October 1, 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 33:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
9 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
10 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
11 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
12 DIGEST OF LAWS" is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
13 context.

14 **REQUEST FOR ADMISSION NO. 34:**

15 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
16 STATE GRANGE on December 31, 2013.

17 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 34:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
19 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
20 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
21 not know Propounding Party's contentions as to its own origins. Responding Party further objects
22 that the term "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and
23 ambiguous. The term "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or
24 disjunctive as defined. Object to the extent this calls for a legal conclusion.

25 **REQUEST FOR ADMISSION NO. 35:**

26 Admit that the CALIFORNIA STATE GRANGE sent annual and quarterly reports to the
27 National Grange prior to April 5, 2013.

28

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 35:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
7 California State Grange, a California corporation, is not and never has been a legal "division" of
8 National Grange. Overbroad and not limited in temporal scope.

9 Without waiving any objections, Responding Party responds only as to California State
10 Grange, a California corporation: Admit.

11 **REQUEST FOR ADMISSION NO. 36:**

12 Admit that the CALIFORNIA STATE GRANGE participated in the Grange Insurance
13 Association prior to April 5, 2013.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 36:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. Responding Party objects to the
19 term "participated in" as vague and ambiguous. The term "CALIFORNIA STATE GRANGE" is
20 compound, conjunctive, and/or disjunctive as defined. Furthermore, the California State Grange, a
21 California corporation, is not and never has been a legal "division" of National Grange.
22 Overbroad and not limited in temporal scope.

23 Without waiving any objections, Responding Party responds only as to California State
24 Grange, a California corporation: Admit.

25 **REQUEST FOR ADMISSION NO. 37:**

26 Admit that the CALIFORNIA STATE GRANGE paid dues to the National Grange prior to
27 April 5, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 37:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
7 California State Grange, a California corporation, is not and never has been a legal "division" of
8 National Grange. Overbroad and not limited in temporal scope.

9 Without waiving any objections, Responding Party responds only as to California State
10 Grange, a California corporation: Admit.

11 **REQUEST FOR ADMISSION NO. 38:**

12 Admit that the CALIFORNIA STATE GRANGE took part in programs sponsored by the
13 National Grange prior to April 5, 2013.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 38:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. Responding Party further objects
19 that the phrase "took part in programs" is vague and ambiguous. The term "CALIFORNIA
20 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
21 California State Grange, a California corporation, is not and never has been a legal "division" of
22 National Grange. Overbroad and not limited in temporal scope.

23 Without waiving any objections, Responding Party responds only as to California State
24 Grange, a California corporation: Admit.

25 **REQUEST FOR ADMISSION NO. 39:**

26 Admit that the CALIFORNIA STATE GRANGE was represented by the National Grange in
27 lobbying activities prior to April 5, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 39:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. Responding Party further objects
6 that the phrase "was represented by" is vague and ambiguous. The term "CALIFORNIA STATE
7 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the California
8 State Grange, a California corporation, is not and never has been a legal "division" of National
9 Grange. Overbroad and not limited in temporal scope.

10 Without waiving any objections, Responding Party responds only as to California State
11 Grange, a California corporation: Admit.

12 **REQUEST FOR ADMISSION NO. 40:**

13 Admit that when you became a member of the CALIFORNIA STATE GRANGE, YOU
14 agreed pursuant to Article III of the Constitution of the CALIFORNIA STATE GRANGE to at all
15 times "faithfully comply with the Constitution, By-Laws, and Codes of Conduct of the Grange at all
16 levels."

17 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 40:**

18 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
19 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
20 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
21 objects that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that
22 both the Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be
23 the "California State Grange," and Responding Party does not know Propounding Party's
24 contentions as to its own origins. Furthermore, the California State Grange, a California
25 corporation, is not and never has been a legal "division" of National Grange. Responding Party
26 objects that the phrase "pursuant to" and the term "installed" are vague and ambiguous. "YOU" is
27 overbroad, compound, conjunctive, and/or disjunctive as defined.

1 Without waiving any objections, Responding Party responds on behalf of herself only:
2 Upon information and belief, admit as to California State Grange, a California corporation.

3 **REQUEST FOR ADMISSION NO. 41:**

4 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2012.

5 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 41:**

6 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
7 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
8 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
9 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
10 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
11 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
12 disjunctive as defined.

13 **REQUEST FOR ADMISSION NO. 42:**

14 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on September 16,
15 2012.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 42:**

17 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
18 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
19 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
20 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
21 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
22 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
23 disjunctive as defined.

24 **REQUEST FOR ADMISSION NO. 43:**

25 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2013.

26 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 43:**

27 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
28 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not

1 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
2 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
3 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
4 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
5 disjunctive as defined.

6 **REQUEST FOR ADMISSION NO. 44:**

7 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on April 4, 2013.

8 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 44:**

9 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
10 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
11 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
12 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
13 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
14 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
15 disjunctive as defined.

16 **REQUEST FOR ADMISSION NO. 45:**

17 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on October 1,
18 2013.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 45:**

20 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
21 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
22 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
23 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
24 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
25 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
26 disjunctive as defined.

1 **REQUEST FOR ADMISSION NO. 46:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on December 31,
3 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 46:**

5 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
6 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
7 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
8 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
9 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
10 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
11 disjunctive as defined.

12 **REQUEST FOR ADMISSION NO. 47:**

13 Admit that an entity may not operate as a Grange within the Order of Patrons of Husbandry
14 without a Charter issued by the National Grange.

15 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 47:**

16 Responding Party objects that the request is, as a whole, vague and ambiguous.
17 Responding Party objects that the terms "an entity", "may not", "operate", "as a Grange", and
18 "within the Order" are vague and ambiguous in the context of the request.

19 Without waiving any objections, Responding Party responds: Responding Party is without
20 sufficient personal information to admit or deny the request.

21 **REQUEST FOR ADMISSION NO. 48:**

22 Admit that an entity may not operate as a State Grange within the Order of Patrons of
23 Husbandry without a Charter issued by the National Grange.

24 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 48:**

25 Responding Party objects that the request is, as a whole, vague and ambiguous.
26 Responding Party objects that the terms "an entity", "may not", "operate", "as a State Grange",
27 and "within the Order" are vague and ambiguous in the context of the request.
28

1 Without waiving any objections, Responding Party responds: Responding Party is without
2 sufficient personal information to admit or deny the request.

3 **REQUEST FOR ADMISSION NO. 49:**

4 Admit that the entity YOU purport to be the "California State Grange" is operating without a
5 Charter issued by the National Grange.

6 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 49:**

7 Responding Party objects that the term "the entity YOU purport to be the 'California State
8 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the term
9 "operating" is vague and ambiguous. Assumes facts and lacks foundation to the extent a charter is
10 necessary to operate as the California State Grange. "YOU" is overbroad, compound, conjunctive,
11 and/or disjunctive as defined.

12 Without waiving any objection, Responding Party responds as follows on behalf of herself
13 only: Admit as to California State Grange, a California corporation.

14 **REQUEST FOR ADMISSION NO. 50:**

15 Admit that since April 5, 2013, the activities of the entity YOU purport to be the "California
16 State Grange" have not been in furtherance of the general purposes of the Order of Patrons of
17 Husbandry.

18 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 50:**

19 Responding Party objects that the term "the entity YOU purport to be the 'California State
20 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
21 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of
22 the general purposes of the Order of Patrons of Husbandry." Not full and complete in and of
23 itself. Overbroad. "YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

24 **REQUEST FOR ADMISSION NO. 51:**

25 Admit that since April 5, 2013, the activities of the entity YOU purport to be the "California
26 State Grange" have not been in furtherance of the general purposes of the National Grange.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 51:**

2 Responding Party objects that the term "the entity YOU purport to be the 'California State
3 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
4 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of the
5 general purposes of the National Grange." Not full and complete in and of itself. Overbroad.
6 YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

7 DATED: January 23, 2015

BOUTIN JONES INC.

Gabrielle D. Boutin

*For
Daniel S. Stouder*

8
9
10 By: _____

Robert D. Swanson

Daniel S. Stouder

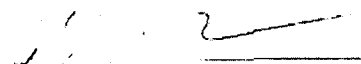
11 Attorneys for Defendant and Cross-complainant,
12 The California State Grange and Defendants
13 Jon Luvaas, Gerald Chernoff, Damian Parr,
14 Takashi Yogi, Kathy Bergeron, and Bill Thomas
15
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1 VERIFICATION

2 I, Kathy Bergeron, am a party to the above titled action. I have read the foregoing
3 KATHY BERGERON'S RESPONSE TO PLAINTIFFS IN-INTERVENTION'S
4 REQUESTS FOR ADMISSION, SET ONE and know its contents. The matters stated in the
5 document described above are true to my own knowledge and belief, except as to those matters
6 stated on information and belief, and as to those matters I believe them to be true.

7 I declare under penalty of perjury under the laws of the State of California that the
8 foregoing is true and correct.

9 EXECUTED on 17 day of January 2015 at Sacramento, California.

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12 
13 Kathy Bergeron
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PROOF OF SERVICE
[CCP §1013, 1013a]

CASE: The National Grange v. The California State Grange, et al
COURT/CASE NO.: Sacramento Superior Court Case No.: 34-2012-00130439

The undersigned declares:

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action; I am employed by Boutin Jones Inc., 555 Capitol Mall, Suite 1500, Sacramento, California 95814-4603.

On this date I served the foregoing document described as: **KATHY BERGERON'S RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S REQUESTS FOR ADMISSION, SET ONE** on all parties in said action by causing a true copy thereof to be

- ☐ Transmitted Via Facsimile to the fax number set forth below before 5:00 p.m. on this date
- ☒ Placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail, as indicated below
- ☒ Sent Via Overnight Delivery by depositing in/at the appropriate facility for said service, as indicated below

addressed to the person(s) on whom it is to be served, whose name(s) and address(es) are listed below:

Attorneys for Plaintiff:
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The California State Grange and Ed Komski
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SCHIFF HARDIN LLP
901 K Street NW, Suite 700
Washington, DC 20001
Telephone: (202) 778-6400
Fax: (202) 778-6460
BY OVERNIGHT DELIVERLY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on January 23, 2015, at Sacramento, California.


Micky Kelly

KATHY BERGERON'S RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S REQUESTS FOR ADMISSION,
SET ONE

Exhibit QQ

1 **BOUTIN JONES INC.**

Robert D. Swanson SBN 162816

2 Daniel S. Stouder SBN 226753

555 Capitol Mall, Suite 1500

3 Sacramento, CA 95814-4603

Telephone: (916) 321-4444

4 Facsimile: (916) 441-7597

5 Attorneys for Defendant and Cross-complainant,

The California State Grange and Defendants

6 Jon Luvaas, Gerald Chernoff, Damian Parr,

7 Takashi Yogi, Kathy Bergeron, and Bill Thomas

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF SACRAMENTO**

10 THE NATIONAL GRANGE OF THE ORDER)

OF PATRONS OF HUSBANDRY, a)

11 Washington D.C. nonprofit corporation,)

12 Plaintiff,

13 vs.

14 THE CALIFORNIA STATE GRANGE, a)

California nonprofit corporation, and ROBERT)

15 McFARLAND, JOHN LUVAAS, GERALD)

16 CHERNOFF and DAMIAN PARR,)

17 Defendant.)

18)
19 AND RELATED CROSS-ACTIONS.)
20)

Case No.: 34-2012-00130439

**BILL THOMAS' RESPONSE TO
PLAINTIFFS-IN-INTERVENTION'S
SPECIAL INTERROGATORIES,
SET ONE**

21 PROPOUNDING PARTY: Plaintiffs-in-Intervention

22 RESPONDING PARTY: Bill Thomas

23 SET NUMBER: One

24 **GENERAL OBJECTIONS**

25 Bill Thomas ("Responding Party") objects to the special interrogatories and to each
26 individual interrogatory on the following grounds:

1 1. Responding Party objects to each interrogatory to the extent that it seeks to impose
2 upon Responding Party an obligation to respond greater than that required by Code of Civil
3 Procedure § 2030.010 et seq.

4 2. Responding Party objects to each interrogatory to the extent that it seeks
5 information protected by the attorney-client privilege and/or the attorney work product doctrine,
6 including, but not limited to, the joint defense privilege.

7 3. Responding Party objects to each interrogatory to the extent that it seeks
8 information that is neither relevant nor reasonably calculated to lead to the discovery of admissible
9 evidence.

10 4. Responding Party objects to each interrogatory to the extent it is vague, ambiguous,
11 confusing, overbroad, contains subparts, and/or is compound, conjunctive and/or disjunctive.

12 5. Responding Party objects to each interrogatory to the extent it is unreasonably
13 cumulative and duplicative to the extent that it seeks information otherwise obtained from
14 Responding Party or others in this lawsuit.

15 6. Responding Party objects to each interrogatory to the extent that it seeks
16 information equally available to Propounding Party and Responding Party.

17 7. Responding Party objects to each interrogatory to the extent that responding would
18 be oppressive and/or unduly burdensome.

19 8. These responses are made solely for the purpose of this action. Each response is
20 subject to all appropriate objections that would require the exclusion of any statement contained in
21 any response if the interrogatory was made or if the response was given by a witness present and
22 testifying in court. All objections are reserved and may be interposed at the time of trial.

23 9. Responding Party has not yet completed an investigation of the facts relating to this
24 action, discovery in this action, nor preparation for trial in this action. Consequently, the following
25 responses to individual interrogatories are based on information presently available to Responding
26 Party and are given without prejudice to the right of Responding Party to produce at the time of
27 trial any and all subsequently discovered facts and evidence relating to the proof of presently
28

1 known material facts, and to produce all evidence, whenever discovered, relating to the proof of
2 subsequently discovered material facts.

3 10. The fact that Responding Party has responded to part or all of any specific
4 interrogatory is not intended and shall not be construed to be a waiver by Responding Party of all
5 or any part of any objection to any specific interrogatory.

6 **SPECIAL INTERROGATORIES, SET ONE**

7 **SPECIAL INTERROGATORY NO. 1:**

8 IDENTIFY all Bylaws or other rules applicable to the CALIFORNIA STATE GRANGE on
9 the following dates: (a) January 1, 2012; (b) September 16, 2012; (c) January 1, 2013; (d) April 4,
10 2013; (e) October 1, 2013; and (f) December 31, 2013.

11 For the purposes of these interrogatories, the term "IDENTIFY," when used in reference to
12 a DOCUMENTS, shall mean to describe the DOCUMENTS, its author(s), recipient(s), and date
13 prepared. Alternatively, if the responsive DOCUMENTS has been produced and Bates-stamped,
14 "IDENTIFY" shall mean to state the Bates-number(s) of the DOCUMENTS(S).

15 For the purposes of these Interrogatories, the term "DOCUMENTS" or "DOCUMENTS"
16 shall mean all writings as defined by California Evidence Code section 250, as well as any other
17 kind of printed, recorded, written, graphic, or photographic matter (including tape recordings, either
18 audio or video) as well as any information maintained by electronic data processing systems,
19 including all non-identical copies of such information, and any electronically stored information
20 such as e-mails and the like.

21 For the purposes of these Interrogatories, the term "CALIFORNIA STATE GRANGE"
22 shall refer to the division of the National Grange chartered by the National Grange in 1873,
23 including the California non-profit corporation called "California State Grange" incorporated in
24 1946 and the California non-profit corporation called "California Grange Foundation" incorporated
25 in 1992.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

27 Responding Party objects that the interrogatory contains subparts and is compound,
28 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad,

1 vague and ambiguous with respect to the definitions of the terms "author(s)" and "recipient(s)"
2 within the definition of the term "IDENTIFY," and the definition of the term "CALIFORNIA
3 STATE GRANGE." Both Responding Party and Propounding Party claim to fall within the
4 definition of CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE"
5 is compound, conjunctive, and/or disjunctive as defined. Furthermore, the California State
6 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
7 The term "Bylaws or other applicable rules" are vague and ambiguous as well as overbroad. The
8 term "applicable to" in this context is vague and ambiguous. Responding Party further objects to
9 the interrogatory to the extent it seeks information protected by the attorney-client privilege and/or
10 the attorney work product doctrine.

11 **SPECIAL INTERROGATORY NO. 2:**

12 State the date(s) that YOU (a) ceased to be a member of the Order of Patrons of Husbandry;
13 (b) ceased to be affiliated with the Order of Patrons of Husbandry; and (c) ceased to be a member of
14 any organization affiliated with the National Grange of the Order of Patrons of Husbandry.

15 For the purposes of these Interrogatories, the terms "YOU" and "YOUR" shall mean
16 Defendant Bill Thomas, his attorneys, his present and former agents, and anyone acting on his
17 behalf.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

19 Responding Party objects that the interrogatory contains subparts and is compound,
20 conjunctive, and/or disjunctive. Responding Party objects that the definition of "YOU" is
21 overbroad, compound, conjunctive, and/or disjunctive as defined. Responding Party objects to the
22 word "affiliated" as vague and ambiguous. Without waiving any objection, Responding Party
23 answers for himself only as follows: No later than April 5, 2013 as to National Grange only.

24 **SPECIAL INTERROGATORY NO. 3:**

25 IDENTIFY all NATIONAL SESSIONS of the National Grange to which the CALIFORNIA
26 STATE GRANGE sent a representative since 1873.

27 For the purposes of these Interrogatories, the term "NATIONAL SESSION" shall refer to
28 the annual meeting or "convention" of the National Grange.

1 For purposes of these Interrogatories, the term "IDENTIFY" with respect to a date shall
2 mean to state the year and to specify a range of dates, if applicable.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

4 Responding Party objects that the interrogatory contains subparts and is compound,
5 conjunctive, and/or disjunctive. Responding Party objects that the interrogatory is overbroad,
6 vague and ambiguous with respect to the definition of the term "CALIFORNIA STATE
7 GRANGE." Both Responding Party and Propounding Party claim to fall within the definition of
8 CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is
9 compound, conjunctive, and/or disjunctive as defined. Furthermore, the California State Grange, a
10 California corporation, is not and never has been a legal "division" of National Grange.
11 Responding Party further objects that the interrogatory is vastly overbroad and unduly burdensome
12 as to time period and seeks information that is not relevant or likely to lead to the discovery of
13 admissible evidence.

14 Without waiving any objections, Responding Party responds as follows: it is Responding
15 Party's understanding that California State Grange, a California corporation, sent representatives to
16 the National Grange convention for most years leading up to the suspension and then revocation of
17 California State Grange's charter by National Grange.

18 **SPECIAL INTERROGATORY NO. 4:**

19 IDENTIFY all real property acquired, owned, or held by the CALIFORNIA STATE
20 GRANGE since its formation in 1873.

21 For purposes of these Interrogatories, the term "IDENTIFY" with respect to real property
22 shall mean to state the physical address of the property, the date of its acquisition, the date of its
23 sale (if any), the name in which title was and/or is held, the amount of the mortgage on the property
24 (if any), and date the property was mortgaged (if it was).

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

26 Responding Party objects that the interrogatory seeks information that is confidential and
27 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
28 Party objects that the interrogatory contains subparts and is compound, conjunctive, and/or

1 disjunctive. Responding Party objects in that the interrogatory impermissibly seeks financial
2 condition discovery. Responding Party objects that the interrogatory is overbroad, vague and
3 ambiguous with respect to the definition of the term "CALIFORNIA STATE GRANGE." Both
4 Responding Party and Propounding Party claim to fall within the definition of CALIFORNIA
5 STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive,
6 and/or disjunctive as defined. Furthermore, the California State Grange, a California corporation,
7 is not and never has been a legal "division" of National Grange. Responding Party further objects
8 that the interrogatory is vastly overbroad and unduly burdensome as to time period as it seeks over
9 100 years of information and seeks information that is not relevant nor likely to lead to the
10 discovery of admissible evidence.

11 **SPECIAL INTERROGATORY NO. 5:**

12 IDENTIFY all financial accounts, including but not limited to bank accounts, brokerage
13 accounts, trust accounts, and mutual funds, held by the CALIFORNIA STATE GRANGE on
14 January 1, 2012.

15 For purposes of these Interrogatories, the term "IDENTIFY" with respect to financial
16 accounts shall mean to state the financial institution at which the account is held, the name of the
17 account holder, the account number, the names of all individuals entitled to deposit to or transfer or
18 withdraw funds from the account, the account balance as of January 1, 2012, the current status of
19 the account, and the account balance stated in the most recent statement of account.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

21 Responding Party objects that the interrogatory seeks information that is confidential and
22 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
23 Party objects in that the interrogatory impermissibly seeks financial condition discovery.
24 Responding Party objects that the interrogatory contains subparts and is compound, conjunctive,
25 and/or disjunctive. Responding Party objects that the interrogatory is overbroad, vague and
26 ambiguous with respect to the definition of the term "CALIFORNIA STATE GRANGE." Both
27 Responding Party and Propounding Party claim to fall within the definition of CALIFORNIA
28 STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is compound, conjunctive,

1 and/or disjunctive as defined. Furthermore, the California State Grange, a California corporation,
2 is not and never has been a legal "division" of National Grange. Responding Party further objects
3 that the interrogatory seeks information that is not relevant or likely to lead to the discovery of
4 admissible evidence.

5 Without waiving any objection, Responding Party is without information sufficient to
6 respond fully to this interrogatory.

7 **SPECIAL INTERROGATORY NO. 6:**

8 IDENTIFY all real and personal property of the CALIFORNIA STATE GRANGE that
9 YOU contend was not donated to be used for the general purposes of the Order of Patrons of
10 Husbandry.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

12 Responding Party objects that the interrogatory seeks information that is confidential and
13 protected by the right to privacy in Article I, section 1 of the California Constitution. Responding
14 Party objects in that the interrogatory impermissibly seeks financial condition discovery.
15 Responding Party objects that the interrogatory contains subparts and is compound, conjunctive,
16 and/or disjunctive. Responding Party objects that the interrogatory is overbroad, confusing, vague
17 and ambiguous with respect to the phrase "was not donated to be used for the general purposes of
18 the Order of Patrons of Husbandry." Responding Party objects that the interrogatory is overbroad,
19 vague and ambiguous with respect to the definition of the term "CALIFORNIA STATE
20 GRANGE." Both Responding Party and Propounding Party claim to fall within the definition of
21 CALIFORNIA STATE GRANGE. In addition, "CALIFORNIA STATE GRANGE" is
22 compound, conjunctive, and/or disjunctive as defined as it refers to three separate entities.
23 Furthermore, the California State Grange, a California corporation, is not and never has been a
24 legal "division" of National Grange. Responding Party objects that the interrogatory is unduly
25 burdensome. Responding Party objects to the interrogatory to the extent it seeks information
26 protected by the attorney/client privilege, the attorney work product doctrine, and/or requires
27 Responding Party to draw legal conclusions. Responding Party objects that the interrogatory seeks
28

1 information not within Responding Party's personal knowledge and seeks an analysis of the source
2 of literally every asset of the California State Grange acquired since 1873.
3

4 DATED: January 23, 2015

BOUTIN JONES INC.

Cordell D. Boutin
For
Daniel S. Stouder

By: 

Robert D. Swanson

Daniel S. Stouder

Attorneys for Defendant and Cross-complainant,
The California State Grange and Defendants
Jon Luvaas, Gerald Chernoff, Damian Parr,
Takashi Yogi, Kathy Bergeron, and Bill Thomas

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VERIFICATION

I, Bill Thomas, am a party to the above titled action. I have read the foregoing **BILL THOMAS' RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S SPECIAL INTERROGATORIES, SET ONE** and know its contents. The matters stated in the document described above are true of my own knowledge and belief except as to those matters stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on 22 day of January, 2015, at RANCHO CORDOVA California.



Bill Thomas

PROOF OF SERVICE
[CCP §1013, 1013a]

CASE: The National Grange v. The California State Grange, et al
COURT/CASE NO.: Sacramento Superior Court Case No.: 34-2012-00130439

The undersigned declares:

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action; I am employed by Boutin Jones Inc., 555 Capitol Mall, Suite 1500, Sacramento, California 95814-4603.

On this date I served the foregoing document described as: **BILL THOMAS' RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S SPECIAL INTERROGATORIES, SET ONE**, on all parties in said action by causing a true copy thereof to be

- ☐ Transmitted Via Facsimile to the fax number set forth below before 5:00 p.m. on this date
- ☒ Placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail, as indicated below
- ☒ Sent Via Overnight Delivery by depositing in/at the appropriate facility for said service, as indicated below

addressed to the person(s) on whom it is to be served, whose name(s) and address(es) are listed below:

Attorneys for Plaintiff: Martin N. Jensen, Esq. mjensen@porterscott.com Thomas L. Riordan, Esq. triordan@porterscott.com Porter Scott 350 University Ave., Suite 200 Sacramento, CA 95825 Telephone: 916-929-1481 Fax: 916-927-3706 BY US MAIL	Attorneys for Defendant Robert McFarland: Mark Ellis, Esq. mellis@ellislawgrp.com Ellis Law Group 740 University Ave., Suite 100 Sacramento, CA 95814 Telephone: 916-283-8820 Fax: 916-283-8821 BY US MAIL
Attorneys for Cross-defendants Martha Stefenoni and Shirley Baker Michael A. Farbstein, Esq. maf@farbstein.com Maggie W. Trinh, Esq. mwt@farbstein.com Farbstein & Blackman 411 Borel Avenue, Suite 425 San Mateo, CA 94402-3518 Telephone: (650) 544-6200 Fax: (650) 554-6240 BY US MAIL	Attorneys for Plaintiffs-in-Intervention The California State Grange and Ed Komski Jeffrey D. Skinner jskinner@schiffhardin.com SCHIFF HARDIN LLP 901 K Street NW, Suite 700 Washington, DC 20001 Telephone: (202) 778-6400 Fax: (202) 778-6460 BY OVERNIGHT DELIVERLY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on January 23, 2015, at Sacramento, California.

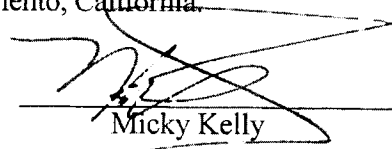

Micky Kelly

Exhibit RR

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Attorneys for Defendant and Cross-complainant,
The California State Grange and Defendants
Jon Luvaas, Gerald Chernoff, Damian Parr,
Takashi Yogi, Kathy Bergeron, and Bill Thomas

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

THE NATIONAL GRANGE OF THE ORDER)
OF PATRONS OF HUSBANDRY, a)
Washington D.C. nonprofit corporation,)

Plaintiff,

vs.

THE CALIFORNIA STATE GRANGE, a)
California nonprofit corporation, and ROBERT)
McFARLAND, JOHN LUYAAS, GERALD)
CHERNOFF and DAMIAN PARR,)

Defendant.

AND RELATED CROSS-ACTIONS.

Case No.: 34-2012-00130439

**BILL THOMAS' RESPONSE TO
PLAINTIFFS-IN-INTERVENTION'S
REQUESTS FOR ADMISSION, SET
ONE**

PROPOUNDING PARTY: Plaintiffs-in-Intervention

RESPONDING PARTY: Bill Thomas

SET NUMBER: One

GENERAL OBJECTIONS

Bill Thomas ("Responding Party") objects to the requests and to each individual request on
the following grounds:

1 1. The Responding Party objects to each request to the extent that it seeks to impose
2 upon the Responding Party an obligation to respond greater than that required by Code of Civil
3 Procedure § 2033.010 et seq.

4 2. Responding Party objects to each request to the extent that it seeks information
5 protected by the attorney-client privilege and/or the attorney work product doctrine, including, but
6 not limited to, the joint defense privilege.

7 3. The Responding Party objects to each request to the extent that it seeks information
8 that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

9 4. Responding Party objects to each request to the extent it is vague, ambiguous,
10 confusing, overbroad, contains subparts, and/or is compound, conjunctive and/or disjunctive.

11 5. Responding Party objects to each request to the extent that responding would be
12 oppressive and/or unduly burdensome.

13 6. These responses are made solely for the purpose of this action. Each response is
14 subject to all appropriate objections that would require the exclusion of any statement contained in
15 any response if the request was made or if the response was given by a witness present and
16 testifying in court. All objections are reserved and may be interposed at the time of trial.

17 7. The Responding Party has not yet completed investigation of the facts relating to
18 this action, discovery in this action, nor preparation for trial in this action. Consequently, the
19 following responses to individual requests are based on information presently available to the
20 Responding Party and are given without prejudice to the right of the Responding Party to produce
21 at the time of trial any and all subsequently discovered evidence relating to the proof of presently
22 known material facts, and to produce all evidence, whenever discovered, relating to the proof of
23 subsequently discovered material facts.

24 8. The fact that the Responding Party has responded to part or all of any specific
25 request is not intended and shall not be construed to be a waiver by the Responding Party of all or
26 any part of any objection to any specific request.

27

28

1 **REQUESTS FOR ADMISSION**

2 **REQUEST FOR ADMISSION NO. 1:**

3 Admit that YOU are not a member of the Order of Patrons of Husbandry.

4 For the purposes of these Requests for Admission, the terms "YOU" and "YOUR" shall
5 mean Defendant Bill Thomas, his attorneys, his present and former agents, and anyone acting on his
6 behalf.

7 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 1:**

8 Responding Party objects that the request is vague and ambiguous as to time period and as
9 to the phrase "member of the Order of Patrons of Husbandry." "YOU" is overbroad, compound,
10 conjunctive, and/or disjunctive as defined.

11 Without waiving any objections, Responding Party responds on behalf of himself only:
12 Admit.

13 **REQUEST FOR ADMISSION NO. 2:**

14 Admit that YOU are not a member of any organization affiliated with the Order of Patrons
15 of Husbandry.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 2:**

17 Responding Party objects that the request is vague and ambiguous as to time period and as
18 to the terms "member" and "affiliated with." "YOU" is overbroad, compound, conjunctive, and/or
19 disjunctive as defined.

20 Without waiving any objections, Responding Party responds on behalf of himself only:
21 Admit.

22 **REQUEST FOR ADMISSION NO. 3:**

23 Admit that YOU are not a member of any organization affiliated with the National Grange
24 of the Order of Patrons of Husbandry.

25 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 3:**

26 Responding Party objects that the request is vague and ambiguous as to time period and as
27 to the terms "member" and "affiliated with." "YOU" is overbroad, compound, conjunctive, and/or
28 disjunctive as defined.

1 Without waiving any objections, Responding Party responds on behalf of himself only:
2 Admit.

3 **REQUEST FOR ADMISSION NO. 4:**

4 Admit that YOU hold yourself out as a member of the Executive Committee of the
5 "California State Grange."

6 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 4:**

7 Responding Party objects that the request is vague and ambiguous as to the phrase "Hold
8 yourself out as." "YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

9 Without waiving any objections, Responding Party responds on behalf of himself only:
10 Admit.

11 **REQUEST FOR ADMISSION NO. 5:**

12 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to April 5,
13 2013.

14 For the purposes of these Requests for Admission, the term "CALIFORNIA STATE
15 GRANGE" shall refer to the division of the National Grange chartered by the National Grange in
16 1873, including the California non-profit corporation called "California State Grange" incorporated
17 in 1946 and the California non-profit corporation called "California Grange Foundation"
18 incorporated in 1992.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 5:**

20 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
21 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
22 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
23 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
24 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
25 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
26 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

27 Without waiving any objections, Responding Party responds only as to California State
28 Grange, a California corporation: Admit.

1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to
3 April 5, 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 6:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
10 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
11 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

12 Without waiving any objections, Responding Party responds only as to California State
13 Grange, a California corporation: Admit.

14 **REQUEST FOR ADMISSION NO. 7:**

15 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations
16 prior to April 5, 2013.

17 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 7:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
19 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
20 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
21 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
22 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
23 objects that the term "charitable monetary donations" is vague and ambiguous. Furthermore, the
24 California State Grange, a California corporation, is not and never has been a legal "division" of
25 National Grange.

26 Without waiving any objections, Responding Party responds: Responding Party is without
27 sufficient personal information to admit or deny the request.

1 **REQUEST FOR ADMISSION NO. 8:**

2 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary
3 donations prior to April 5, 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 8:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
10 objects that the term "charitable non-monetary donations" is vague and ambiguous. Furthermore,
11 the California State Grange, a California corporation, is not and never has been a legal "division"
12 of National Grange.

13 Without waiving any objections, Responding Party responds: Responding Party is without
14 sufficient personal information to admit or deny the request.

15 **REQUEST FOR ADMISSION NO. 9:**

16 Admit that the CALIFORNIA STATE GRANGE acquired real property prior to 1946.

17 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 9:**

18 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
19 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
20 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
21 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
22 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
23 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
24 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

25 Without waiving any objections, Responding Party responds: Responding Party is without
26 sufficient personal information to admit or deny the request.

27 **REQUEST FOR ADMISSION NO. 10:**

28 Admit that the CALIFORNIA STATE GRANGE acquired personal property prior to 1946.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 10:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
7 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
8 Grange, a California corporation, is not and never has been a legal "division" of National Grange.

9 Without waiving any objections, Responding Party responds: Responding Party is without
10 sufficient personal information to admit or deny the request.

11 **REQUEST FOR ADMISSION NO. 11:**

12 Admit that the CALIFORNIA STATE GRANGE received charitable monetary donations
13 prior to 1946.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 11:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
19 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
20 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
21 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
22 Responding Party objects that the term "charitable monetary donations" is vague and ambiguous

23 Without waiving any objections, Responding Party responds: Responding Party is without
24 sufficient personal information to admit or deny the request.

25 **REQUEST FOR ADMISSION NO. 12:**

26 Admit that the CALIFORNIA STATE GRANGE received charitable non-monetary
27 donations prior to 1946.

28

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 12:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
7 objects that the term "acquired" is vague and ambiguous. Furthermore, the California State
8 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
9 Responding Party objects that the term "charitable non-monetary donations" is vague and
10 ambiguous

11 Without waiving any objections, Responding Party responds: Responding Party is without
12 sufficient personal information to admit or deny the request.

13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
15 Grange prior to April 5, 2013.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 13:**

17 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
18 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
19 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
20 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
21 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
22 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
23 State Grange, a California corporation, is not and never has been a legal "division" of National
24 Grange.

25 Without waiving any objections, Responding Party responds only as to California State
26 Grange, a California corporation: Deny.

1 **REQUEST FOR ADMISSION NO. 14:**

2 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
3 Grange prior to September 17, 2012.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 14:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
10 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
11 State Grange, a California corporation, is not and never has been a legal "division" of National
12 Grange.

13 Without waiving any objections, Responding Party responds only as to of California State
14 Grange, a California corporation: Deny.

15 **REQUEST FOR ADMISSION NO. 15:**

16 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
17 Grange prior to January 1, 2012

18 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 15:**

19 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
20 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
21 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
22 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
23 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
24 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
25 State Grange, a California corporation, is not and never has been a legal "division" of National
26 Grange.

27 Without waiving any objections, Responding Party responds only as to California State
28 Grange, a California corporation: Deny.

1 **REQUEST FOR ADMISSION NO. 16:**

2 Admit that the CALIFORNIA STATE GRANGE was a chartered division of the National
3 Grange prior to 1946.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 16:**

5 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
6 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
7 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
8 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
9 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party
10 objects that the term "chartered division" is vague and ambiguous. Furthermore, the California
11 State Grange, a California corporation, is not and never has been a legal "division" of National
12 Grange.

13 Without waiving any objections, Responding Party responds only as to California State
14 Grange, a California corporation: Deny.

15 **REQUEST FOR ADMISSION NO. 17:**

16 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to April 5,
17 2013, were to be used for the general purposes of the Order of Patrons of Husbandry within the
18 State of California.

19 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 17:**

20 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
21 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
22 Intervention) claim to be the "California State Grange," and Responding Party does not know
23 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
24 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further
25 objects that the phrase "were to be used for the general purposes of the Order of Patrons of
26 Husbandry within the State of California" is vague and ambiguous. Furthermore, the California
27 State Grange, a California corporation, is not and never has been a legal "division" of National
28 Grange.

1 Without waiving any objections, Responding Party responds: Responding Party is without
2 sufficient personal information to admit or deny the request.

3 **REQUEST FOR ADMISSION NO. 18:**

4 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to
5 September 17, 2012, were to be used for the general purposes of the Order of Patrons of Husbandry
6 within the State of California.

7 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 18:**

8 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
9 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
10 Intervention) claim to be the "California State Grange," and Responding Party does not know
11 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
12 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further
13 objects that the phrase "were to be used for the general purposes of the Order of Patrons of
14 Husbandry within the State of California" is vague and ambiguous. Furthermore, the California
15 State Grange, a California corporation, is not and never has been a legal "division" of National
16 Grange.

17 Without waiving any objections, Responding Party responds: Responding Party is without
18 sufficient personal information to admit or deny the request.

19 **REQUEST FOR ADMISSION NO. 19:**

20 Admit that all donations received by the CALIFORNIA STATE GRANGE prior to
21 January 1, 2012, were to be used for the general purposes of the Order of Patrons of Husbandry
22 within the State of California.

23 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 19:**

24 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is vague
25 and ambiguous, in that both the Defendant in this action and the Propounding Party (Plaintiff-in-
26 Intervention) claim to be the "California State Grange," and Responding Party does not know
27 Propounding Party's contentions as to its own origins. The term "CALIFORNIA STATE
28 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Responding Party further

1 objects that the phrase “were to be used for the general purposes of the Order of Patrons of
2 Husbandry within the State of California” is vague and ambiguous. Furthermore, the California
3 State Grange, a California corporation, is not and never has been a legal “division” of National
4 Grange.

5 Without waiving any objections, Responding Party responds: Responding Party is without
6 sufficient personal information to admit or deny the request.

7 **REQUEST FOR ADMISSION NO. 20:**

8 Admit that the organization YOU purport to be the “California State Grange” has collected
9 dues from Pomona, Subordinate, and Junior Granges in California since April 5, 2013.

10 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 20:**

11 Responding Party objects that the phrase “has collected dues...since April 5, 2013” is
12 vague and ambiguous. Responding Party objects that the term “the organization YOU purport to
13 be the ‘California State Grange’” is vague, ambiguous, and unintelligible. Compound,
14 conjunctive, and/or disjunctive. “YOU” is overbroad, compound, conjunctive, and/or disjunctive
15 as defined.

16 Without waiving any objections, Responding Party responds: Admit as to California State
17 Grange, a California corporation.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that the organization YOU purport to be the “California State Grange” has not paid
20 any dues to the National Grange since April 5, 2013.

21 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 21:**

22 Responding Party objects that the term “the organization YOU purport to be the ‘California
23 State Grange’” is vague, ambiguous, and unintelligible. “YOU” is overbroad, compound,
24 conjunctive, and/or disjunctive as defined.

25 Without waiving any objections, Responding Party responds on behalf of himself only:
26 Admit as to California State Grange, a California corporation.

27 **REQUEST FOR ADMISSION NO. 22:**

28 Admit that the CALIFORNIA STATE GRANGE was formed in 1873.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 22:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
7 California State Grange, a California corporation, is not and never has been a legal "division" of
8 National Grange.

9 Without waiving any objections, Responding Party responds: Responding Party is without
10 sufficient personal information to admit or deny the request.

11 **REQUEST FOR ADMISSION NO. 23:**

12 Admit that the National Grange issued a Charter to the CALIFORNIA STATE GRANGE in
13 1873.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 23:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
19 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
20 California State Grange, a California corporation, is not and never has been a legal "division" of
21 National Grange.

22 Without waiving any objections, Responding Party responds: Responding Party is without
23 sufficient personal information to admit or deny the request.

24 **REQUEST FOR ADMISSION NO. 24:**

25 Admit that the National Grange suspended the Charter of the CALIFORNIA STATE
26 GRANGE on September 17, 2012.

27 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 24:**

28 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is

1 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
2 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
3 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
4 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
5 California State Grange, a California corporation, is not and never has been a legal "division" of
6 National Grange.

7 Without waiving any objections, Responding Party responds only as to California State
8 Grange, a California corporation: Admit.

9 **REQUEST FOR ADMISSION NO. 25:**

10 Admit that the National Grange revoked the Charter of the CALIFORNIA STATE
11 GRANGE on April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 25:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
14 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
15 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
16 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
17 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
18 California State Grange, a California corporation, is not and never has been a legal "division" of
19 National Grange.

20 Without waiving any objections, Responding Party responds only as to California State
21 Grange, a California corporation: Admit.

22 **REQUEST FOR ADMISSION NO. 26:**

23 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
24 SESSION of the National Grange in 1986.

25 For the purposes of these Requests for Admission, the term "NATIONAL SESSION" shall
26 refer to the annual meeting or convention of the National Grange.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 26:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
6 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
7 California State Grange, a California corporation, is not and never has been a legal "division" of
8 National Grange.

9 Without waiving any objections, Responding Party responds: Responding Party is without
10 sufficient personal information to admit or deny the request.

11 **REQUEST FOR ADMISSION NO. 27:**

12 Admit that the CALIFORNIA STATE GRANGE sent a representative to the NATIONAL
13 SESSION of the National Grange in 1996.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 27:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
19 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
20 California State Grange, a California corporation, is not and never has been a legal "division" of
21 National Grange.

22 Without waiving any objections, Responding Party responds: Responding Party is without
23 sufficient personal information to admit or deny the request.

24 **REQUEST FOR ADMISSION NO. 28:**

25 Admit that the CALIFORNIA STATE GRANGE sent a representative to every NATIONAL
26 SESSION of the National Grange between 1874 and 2011.

27 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 28:**

28 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is

1 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
2 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
3 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
4 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
5 California State Grange, a California corporation, is not and never has been a legal "division" of
6 National Grange.

7 Without waiving any objections, Responding Party responds: Responding Party is without
8 sufficient personal information to admit or deny the request.

9 **REQUEST FOR ADMISSION NO. 29:**

10 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
11 STATE GRANGE on January 1, 2012.

12 For the purposes of these Requests for Admission, the term "DIGEST OF LAWS" shall
13 refer to Digest of Laws of the Order of Patrons of Husbandry adopted and proclaimed by the
14 National Grange.

15 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 29:**

16 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
17 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
18 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
19 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
20 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
21 California State Grange, a California corporation, is not and never has been a legal "division" of
22 National Grange.

23 Without waiving any objections, Responding Party responds: Responding Party is without
24 sufficient personal information to admit or deny the request.

25 **REQUEST FOR ADMISSION NO. 30:**

26 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
27 STATE GRANGE on September 16, 2012.

28

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 30:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
6 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
7 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
8 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
9 DIGEST OF LAWS" is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
10 context.

11 **REQUEST FOR ADMISSION NO. 31:**

12 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
13 STATE GRANGE on January 1, 2013.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 31:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
19 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
20 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
21 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
22 DIGEST OF LAWS" is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
23 context.

24 **REQUEST FOR ADMISSION NO. 32:**

25 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
26 STATE GRANGE on April 4, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 32:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
6 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
7 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
8 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
9 DIGEST OF LAWS" is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
10 context.

11 **REQUEST FOR ADMISSION NO. 33:**

12 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
13 STATE GRANGE on October 1, 2013.

14 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 33:**

15 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
16 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
17 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
18 not know Propounding Party's contentions as to its own origins. Furthermore, the California State
19 Grange, a California corporation, is not and never has been a legal "division" of National Grange.
20 Responding Party further objects that the term "applied to the CALIFORNIA STATE GRANGE"
21 is overbroad and vague and ambiguous. Responding Party objects that "the rules set forth in the
22 DIGEST OF LAWS" is vague, overbroad, and compound, conjunctive, and/or disjunctive in this
23 context.

24 **REQUEST FOR ADMISSION NO. 34:**

25 Admit that the rules set forth in the DIGEST OF LAWS applied to the CALIFORNIA
26 STATE GRANGE on December 31, 2013.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 34:**

2 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
3 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
4 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
5 not know Propounding Party's contentions as to its own origins. Responding Party further objects
6 that the term "applied to the CALIFORNIA STATE GRANGE" is overbroad and vague and
7 ambiguous. The term "CALIFORNIA STATE GRANGE" is compound, conjunctive, and/or
8 disjunctive as defined. Object to the extent this calls for a legal conclusion.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the CALIFORNIA STATE GRANGE sent annual and quarterly reports to the
11 National Grange prior to April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 35:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
14 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
15 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
16 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
17 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
18 California State Grange, a California corporation, is not and never has been a legal "division" of
19 National Grange. Overbroad and not limited in temporal scope.

20 Without waiving any objections, Responding Party responds only as to California State
21 Grange, a California corporation: Admit.

22 **REQUEST FOR ADMISSION NO. 36:**

23 Admit that the CALIFORNIA STATE GRANGE participated in the Grange Insurance
24 Association prior to April 5, 2013.

25 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 36:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
27 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
28 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does

1 not know Propounding Party's contentions as to its own origins. Responding Party objects to the
2 term "participated in" as vague and ambiguous. The term "CALIFORNIA STATE GRANGE" is
3 compound, conjunctive, and/or disjunctive as defined. Furthermore, the California State Grange, a
4 California corporation, is not and never has been a legal "division" of National Grange. Overbroad
5 and not limited in temporal scope.

6 Without waiving any objections, Responding Party responds only as to California State
7 Grange, a California corporation: Admit.

8
9 **REQUEST FOR ADMISSION NO. 37:**

10 Admit that the CALIFORNIA STATE GRANGE paid dues to the National Grange prior to
11 April 5, 2013.

12 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 37:**

13 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
14 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
15 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
16 not know Propounding Party's contentions as to its own origins. The term "CALIFORNIA
17 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
18 California State Grange, a California corporation, is not and never has been a legal "division" of
19 National Grange. Overbroad and not limited in temporal scope.

20 Without waiving any objections, Responding Party responds only as to California State
21 Grange, a California corporation: Admit.

22 **REQUEST FOR ADMISSION NO. 38:**

23 Admit that the CALIFORNIA STATE GRANGE took part in programs sponsored by the
24 National Grange prior to April 5, 2013.

25 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 38:**

26 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
27 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
28 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does

1 not know Propounding Party's contentions as to its own origins. Responding Party further objects
2 that the phrase "took part in programs" is vague and ambiguous. The term "CALIFORNIA
3 STATE GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the
4 California State Grange, a California corporation, is not and never has been a legal "division" of
5 National Grange. Overbroad and not limited in temporal scope.

6 Without waiving any objections, Responding Party responds only as to California State
7 Grange, a California corporation: Admit.

8 **REQUEST FOR ADMISSION NO. 39:**

9 Admit that the CALIFORNIA STATE GRANGE was represented by the National Grange in
10 lobbying activities prior to April 5, 2013.

11 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 39:**

12 Responding Party objects that the definition of "CALIFORNIA STATE GRANGE" is
13 vague and ambiguous, in that both the Defendant in this action and the Propounding Party
14 (Plaintiff-in-Intervention) claim to be the "California State Grange," and Responding Party does
15 not know Propounding Party's contentions as to its own origins. Responding Party further objects
16 that the phrase "was represented by" is vague and ambiguous. The term "CALIFORNIA STATE
17 GRANGE" is compound, conjunctive, and/or disjunctive as defined. Furthermore, the California
18 State Grange, a California corporation, is not and never has been a legal "division" of National
19 Grange. Overbroad and not limited in temporal scope.

20 Without waiving any objections, Responding Party responds only as to California State
21 Grange, a California corporation: Admit.

22 **REQUEST FOR ADMISSION NO. 40:**

23 Admit that when you became a member of the CALIFORNIA STATE GRANGE, YOU
24 agreed pursuant to Article III of the Constitution of the CALIFORNIA STATE GRANGE to at all
25 times "faithfully comply with the Constitution, By-Laws, and Codes of Conduct of the Grange at all
26 levels."
27
28

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 40:**

2 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
3 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
4 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
5 objects that the definition of "CALIFORNIA STATE GRANGE" is vague and ambiguous, in that
6 both the Defendant in this action and the Propounding Party (Plaintiff-in-Intervention) claim to be
7 the "California State Grange," and Responding Party does not know Propounding Party's
8 contentions as to its own origins. Furthermore, the California State Grange, a California
9 corporation, is not and never has been a legal "division" of National Grange. Responding Party
10 objects that the phrase "pursuant to" and the term "installed" are vague and ambiguous. "YOU" is
11 overbroad, compound, conjunctive, and/or disjunctive as defined.

12 Without waiving any objections, Responding Party responds on behalf of himself only:
13 Upon information and belief, admit as to California State Grange, a California corporation.

14 **REQUEST FOR ADMISSION NO. 41:**

15 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2012.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 41:**

17 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
18 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
19 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
20 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
21 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
22 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
23 disjunctive as defined.

24 **REQUEST FOR ADMISSION NO. 42:**

25 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on September 16,
26 2012.

1 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 42:**

2 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
3 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
4 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
5 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
6 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
7 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
8 disjunctive as defined.

9 **REQUEST FOR ADMISSION NO. 43:**

10 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on January 1, 2013.

11 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 43:**

12 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
13 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
14 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
15 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
16 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
17 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
18 disjunctive as defined.

19 **REQUEST FOR ADMISSION NO. 44:**

20 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on April 4, 2013.

21 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 44:**

22 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
23 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
24 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
25 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
26 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
27 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
28 disjunctive as defined.

1 **REQUEST FOR ADMISSION NO. 45:**

2 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on October 1,
3 2013.

4 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 45:**

5 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
6 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
7 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
8 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
9 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
10 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
11 disjunctive as defined.

12 **REQUEST FOR ADMISSION NO. 46:**

13 Admit that the rules set forth in the DIGEST OF LAWS applied to YOU on December 31,
14 2013.

15 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 46:**

16 Responding Party objects that the request is compound, conjunctive, and/or disjunctive in
17 violation of Code Civ. Proc. section 2033.060(f). Responding Party objects that the request is not
18 full and complete in itself, in violation of Code Civ. Proc. section 2033.060(f). Responding Party
19 objects that "the rules set forth in the DIGEST OF LAWS" is vague, overbroad, and compound,
20 conjunctive, and/or disjunctive in this context. Responding Party objects that the phrase "applied
21 to YOU" is vague and ambiguous. "YOU" is overbroad, compound, conjunctive, and/or
22 disjunctive as defined.

23 **REQUEST FOR ADMISSION NO. 47:**

24 Admit that an entity may not operate as a Grange within the Order of Patrons of Husbandry
25 without a Charter issued by the National Grange.

26 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 47:**

27 Responding Party objects that the request is, as a whole, vague and ambiguous.
28 Responding Party objects that the terms "an entity", "may not", "operate", "as a Grange", and

1 “within the Order” are vague and ambiguous in the context of the request.

2 Without waiving any objections, Responding Party responds: Responding Party is without
3 sufficient personal information to admit or deny the request.

4 **REQUEST FOR ADMISSION NO. 48:**

5 Admit that an entity may not operate as a State Grange within the Order of Patrons of
6 Husbandry without a Charter issued by the National Grange.

7 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 48:**

8 Responding Party objects that the request is, as a whole, vague and ambiguous.
9 Responding Party objects that the terms “an entity”, “may not”, “operate”, “as a State Grange”,
10 and “within the Order” are vague and ambiguous in the context of the request.

11 Without waiving any objections, Responding Party responds: Responding Party is without
12 sufficient personal information to admit or deny the request.

13 **REQUEST FOR ADMISSION NO. 49:**

14 Admit that the entity YOU purport to be the “California State Grange” is operating without a
15 Charter issued by the National Grange.

16 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 49:**

17 Responding Party objects that the term “the entity YOU purport to be the ‘California State
18 Grange’” is vague, ambiguous, and unintelligible. Responding Party objects that the term
19 “operating” is vague and ambiguous. Assumes facts and lacks foundation to the extent a charter is
20 necessary to operate as the California State Grange. “YOU” is overbroad, compound, conjunctive,
21 and/or disjunctive as defined.

22 Without waiving any objection, Responding Party responds as follows on behalf of himself
23 only: Admit as to California State Grange, a California corporation.

24 **REQUEST FOR ADMISSION NO. 50:**

25 Admit that since April 5, 2013, the activities of the entity YOU purport to be the “California
26 State Grange” have not been in furtherance of the general purposes of the Order of Patrons of
27 Husbandry.

28 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 50:**

1 Responding Party objects that the term "the entity YOU purport to be the 'California State
2 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
3 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of
4 the general purposes of the Order of Patrons of Husbandry." Not full and complete in and of
5 itself. Overbroad. "YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

6 **REQUEST FOR ADMISSION NO. 51:**

7 Admit that since April 5, 2013, the activities of the entity YOU purport to be the "California
8 State Grange" have not been in furtherance of the general purposes of the National Grange.

9 **RESPONSE TO REQUEST FOR ADMISSIONS NO. 51:**

10 Responding Party objects that the term "the entity YOU purport to be the 'California State
11 Grange'" is vague, ambiguous, and unintelligible. Responding Party objects that the request is
12 overbroad and vague and ambiguous with respect to the terms "activities" and "in furtherance of
13 the general purposes of the National Grange." Not full and complete in and of itself. Overbroad.
14 YOU" is overbroad, compound, conjunctive, and/or disjunctive as defined.

15
16 DATED: January 23, 2015

BOUTIN JONES INC.

Gabriele D. Boutin

For

Daniel S. Stouder

17
18
19 By: _____

Robert D. Swanson

Daniel S. Stouder

Attorneys for Defendant and Cross-complainant,
The California State Grange and Defendants
Jon Luvaas, Gerald Chernoff, Damian Parr,
Takashi Yogi, Kathy Bergeron, and Bill Thomas


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VERIFICATION

I, Bill Thomas, am a party to the above titled action. I have read the foregoing **BILL THOMAS' RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S REQUESTS FOR ADMISSION, SET ONE** and know its contents. The matters stated in the document described above are true of my own knowledge and belief except as to those matters stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on 22 day of January, 2015, at Rancho Cordova, California.



Bill Thomas

PROOF OF SERVICE
[CCP §1013, 1013a]

CASE: The National Grange v. The California State Grange, et al
COURT/CASE NO.: Sacramento Superior Court Case No.: 34-2012-00130439

The undersigned declares:

I am employed in the County of Sacramento, State of California. I am over the age of 18 years and not a party to the within action; I am employed by Boutin Jones Inc., 555 Capitol Mall, Suite 1500, Sacramento, California 95814-4603.

On this date I served the foregoing document described as: **BILL THOMAS' RESPONSE TO PLAINTIFFS-IN-INTERVENTION'S REQUESTS FOR ADMISSION, SET ONE**, on all parties in said action by causing a true copy thereof to be

- ☐ Transmitted Via Facsimile to the fax number set forth below before 5:00 p.m. on this date
- ☒ Placed in a sealed envelope with postage thereon fully prepaid in the designated area for outgoing mail, as indicated below
- ☒ Sent Via Overnight Delivery by depositing in/at the appropriate facility for said service, as indicated below

addressed to the person(s) on whom it is to be served, whose name(s) and address(es) are listed below:

Attorneys for Plaintiff: Martin N. Jensen, Esq. mjensen@porterscott.com Thomas L. Riordan, Esq. triordan@porterscott.com Porter Scott 350 University Ave., Suite 200 Sacramento, CA 95825 Telephone: 916-929-1481 Fax: 916-927-3706 BY US MAIL	Attorneys for Defendant Robert McFarland: Mark Ellis, Esq. mellis@ellislawgrp.com Ellis Law Group 740 University Ave., Suite 100 Sacramento, CA 95814 Telephone: 916-283-8820 Fax: 916-283-8821 BY US MAIL
Attorneys for Cross-defendants Martha Stefenoni and Shirley Baker Michael A. Farbstein, Esq. maf@farbstein.com Maggie W. Trinh, Esq. mwt@farbstein.com Farbstein & Blackman 411 Borel Avenue, Suite 425 San Mateo, CA 94402-3518 Telephone: (650) 544-6200 Fax: (650) 554-6240 BY US MAIL	Attorneys for Plaintiffs-in-Intervention The California State Grange and Ed Komski Jeffrey D. Skinner jkskinner@schiffhardin.com SCHIFF HARDIN LLP 901 K Street NW, Suite 700 Washington, DC 20001 Telephone: (202) 778-6400 Fax: (202) 778-6460 BY OVERNIGHT DELIVERLY

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

EXECUTED on January 23, 2015, at Sacramento, California.


Micky Kelly