

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs / Counterclaim Defendants,

v.

DERSHOWITZ,

Defendant / Counterclaim Plaintiff.

**DEFENDANT / COUNTERCLAIM PLAINTIFF ALAN M. DERSHOWITZ'S
OBJECTIONS TO PLAINTIFFS'
INTERROGATORIES TO DEFENDANT (PUNITIVE DAMAGES)**

Defendant / Counterclaim Plaintiff Alan M. Dershowitz ("Defendant") submits the following objections and responses to the "Net Worth Interrogatories" ("Interrogatories") propounded by Plaintiffs / Counterclaim Defendants Bradley J. Edwards and Paul G. Cassell ("Plaintiffs").

PRELIMINARY STATEMENT

These responses and objections reflect the current state of Defendant's knowledge regarding the matters discussed herein. Defendant has not completed his discovery or trial preparation in this matter. Accordingly, Defendant reserves the right to revise, correct, clarify, supplement, or amend his objections and responses to reflect information hereafter discovered or acquired. These responses and objections are provided without prejudice to the rights of Defendant to use or rely upon subsequently discovered information or documents at any time, including at trial. The fact that an Interrogatory has been complied with in part shall not be construed as a waiver of all or any part of any objection that Defendant might or could make to

any Interrogatory propounded by Plaintiffs. Defendant further reserves the right to object to the admission in evidence of any and all information made available in response to the Interrogatories on any ground, including, but not limited to, the ground that it is irrelevant and immaterial to the issues in this action.

RESPONSE TO INTERROGATORIES

1. What is your full name?

RESPONSE:

Alan Morton Dershowitz.

2. How are you currently employed?

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to

this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory. Subject to and without waiving the foregoing objections, Defendant states that he is a professor emeritus, a legal consultant who occasionally argues appeals, and a writer of articles and books. In addition, this case has taken at least half of Defendant's time over the past year.

3. State separately for each year and for each source of income, the amount of your current income from all sources for each of the past 3 years and describe all additional benefits received by you or payable to you for each of the past 3 years including bonuses, allowances, pension and profit sharing participations, stock options, deferred compensation, insurance benefits, royalties, advances, fees, and other income of any nature including the dollar amount or dollar value of each.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining "net worth" as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties' claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an

intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

4. If you own or have any beneficial interest in any stocks, bonds, mutual funds, or other securities of any class in any government, governmental organization, company, firm or corporation, whether foreign or domestic, please state:

- (a) The name and address of the entity in which you own or have any beneficial property or security interest of any sort;
- (b) The date and cost of acquisition;
- (c) The current fair market value of each interest;
- (d) The manner in which such value was calculated.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant

further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

5. As to each income tax return filed by you or on your behalf with any taxing authority for the years 2011 through 2014, identify as specifically as identified in your tax return the source of all reported income and the separate amounts derived from each source.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant

further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

6. For each parcel of real property in which you hold any interest, state:
 - (a) The address,
 - (b) The legal description of the property;
 - (c) The assessed value of the property for tax purposes;
 - (d) The date and price of acquisition;
 - (e) Whether, when, by whom, why and at what amount the property has been appraised since the time of purchase;
 - (f) Whether, when, and at what price the property has been offered for sale since the time of purchase;
 - (g) The name and address of each real estate agent with whom the property has been listed for sale since the time of purchase.
 - (h) The cost of any improvements made to the property since purchase;
 - (i) The nature of your interest in the property;
 - (j) The current fair market value of the property and a description of the manner in which that value was calculated.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

7. List each item and state the estimated value of all personal tangible, and intangible property in which you have an interest which personal property was acquired at a cost

in excess of \$10,000 or which personal property was acquired at a cost in excess of \$10,000 or which personal property has an estimated present value in excess of \$10,000, and as to each state:

- (a) The date of acquisition;
- (b) The cost of acquisition;
- (c) The current estimated fair market value;
- (d) The manner in which the fair market value was estimated.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate

additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

8. If any of the real or personal property owned by you, either individually, jointly or otherwise, is encumbered by either a real estate mortgage, chattel mortgage, chattel mortgage, or any other type of lien, then for each item of property, state a description of the nature and amount of the encumbrance the date the encumbrance arose, whether the encumbrance is evidenced by any written document and, if so, a description of that document.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the

production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

9. If you have an ownership interest in any businesses, for each business state:
 - (a) The name and address of the business;
 - (b) The present book value of the present market value of your interest in the business, and its percentage of the total value of the business;
 - (c) A description of the manner in which the stated fair market value was calculated.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not

reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

10. Identify all banks, credit union and savings and loan accounts, in which you have an interest or right of withdrawal and for each account state:

- (a) Where the account is located;
- (b) The highest and lowest balance in the account during the 365 day period immediately preceding your receipt of these interrogatories.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this

Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

11. Identify all other assets of a value in excess of \$10,000 which assets were not previously identified and as to each state.

- (a) The date of acquisition;
- (b) The cost of acquisition;
- (c) The current estimated fair market value;
- (d) The means utilized to estimate the current fair market value.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant

does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

12. Identify all other liabilities of an amount in excess of \$10,000 not previously identified and as to each state:

- (a) The date the liability rose;
- (b) The amount of the liability at inception;
- (c) The terms of repayment or satisfaction;
- (d) The current outstanding balance.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in

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13. As to any calculation or estimate of your net worth at any time in the five years immediately preceding to your receipt of these interrogatories, state:

- (a) The date of the calculation or estimate;
- (b) The name and address of the person or entity responsible for performing the work;
- (c) The reason for performing the calculation or estimate;
- (d) The amount of net worth calculated or estimated.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages.

Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

14. What is your present net worth?

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed

the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

15. As to all transfers of anything of value in excess of \$10,000 made by you or on your behalf within the past 3 years, state:

- (a) A description of the transferred property;
- (b) The reason for the transfer;
- (c) The value of the item(s) transferred at the time of transfer;
- (d) The date and cost of your acquisition of the item(s);
- (e) Whether you received anything of value in exchange for the transferred item(s) and, if so, a description of what you received and the dollar value of what you received;
- (f) The name and address of the recipient of each transferred item and the family relationship, if any, the recipient has to you.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary

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16. List all royalty agreements that you have for any publications or books you have authored, in whole or in part, including (but not limited to) Letters to a Young Lawyer; Why Terrorism Works: Understanding the Threat, Responding to the Challenge; Shouting Fire: Civil Liberties in a Turbulent Age; America Declares Independence; America on Trial; Inside the Legal Battles That Transformed Our Nation; Rights From Wrongs: A Secular Theory of the Origins of Rights; Preemption: A Knife That cuts Both Ways; Blasphemy: How the Religious Right is Hijacking the Declaration of Independence; Is There A Right to Remain Silent?: Coercive Interrogation and the Fifth Amendment After 9/11; The Case Against Israel's Enemies: Exposing Jimmy Carter and Others Who Stand in the Way of Peace; The Case For Moral Clarity: Israel, Hamas and Gaza; The Trials of Zion; Taking the Stand: My Life in the Law; Terror Tunnels: The Case for Israel's Just War Against Hamas; and Chutzpah; and any income received (directly or indirectly) from these books in the last three years and projected income to be received from these books in the next three years.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

17. List all assets with a value of \$10,000 or more (including but not limited to any stocks, bonds, real property, business interests, royalty agreements, bank accounts of any type, personal tangible, and intangible property in any form) that you have transferred to any person or entity on or after January 5, 2015.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

18. List all legal cases in which you have a representation agreement providing for compensation to you of any type, including but not limited to any cases in which you have a

contingency fee agreement, and the value of the compensation that is provided in the agreement (or the projected possible value of the contingency to be earned).

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

19. List any lawsuits that you have filed in any court in which you seek damages or any other financial recovery, and identify the case caption, the damages or other recovery sought and the court in which the suit has been filed.

RESPONSE:

Defendant objects to this Interrogatory to the extent that it is purportedly served for the purposes of determining “net worth” as premature because Plaintiffs have not demonstrated a substantial likelihood of success on the merits of a claim for punitive damages. Defendant will move for summary judgment on the requesting parties’ claim for punitive damages. Defendant further objects to this Interrogatory because net worth is not a relevant subject matter and has no probative value until the trial court makes a determination that there is a reasonable evidentiary basis for recovery of punitive damages, which must be more than the mere assertion of an intentional act that, as a matter of law, potentially permits recovery of punitive damages. Defendant further objects to this Interrogatory as unduly burdensome. Defendant further objects because the Interrogatories and subparts served by Plaintiffs exceed the limitations contained in Rule 1.340 of the Florida Rules of Civil Procedure. There has been no application for leave of Court to exceed the cap imposed by Rule 1.340. By responding to this Interrogatory, Defendant does not concede that any document requested is relevant to this action or admissible at trial. Defendant objects to the extent that any information that might be responsive to this Interrogatory is not relevant to any issues in dispute in this litigation and the Interrogatory is not reasonably calculated to lead to the discovery of admissible evidence. Defendant objects to the production of personal financial information prematurely in this action and without appropriate additional confidentiality order. Defendant expressly reserves the right to object to further discovery on the subject matter of this Interrogatory.

Alan Dershowitz
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ALAN DERSHOWITZ

STATE OF New York

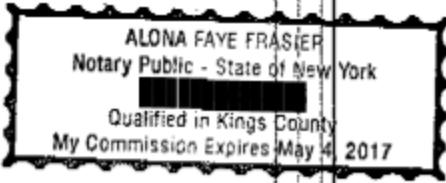
COUNTY OF New York

BEFORE ME, the undersigned authority, personally appeared this day Alan Dershowitz, who is personally known to me or produced FL Driver License, as identification, and who, after being duly sworn, did state that he executed the foregoing Answers to Interrogatories and that the same are true and correct to the best of his knowledge

Subscribed and sworn to before me this 21 day of December, 2015.

Alona Faye Frasier
Signature of Notary Public, State of Florida
New York

Alona Faye Frasier
Print / Typed Name, Notary Public



My commission expires: