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Attorney for Defendant,
Michele Colón

WORLD MISSION SOCIETY
CHURCH OF GOD

Plaintiff,

v.

MICHELE Colón,

Defendant.

) SUPERIOR COURT OF NEW JERSEY
) LAW DIVISION: BERGEN COUNTY
)
) DOCKET NO. BER-L-5274-12
)
) Civil Action
)
)
)
)
)
)

DEFENDANT'S FIRST SET OF REQUESTS FOR PRODUCTION
DIRECTED TO PLAINTIFF WORLD MISSION

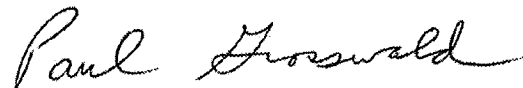
TO: MARCO A. SANTORI, , ESQ.
Nesenoff & Miltenberg, LLP
363 Seventh Avenue, 5th Floor
New York, NY 10001

SIR:

PLEASE TAKE NOTICE that Defendant Michele Colón, pursuant to New Jersey Court Rule 4:18-1, hereby demands that Plaintiff World Mission Society Church of God produce the documents requested herein to the office of Paul S. Grosswald, 140 Prospect Avenue, Suite 8S, Hackensack, New Jersey, as soon as practicable but in any event within thirty-five (35) days from the date of service of this request.

PLEASE TAKE FURTHER NOTICE that this request shall be deemed continuing, requiring the production of responsive documents discovered and/or created after the date scheduled for production.

PAUL S. GROSSWALD
Attorney for Defendant,
Michele Colón

A handwritten signature in cursive script that reads "Paul S. Grosswald". The signature is written in black ink and is positioned below the typed name and title.

Dated: December 18, 2012

The following Definitions and Instructions are incorporated by reference whenever applicable in this document:

DEFINITIONS

1. The term "archive" as used herein shall mean a copy of data on a computer drive, or on a portion of a drive, maintained for historical reference.
2. The term "backup" as used herein shall mean a copy of active data, intended for use in restoration of data.
3. The term "Big Shine" as used herein shall mean Big Shine Worldwide, Inc., with its headquarters located at 11 Harristown Road, Suite 104, Glen Rock, New Jersey, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.
4. The term "Child-Custody Hearing," as used herein shall mean the child-custody hearing, referenced in ¶¶ 27 - 28 of the Complaint, at which Ms. Colón testified on June 27, 2012, and shall include the entire hearing, including those portions of the hearing at which Ms. Colón did not testify, and those portions of the hearing, if any, which took place on dates other than June 27, 2012.
5. The term "communication" as used herein shall mean any contact oral or written, formal or informal at any time or place and under any circumstances whatsoever whereby information was transmitted.
6. The term "community outreach" as used herein shall have the same meaning as in ¶ 28 and ¶ 29 of the Proposed First Amended Complaint.
7. The term "Complaint" as used herein shall mean the Complaint filed by you against Defendant Michele Colón on July 11, 2012, bearing docket number BER-L-5274-12.
8. The term "computer" as used herein shall include but is not limited to network servers, desktops, laptops, notebook computers, employees' home computers, mainframes, PDAs (personal digital assistants, such as an iPad, iPhone, Android Phone, Blackberry, or Treo and other such handheld computing devices), cell phones and pagers.
9. The term "computer system," as used herein shall mean and refer to your entire computing environment, including but not limited to all hardware (the actual computers themselves), peripherals (e.g., terminals, printers, modems, and data storage devices), software (e.g., program applications), email systems, and backup systems, used in your office or in the households of your officers, agents, employees, representatives, experts, attorneys, and other persons you may have consulted concerning any of the facts or issues

involved in this action. This environment may consist of one large computer serving many users or one or more personal computers working individually or linked together through a network or group of networks.

10. The term "correspondence" as used herein shall mean any document relating to an exchange of information between two or more persons.
11. The term "Deacon Gonzalez" as used herein shall mean Raymond Gonzalez, who on information and belief was a Deacon of Plaintiff World Mission during the time that Ms. Colón was a member of Plaintiff World Mission (October 2009 to April 2011).
12. The terms "describe" and "explain" as used herein shall mean to provide full, complete, candid details related to the referenced subject matter.
13. The term "describe the reputation of," as used herein shall mean that you are being asked to provide a detailed description of the reputation of the referenced entity, including actual or estimated raw numbers or percentages of the number of people in a given population (1) who are familiar with the referenced entity; (2) who have a favorable opinion of the referenced entity; (3) who have an unfavorable opinion of the referenced entity; and (4) who have no opinion of the referenced entity. For those people who have a favorable opinion of the referenced entity, provide the facts that are known to or believed by such people which cause them to have such a favorable opinion of the referenced entity. For those people who have an unfavorable opinion, provide the facts that are known or believed by such people which cause them to have such an unfavorable opinion of the referenced entity. Such descriptions of reputation shall include a description and analysis of the referenced entity's online reputation, including a description of the information that is returned by search engines when the entity's name or variations thereof are searched.
14. The term "document" as used herein shall be interpreted in the broad and liberal sense and shall mean, without limitation, any writings, drawings, graphs, charts, photographs, sound recordings, video recordings, images, emails, faxes, text messages, instant messages, and any other data or data compilations, stored in any medium, whether electronic or non-electronic, from which information can be obtained either directly or, if necessary, after translation by the producing party into a reasonably usable form, and shall include the original and all copies, together with all drafts, preliminary versions, alterations, modifications, revisions, changes and amendments, whether printed or recorded or reproduced by any other electronic or mechanical process or written or reproduced by hand. All non-identical copies are separate documents within the meaning of this term. Additionally, the term "document" shall include any meta-data associated with the underlying document.
15. The term "Dozier," as used herein shall mean Dozier Internet Law, P.C., which was located at 11520 Nuckols Road, Suite 101, Glen Allen, VA 23059 as of July 11, 2012, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations,

subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.

16. The term "Dr. Lifton's thought reform model" as used herein shall have the same meaning as in Part 3 of the Five-Part Story.
17. The term "email" as used herein shall include all information relating to the original email and any reply messages or follow-up messages that were sent or received, including message contents, names of senders, names of recipients, dates and times of sending, and any other header information, as well as logs of e-mail system usage. The term "email" shall apply to all emails whether sent internally within Plaintiff World Mission or externally. The term "email" shall also apply to "deleted" emails.
18. The term "Family Court" as used herein shall mean the family court in New York State at which the Child-Custody Hearing took place.
19. The term "Five-Part Story," as used herein shall mean the story entitled "How the WMSCOG Turned My Life Upside Down," referred to in ¶ 72 - ¶ 87 of the Complaint.
20. The term "full name" as used herein shall mean all of the complete names that a person has ever been known by, including, but not limited to (1) the person's current full legal name; (2) any former legal names the person has ever used, including but not limited to maiden names or birth names; (3) any non-legal names that the person has ever used including but not limited to aliases, handles, or pseudonyms; and (4) any alternative language variations of the name that the person has ever used, such as a Korean name or an English name.
21. The term "hard drive" as used herein shall mean the primary hardware that a computer uses to store information, typically magnetized media on rotating disks.
22. The term "Head Office" as used herein shall mean the "headquarter Church in South Korea" referred to in ¶ 64 of the Complaint.
23. The term "identify" as used herein:
 - (a) when used in reference to a natural person, shall mean to state (1) his or her full name; (2) present or last known home address and phone numbers; (3) present or last known business address and telephone numbers; (4) present or last known occupation, employer and job title or description (indicating whether the information provided is "current" or "last known" in each instance); (5) if such person has, or at any time had, any relationship to you or to any other party to this action, what the relationship is or was; and (6) if the person has at any time been a member of Plaintiff World Mission, the date such person first became a member of Plaintiff World Mission, whether the person is still a member of Plaintiff World Mission, the date the person ceased to be a member of Plaintiff World

Mission (if applicable), and the reason such person ceased to be a member of Plaintiff World Mission (if applicable);

- (b) when used in reference to a business organization of any kind, shall mean to state (1) its full name; (2) the form of its organization; (3) the date of its incorporation (if applicable); (4) the state of its incorporation (if applicable); and (5) its present or last known address of its principal place of business and phone numbers (indicating whether the information provided is "current" or "last known");
 - (c) when used in reference to a document, shall mean to (1) state the type of document; (2) state its date; (3) identify each author and each recipient; (4) state any title and/or serial or file number or Bates number appearing on the document; (5) identify each of its present custodians; (6) state each of its present locations; (7) describe the substance of the statement; and (8) if such document was, but is no longer, in your possession, custody or control, or is no longer in existence, describe the disposition of the document (such as whether it is missing, lost, has been destroyed, has been transferred to others, or has been otherwise disposed of);
 - (d) when used in reference to an oral statement, shall mean to (1) identify the person who made the statement; (2) identify each person who heard the statement or who may have heard the statement; (3) state the date the statement was made; (4) state where the statement was made; (5) state whether the statement was communicated from person to person or whether it was communicated over the telephone, or over or through any other medium; and describe the substance of the statement;
 - (e) when used in reference to an act or occurrence, shall mean to state (1) the event or events constituting such act or occurrence; (2) what transpired; (3) the place of the act or occurrence; and (4) the date of the act or occurrence; and to identify (5) the persons present; (6) persons involved; and (7) all documents relating to the act or occurrence;
 - (f) when used in reference to a lawsuit, action in equity, counterclaim, or cross-claim, shall mean to (1) identify all parties to the action; (2) describe the role of each party in the action (i.e. - plaintiff, defendant, third-party defendant, cross-claimant, etc.); (3) state the docket number or case number for the action; (4) describe the nature of the action, including the causes of action alleged and the defenses raised; (5) describe the current status of the action, or the final disposition of the action (if applicable); and (6) state the jurisdiction where the action is or was pending;
 - (g) when used in any other context, means to describe or explain.
24. The term "including" as used herein shall mean "including, but not limited to."
25. The term "missionary work" as used herein shall have the same meaning as in ¶ 119 of the Complaint.

26. The term "Mr. Newton" as used herein shall mean Tyler J. Newton, as identified and described in the Complaint and the Proposed First Amended Complaint.
27. The term "Mr. [REDACTED]" as used herein shall mean Mark A. [REDACTED], as identified and described in the Proposed First Amended Complaint.
28. The term "Mr. Ross" as used herein shall mean Rick A. Ross, as identified and described in the Proposed First Amended Complaint.
29. The term "Ms. Colón" as used herein shall mean the Defendant Michele Colón, as identified and described in the Complaint and the Proposed First Amended Complaint.
30. The term "Nesenoff & Miltenberg," as used herein shall mean Nesenoff & Miltenberg, LLP, located at 363 Seventh Avenue, 5th Floor, New York, New York, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.
31. The term "network" as used herein shall mean a group of connected computers that allow people to share information and equipment (e.g., local area network [LAN], wide area network [WAN], metropolitan area network [MAN], storage area network [SAN], peer-to-peer network, client-server network).
32. The term "Pastor Lee" as used herein shall mean Daniel Lee (a.k.a. Dong Il Lee) who was the pastor of Plaintiff World Mission during the time that Ms. Colón was a member of Plaintiff World Mission (October 2009 to April 2011).
33. The term "person," or "persons," as used herein shall include any natural person, partnership, firm, corporation, trust association, joint venture, public entity, business organization or other legal entity.
34. The terms "Plaintiff World Mission," "you," or "your," as used herein shall mean World Mission Society, Church of God, a New Jersey Nonprofit Corporation, located at 305 Godwin Avenue, Ridgewood, New Jersey, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.
35. The term "Proposed First Amended Complaint" as used herein shall mean the Proposed First Amended Complaint attached as Exhibit 2 to the Certification of Diana R. Zborovsky, dated November 19, 2012, and filed along with Plaintiff World Mission's Opposition to Ms. Colón's Motion to Dismiss, and attached again as Exhibit 1 to the

Certification of Diana R. Zborovsky, dated November 19, 2012, and filed along with Plaintiff World Mission's Motion for Leave to Amend the Complaint.

36. The term "relating to" as used herein shall mean the following: analyzing, commenting on, concerning, connected to or with, consisting of, constituting, containing, dealing with, describing, discussing, evaluating, identifying, indicating, memorializing, modifying, pertaining to, recording, referring to, relating to, regarding, responding to, showing, stating, touching on, drawing a conclusion or conclusions with respect to, received by, prepared by, written by, or in any way pertinent to the referenced subject matter, including documents concerning the preparation or presentation of other documents.
37. The term "SLAPP" as used herein shall refer to a "Strategic Lawsuit Against Public Participation," and shall have the same meaning as was given to such term by LoBiondo v. Schwartz, 199 N.J. 62 (2009), or by any case or statute in any other jurisdiction where such lawsuits are unlawful.
38. The term "storage media" as used herein shall mean any media that a computer uses to store information, including hard drives or hard disks, backup tapes, magnetic tapes, CDs, DVDs, CD-ROMs, DVD-ROMs, JAZ drives, Zip drives, USB drives, floppy disks, and voice mail.
39. The term "Wernick," as used herein shall mean The Law Offices of Batya G. Wernick, Esq., located at 317 Belleville Avenue, Bloomfield, New Jersey, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.
40. The term "WMSCOG" as used herein shall mean the "World Mission Society Church of God," as that term is defined in ¶ 13 of the Complaint, and all of its past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on its behalf or under its control, and any other persons on whose behalf it is acting or under whose control it is under.
41. The term "WMSCOG entity" as used herein shall mean any of the branches or entities of the WMSCOG, including Plaintiff World Mission, and all of their past and present servants, agents, assigns, employees, attorneys, representatives, directors, officers, divisions, departments, affiliates, parent corporations, subsidiaries, predecessors, successors in interest, trustees, and any other persons acting on their behalf or under their control, and any other persons on whose behalf they are acting or under whose control they are under.

42. The term "writing" as used herein shall refer to anything that consists of letters, words, numbers, symbols, or their equivalent set down in any form.
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INSTRUCTIONS

1. These Document Requests seek documents in your possession, custody or control, including documents in the possession of your counsel. You are instructed to search for all documents which may be responsive to the requests herein.
2. You are instructed to search for all such documents in all potential repositories including computers, hard drives, archives, backups, magnetic or optically stored media, network drives or servers, or any other storage device or storage media.
3. You are instructed to produce all electronically stored information in its native electronic file format.
4. You are instructed to produce each responsive document in its entirety, without deletions, redactions, or exclusions, regardless of whether you deem one or more parts of such document to be non-responsive to these demands or inadmissible in court, unless you are asserting a claim of privilege or other protection.
5. If you are asserting a claim of privilege or other protection over a document, the document must still be produced, but the portion of the document containing such privileged or protected material may be redacted, provided that such portion is clearly labeled "redacted."
6. If you are asserting a claim of privilege or other protection over a document, so as to aid the Court and the parties hereto to determine the validity of the claim of privilege or other protection, you are instructed to, with respect to any such documents:
 - a. identify each person who prepared the document, who signed it, and over whose name it was sent or issued;
 - b. identify each person to whom the document was directed;
 - c. identify the nature and substance of the documents with sufficient particularity to enable the Court and parties thereto to identify the document;
 - d. identify the date of the document, or if no date appears thereon, the approximate date the document was prepared;
 - e. identify each person who has custody of, or control over, the documents and each copy thereof;
 - f. identify each person to whom a copy of the document was furnished, whether or not the person's name appears on the document;
 - g. identify the number of pages of the document;

- h. state the basis on which any privilege or other protection is claimed; and
 - i. state whether any non-privileged or non-protected matter is included in the document.
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7. You are instructed produce the documents in a manner that is organized and labeled to correspond with each specific demand and/or the categories within a specific demand.
 8. You are instructed to produce the documents with a Bates number attached to each document page.
 9. If documents responsive to a request have already been produced, you are instructed to supply the Bates numbers for such documents.
 10. When producing a written statement that was posted to the Internet and that you allege to be defamatory or trade libelous, you are instructed to produce a complete printout or screenshot of the webpage containing the challenged statement so that the statement appears in your production the same way it would appear if viewed on the Internet, and so that the full context of the statement will be readily apparent.
 11. Your production of documents should aim to be over-inclusive, not under-inclusive, and all questions regarding whether a document or thing needs to be produced should be resolved in favor of production.
 12. You are instructed to forward a copy of these Document Requests to all persons and entities with custodial responsibility for any responsive documents.
 13. These Requests are deemed to create a continuing obligation. Should you locate additional responsive documents subsequent to your initial production, you are instructed to produce such documents promptly.
 14. When construing this document:
 - a. the past tense shall be construed to include the present tense, and vice versa, to make the request inclusive rather than exclusive;
 - b. the singular shall be construed to include the plural, and vice versa, to make the request inclusive rather than exclusive;
 - c. the masculine gender shall include the feminine gender, and vice versa, to make the request inclusive rather than exclusive;
 - d. the words "and" and "or" shall be construed conjunctively or disjunctively as necessary to make the demands inclusive rather than exclusive;
 - e. the word "all" means "any and all";

- f. the word "any" means "any and all";
- g. the word "each" means "each and every";

- h. the word "every" means "each and every";
- i. unless otherwise defined, all words and phrases used herein shall be accorded their usual meaning in plain and ordinary usage; and
- j. the headings contained within the document requests are for convenience and reference only, and they do not define or contribute to the interpretation of the document requests.

REQUESTS FOR PRODUCTION

General

1. All documents referred to in the Complaint containing statements that are alleged to be defamatory, which have not already been produced in response to Ms. Colón's written five-day demand pursuant to R. 4:18-2, served on December 18, 2012.
2. All documents referred to in the Proposed First Amended Complaint containing statements that are alleged to be defamatory.
3. All documents relating to the allegations contained in the Complaint.
4. All documents relating to the allegations contained in the Proposed First Amended Complaint.
5. All documents that you may use to support your claims.
6. All documents identified or referred to in your answers to Ms. Colón's First Set of Interrogatories.
7. All documents relied on by you when answering Ms. Colón's First Set of Interrogatories.
8. All documents obtained from any third party, by subpoena or otherwise, relating to this case or its underlying facts.
9. All documents you provided to any third party relating to this case or its underlying facts.
10. Documents sufficient to identify each individual likely to have discoverable information that you may use to support your claims, and documents sufficient to identify the subjects of that information.
11. Any report prepared for this litigation by a person you expect to call at trial as an expert witness.
12. All correspondence sent to or received from any person you expect to call at trial as an expert witness to the extent that such communications contain facts and data considered by the expert in rendering the expert's report.
13. All documents relating to any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment against you, or to indemnify you or reimburse you for payments made to satisfy a judgment.
14. All documents relating to any lawsuits, actions in equity, or disciplinary proceedings identified in response to any of the Interrogatories, including pleadings, motion papers

and briefs, affidavits and exhibits, and documents received in discovery and documents produced in discovery.

15. All documents relating to your document retention or destruction policies or practices.
16. For each statement that you allege is defamatory or trade libelous, all documents supporting your contention that such statements are defamatory or trade libelous.
17. All documents supporting your claim that Ms. Colón and Mr. Newton engaged in a "conspiracy."

Engagement Letters

18. All engagement letters, retainer agreements, and any other contracts or agreements between Plaintiff World Mission and Dozier.
19. All engagement letters, retainer agreements, and any other contracts or agreements between Plaintiff World Mission and Wernick.
20. All engagement letters, retainer agreements, and any other contracts or agreements between Plaintiff World Mission and Nesenoff & Miltenberg.
21. All engagement letters, retainer agreements, and any other contracts or agreements between Mr. ██████z and Dozier.
22. All engagement letters, retainer agreements, and any other contracts or agreements between Mr. ██████z and Wernick.
23. All engagement letters, retainer agreements, and any other contracts or agreements between Mr. ██████z and Nesenoff & Miltenberg.

Documents Relating to the WMSCOG and Plaintiff World Mission

24. All documents relating to the doctrine, practices, beliefs, and policies of Plaintiff World Mission, including books, pamphlets, educational material (internal and external) and sermons.
25. All documents relating to the founding of Plaintiff World Mission.
26. Documents sufficient to show the size of your membership, both in Plaintiff World Mission and in all WMSCOG entities around the world.
27. All documents containing your policies and practices relating to the recruitment of new members.
28. All documents containing your policies and practices relating to community outreach.

29. All documents containing your policies and practices relating to fundraising.
30. All documents containing your policies and practices relating to member donations.
31. All documents containing your policies and practices relating to the treatment of members who express doubts about the WMSCOG religion.
32. All documents containing your policies and practices relating to restrictions imposed by Plaintiff World Mission on its members regarding the use of the Internet.
33. All documents containing your policies and practices relating to restrictions imposed by Plaintiff World Mission on its members regarding the reading or viewing of any material that is critical of the WMSCOG.
34. All documents containing your policies and practices relating to the taking of attendance at Plaintiff World Mission study sessions, worship services, and other events and activities.
35. All documents containing your policies and practices relating to how Plaintiff World Mission responds to members who miss study sessions, worship services, and other events and activities.
36. For each WMSCOG entity in the United States, all documents that it has been required to file with the IRS, as a condition of its tax exempt status, since its founding, including its Form 1023 and all Form 990s and any other filings.
37. All documents ever submitted to the IRS by any WMSCOG entity in which it describes how it was founded.
38. All documents ever submitted to the IRS by any WMSCOG entity in which it answers any question or offers any description or explanation relating to the corporate relationship or governance relationship between itself and any affiliate, parent or subsidiary churches.
39. All documents relating to your incorporation in any state, including your Certificate of Incorporation or Articles of Incorporation.
40. All documents relating to your legal authorization to do business, or to raise money, or to operate a charity, in any state where you are so authorized.
41. All documents relating to your revenue from 2009 to date, including balance sheets, bank statements, tax returns, audits, accounts receivable and accounts payable.
42. All documents relating to your current financial status, including balance sheets, bank statements, tax returns, audits, accounts receivable and accounts payable.

43. All documents relating to any assets you own, including titles to real estate, vehicles, or any other property.
44. All documents relating to compensation (including salary, expenses or other forms of compensation) of senior leaders of Plaintiff World Mission, including pastors, deacons, directors, and trustees, and all individuals identified as senior leaders of Plaintiff World Mission in your answer to Interrogatory No. 61.
45. All documents relating to your governance, including your bylaws, including all prior and current versions of your bylaws, with all amendments.
46. Any organizational charts showing the organizational structure of the WMSCOG.
47. Any organizational charts showing the organizational structure of Plaintiff World Mission.
48. All documents relating to the corporate relationship or governance relationship between Plaintiff World Mission and any affiliate, parent or subsidiary churches.
49. All documents showing the financial relationship of Plaintiff World Mission and affiliate, parent or subsidiary churches, including all payments, donations, fees, costs, or any other transfer of money or property made to or from any affiliate, parent or subsidiary church.
50. All documents relating to any control or influence exerted by the Head Office over Plaintiff World Mission and any affiliate, parent or subsidiary churches or offices.
51. All documents relating to any relationship between the WMSCOG or Plaintiff World Mission and any other business, as identified in your answer to Interrogatory No. 62.
52. All documents relating to Plaintiff World Mission's application and receipt of the Presidential Volunteer Service Award, including all documents relating to the program rules and all correspondence between Plaintiff World Mission and the office that issues the award.
53. All documents relating to the citizenship status of WMSCOG Chief Pastor Joo Cheol Kim.
54. All documents relating to the awarding of the Presidential Volunteer Service Award to WMSCOG Chief Pastor Joo Cheol Kim.
55. All documents relating to any "accolades" Plaintiff World Mission has received for its community service, as discussed in ¶ 14 of the Complaint.
56. All documents relating to complaints of Plaintiff World Mission members or former members regarding the activities of Plaintiff World Mission, the intrusion of Plaintiff

World Mission into the personal lives or family lives of its members or former members, or the financial condition or donative requests of Plaintiff World Mission.

57. All documents relating to complaints about Plaintiff World Mission or its members made by non-members who complain about Plaintiff World Mission members using aggressive or abusive tactics when recruiting or fundraising.
58. All documents relating to Plaintiff World Mission's policies or practices for gathering and responding to complaints of the members or donors.
59. All documents relating to Plaintiff World Mission's policies or practices for gathering and responding to complaints of non-members about its members.
60. All documents relating to any missionary work performed by Plaintiff World Mission or Plaintiff World Mission members, including any policies regarding who is responsible for paying for any expenses incurred when missionary work is performed, and any documents relating to the incurrence or payment of any such expenses.
61. All documents containing your policies and practices relating to the use of Non-Disclosure Agreements.
62. All Non-Disclosure Agreements that Plaintiff World Mission is currently a party to.
63. Documents sufficient to show the names and addresses of each bank where you have an account, and the bank account numbers for each account in each such bank, including credit card accounts and investment accounts.
64. All documents relating to any name changes of Plaintiff World Mission at any time in its history.
65. All documents relating to Plaintiff World Mission's purchase of the property at 305 Godwin Avenue, Ridgewood, New Jersey, including any mortgage documents.
66. All documents relating to Plaintiff World Mission's purchase of any other real estate in the last ten years, including any mortgage documents.
67. All documents relating to defamatory statements or allegedly defamatory statements about the WMSCOG or Plaintiff World Mission that were made by persons other than Ms. Colón or Mr. Newton.

Big Shine

68. All documents relating to any relationship between the WMSCOG or Plaintiff World Mission and Big Shine, as identified in your answer to Interrogatory No. 58.
69. All documents relating to any donations made by Big Shine to any WMSCOG entity.

70. All documents relating to any tax forms filed with the IRS, or any correspondence with the IRS, in which any WMSCOG entity discussed Big Shine or its relationship with Big Shine.
71. All documents relating to any physical space that is shared between any WMSCOG entity and Big Shine.
72. All documents relating to any paid personnel or unpaid volunteers that are common to any WMSCOG entity and Big Shine.
73. All documents relating to any payments, donations, fees, costs, or any other transfer of money or property made from Big Shine to any WMSCOG entity.
74. All documents relating to any payments, donations, fees, costs, or any other transfer of money or property made from any WMSCOG entity to Big Shine.
75. All documents relating to any assets that are shared between Big Shine and any WMSCOG entity.
76. All documents relating to any loans that Big Shine has helped to secure for any WMSCOG entity.
77. All documents relating to any loans that any WMSCOG entity has helped to secure for Big Shine.
78. All documents relating to any trusts for which Big Shine is the trustee and any WMSCOG entity is the beneficiary.
79. All documents relating to any trusts for which any WMSCOG entity is the trustee and Big Shine is the beneficiary.

Identities of Anonymous Speakers

80. All documents relating to the identity of "Wmscog Ex-Member" as described in ¶¶ 32 - 34 of the Complaint.
81. All documents relating to the identity of "Hailey Stevens," "haileystevens," "HaileyStevens," and "Hailey," as described in ¶¶ 37 - 51 of the Complaint.
82. All documents relating to the identity of "Hailey," as described in ¶¶ 52 - 68 of the Complaint.
83. All documents relating to the allegation in ¶ 70 of the Complaint that Ms. Colón "is a correspondent to the Newton Website."

84. All documents relating to the allegation that Ms. Colón is the author of the article described in ¶¶ 88 - 97 of the Complaint.
85. All documents relating to the identity of "HaileyStevens10" as described in ¶¶ 98 - 125 of the Complaint.
86. All documents relating to the identity of "Tommy" as described in ¶ 30 of the Proposed First Amended Complaint.
87. All documents relating to the identity of the person who sent the text message described in ¶ 73 of the Proposed First Amended Complaint.
88. All documents relating to the identity of "James Newton" as described in ¶¶ 35 - 36 of the Complaint.

Meetings with Pastor Lee

89. All documents referenced in the April 22, 2011 meeting between Pastor Lee, Deacon Raymond, Mr. [REDACTED], and Ms. Colón, including all statements that Ms. Colón was accused of posting to the Internet, and the Non-Disclosure Agreement that Ms. Colón was asked to sign.
90. All documents pertaining to the other lawsuits that Pastor Lee was referring to when he told Ms. Colón at the April 22, 2011 meeting that Plaintiff World Mission has had to sue other critics in the past.
91. All documents supporting your contention that Pastor Lee provided relationship counseling or marriage counseling to Ms. Colón and Mr. [REDACTED], as described in ¶ 17 and ¶ 18 of the Proposed First Amended Complaint.

Ms. Colón's Testimony at Child-Custody Hearing

92. All documents relating to Ms. Colón's testimony at the Child-Custody Hearing.
93. All documents containing a transcription of any portion of the Child-Custody Hearing.
94. All documents containing an opinion from the Family Court with respect to the Child-Custody Hearing.
95. All correspondence between you and any of the parties to the Child-Custody Hearing, or their attorneys.

Variance Hearing

96. All documents relating to all variances sought by you in and around Ridgewood, New Jersey, including all variance applications, all documents submitted to the Ridgewood Planning Board, and all documents received from the Ridgewood Planning Board.
97. All documents relating to any statement that you allege was made by Ms. Colón at a variance hearing.
98. All documents containing sound or video recordings which were made at or about the variance hearings that took place in Ridgewood, New Jersey on July 19, 2011 and September 6, 2011, referenced in ¶ 22 of the Complaint, including any such recordings that were made at the variance hearing location on those dates before, after, and during the variance hearings, and during any breaks in the variance hearings.
99. All documents relating to the allegations in ¶ 25 of the Complaint that Ms. Colón "actively encouraged other persons to attend the Planning Board meetings to defame Plaintiff and block its efforts at obtaining a variance approval from the Ridgewood Planning Board."

Facebook Group

100. All documents relating to how you gained access to the private Facebook Group described in ¶ 30 - ¶ 36 of the Complaint.
101. All documents relating to the allegations in ¶ 31 of the Complaint that "Newton and Colón have worked in concert and have conspired both to publish defamatory statements about Plaintiff and to solicit other members of the public to join them in their attack against Plaintiff and its reputation."
102. All documents relating to the allegations in ¶ 33 that Ms. Colón "encouraged Facebook Group members 'with aliases' - that is, with false Internet handles to hide their identities - to 'feel free to combat . . . comments on the bottom of [an] article' published by the online newspaper NorthJersey.com praising Plaintiff's and its members' volunteer flood damage cleanup efforts with their own comments."
103. All documents containing the article published by the online newspaper NorthJersey.com, which is referred to in ¶ 33 of the Complaint.
104. All documents containing the comments to the article published by the online newspaper NorthJersey.com, which is referred to in ¶ 33 of the Complaint.
105. All documents relating to the efforts of Plaintiff World Mission and its members with respect to volunteer flood damage cleanup, as referred to in the article that is referenced in ¶ 33 of the Complaint.
106. All documents relating to the allegations in ¶ 34 of the Complaint that Ms. Colón "also encouraged members of the Facebook Group to attend a third scheduled Ridgewood

Planning Board meeting to attack Plaintiff's reputation at the public hearing as a way to block Plaintiff's efforts at gaining a variance approval."

107. All documents relating to the allegation in ¶ 36 of the Complaint that Mr. Newton "published the false and defamatory statement that Plaintiff 'totally ha[s] to be laundering money' on the Facebook Group website."

Business Review Websites

108. All documents related to the allegation in ¶ 40 that "When a user posts a statement to the website www.local.com or to one of Local.com's other 100,000 plus affiliated web sites, the user causes that post to be published on each of Local. com's affiliated websites.
109. All documents related to any of the statements posted to the Business Review Websites that you allege are defamatory or trade libelous.

Rick Ross

110. Any documents relating to Rick Ross and his work as "the founder and executive director of the Rick A. Ross Institute for the Study of Destructive Cults," as described by you in ¶ 25 of the Proposed First Amended Complaint.
111. Any documents relating to the case referenced in ¶ 26 of the Proposed First Amended Complaint in which you allege that Rick Ross was found liable.
112. All documents related to any of the statements posted to the Rick Ross website that you allege are defamatory or trade libelous.

Ms. Colón's "Double Life"

113. All documents relating to the allegation in ¶ 28 of the Proposed First Amended Complaint that Ms. Colón was leading a "double life."
114. All documents relating to the allegation in ¶ 28 of the Proposed First Amended Complaint that Ms. Colón "attended services only selectively."
115. All documents relating to the allegation in ¶ 28 of the Proposed First Amended Complaint that "When [Ms. Colón] attended Bible study meetings, she only listened."
116. All documents relating to the allegation in ¶ 28 of the Proposed First Amended Complaint that "When a group of Church members organized community outreach, [Ms. Colón] only watched."
117. All documents relating to the allegation in ¶ 29 of the Proposed First Amended Complaint that Ms. Colón "was not studying the Bible; she was not worshipping with other members at services; she was not participating in community outreach."

118. All documents relating to the allegation in ¶ 29 of the Proposed First Amended Complaint that Ms. Colón "was collecting reconnaissance on the members, administration and organization of Plaintiff World Mission" and that she "used this information to launch a public assault on Plaintiff World Mission."
119. All documents relating to Ms. Colón's attendance at Plaintiff World Mission study sessions, worship services, and other events and activities.

Falsity

120. All documents that demonstrate the falsity of any statements made by Ms. Colón.
121. All documents relating to the issue of whether Plaintiff World Mission is or is not a "cult."
122. All documents relating to the issue of whether Plaintiff World Mission does or does not use "mind control" or "brainwashing" tactics.
123. All documents relating to how Plaintiff World Mission treats members who express doubts about Plaintiff World Mission's religion.
124. All documents relating to Plaintiff World Mission's belief that doubters can "infect" other members with their doubts, or that doubters run the risk of "spiritually killing" the believers.
125. All documents relating to the use of assigned seating by Plaintiff World Mission during study sessions or worship services.
126. All documents relating to the separation of men and women at Plaintiff World Mission study sessions, worship services, and other events and activities.
127. All documents relating to the process by which Plaintiff World Mission members are disciplined or punished by Plaintiff World Mission.
128. All documents relating to the process by which members are expelled from Plaintiff World Mission.
129. Documents sufficient to show both the raw number and percentage of members who have been expelled from Plaintiff World Mission over the last five years, and the reasons for such expulsions.
130. Documents sufficient to show both the raw number and percentage of members who have voluntarily left Plaintiff World Mission over the last five years, and the reasons for their decisions to leave.

131. All documents relating to the issue of whether Plaintiff World Mission does or does not "destroy families."
132. All documents relating to the issue of whether Plaintiff World Mission does or does not "take money" from its members.
133. All documents relating to the issue of whether Plaintiff World Mission is or is not a "Religious Fraud."
134. All documents relating to the issue of whether Plaintiff World Mission does or does not "deceive people."
135. All documents relating to the issue of whether Plaintiff World Mission does or does not "purposefully withhold information."
136. All documents relating to the issue of whether Plaintiff World Mission does or does not require or expect its members to devote large blocks of time to Plaintiff World Mission.
137. All documents relating to the issue of whether Plaintiff World Mission does or does not deprive its members of sleep.
138. All documents relating to the issue of whether an Internet user other than Ms. Colón had posted information alleging that Plaintiff World Mission had been using the same mind control tactics used on United States prisoners of war in North Korea.
139. All documents relating to the issue of whether Plaintiff World Mission does or does not use fear and guilt manipulation on its members.
140. All documents relating to the issue of whether Plaintiff World Mission does or does not discourage members from taking vacations by telling its members that they must be physically present in the church when Jesus returns in order to get into Heaven, and by telling its members that Jesus is going to be returning very soon.
141. All documents relating to the age of people that Plaintiff World Mission evangelizes to.
142. All documents relating to the age of people that Ms. Colón evangelized to when she was a member of Plaintiff World Mission.
143. All documents relating to Plaintiff World Mission's policies and practice of fasting as applied to adults.
144. All documents relating to Plaintiff World Mission's policies and practice of fasting as applied to children.
145. All documents relating to the WMSCOG's beliefs and teachings on marriage and divorce.

146. All documents relating to the number of Plaintiff World Mission members who are separated or divorced.
147. All documents relating to the percentage of Plaintiff World Mission members who are separated or divorced.
148. All documents relating to the reasons for Plaintiff World Mission members getting separated or divorced.
149. All documents relating to any Plaintiff World Mission members who got separated or divorced from non-members.
150. All documents relating to any Plaintiff World Mission members who got separated or divorced from other Plaintiff World Mission members who believed in the WMSCOG religion less devoutly than they did.
151. All documents relating to what married members of Plaintiff World Mission are required, expected, or encouraged to do when their spouse believes in the Plaintiff World Mission's religion less strongly than they do.
152. All documents relating to Dr. Lifton's thought reform model.
153. All documents relating to any similarities between the characteristics described in Dr. Lifton's thought reform model and the characteristics of Plaintiff World Mission.
154. All documents relating to the course in which three subjects are taught in thirty days, as referenced in ¶ 45 of the Proposed First Amended Complaint.
155. All documents relating to Mr. ██████ involvement in the course in which three subjects are taught in thirty days, as referenced in ¶ 45 of the Proposed First Amended Complaint, including documents relating to how Mr. ██████ was selected to participate in the program.
156. All documents relating to your allegation in ¶ 51 of the Proposed First Amended Complaint that "no 'representative' of the Presidential Volunteer Service Award office ever advised Defendants that 'the WMSCOG should not have nominated their Ridgewood, New Jersey location for the award.'"
157. Any documents containing the complete text, plus header information, relating to the text message referred to in ¶ 73 of the Proposed First Amended Complaint.

Actual Malice

158. All documents supporting your contention that Plaintiff World Mission is not a general public figure.

159. All documents supporting your contention that Plaintiff World Mission is not a limited public figure for purposes of this litigation.
160. For each statement that you allege to be defamatory or trade libelous and for which you contend is not discussing an issue of public concern, all documents supporting that contention.
161. All documents supporting your contention that Ms. Colón or Mr. Newton acted with malice.
162. All documents supporting your contention that Ms. Colón or Mr. Newton made false statements knowing them to be false.
163. All documents supporting your contention that Ms. Colón or Mr. Newton acted with a purpose of harming Plaintiff's business or reputation.
164. All documents relating to the allegation in ¶ 124 that the actions of Ms. Colón and Mr. Newton constitute "religious persecution."

Damages

165. All documents supporting your claim for compensatory damages.
166. All documents supporting your claim for punitive damages.
167. All documents supporting your claim for any other category of damages you are claiming.
168. All documents that support your claim for costs of suit and attorneys' fees in this action and all documents that substantiate the amount sought, including copies of all invoices received from Dozier, Wernick, and Nesenoff & Miltenberg, and any other law firm rendering legal services to you in connection with this case.
169. All documents relating to donative income lost as a result of the actions described in the Complaint.
170. All documents relating to members who have left Plaintiff World Mission as a result of the actions described in the Complaint.
171. All documents relating to any prospective members who have failed to join Plaintiff World Mission or donate money to Plaintiff World Mission as a result of the actions described in the Complaint.
172. All documents relating to any benefactors, as described in ¶ 21 of the Complaint, who have stopped donating or donated less money than they otherwise would as a result of the actions described in the Complaint.

173. All documents relating to any members of Plaintiff World Mission who have been intimidated by any of the actions described in the Complaint.
174. All documents relating to any members or former members of Plaintiff World Mission who fear harassment at work or in public as a result of any of the actions described in the Complaint.
175. All documents relating to any request from any member of Plaintiff World Mission that Plaintiff World Mission not disclose the member's identity in this litigation.
176. All documents relating to any request from any former member of Plaintiff World Mission that Plaintiff World Mission not disclose the former member's identity in this litigation.
177. All documents relating to the allegations in the Proposed First Amended Complaint that the statements at issue were read by or communicated to "millions of people."
178. All documents relating to the issue of whether but for the actions described in the Complaint, the Plaintiff World Mission would not have been damaged.
179. All documents relating to the issue of whether the actions described in the Complaint have directly and proximately caused reputational damage to Plaintiff World Mission.
180. All documents relating to the issue of whether the actions described in the Complaint have lowered Plaintiff World Mission's reputation in the minds of its members, its community, or the public at large.
181. All documents relating to the issue of whether the actions described in the Complaint have deterred third persons, including potential members and donors, from associating with Plaintiff World Mission.