

NORTH CAROLINA
WAKE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
08 CVS 18884

KAY R. HAGAN,
Plaintiff,

v.

ELIZABETH H. DOLE and THE
ELIZABETH DOLE COMMITTEE,
INC.,

**DEFENDANTS' FIRST REQUEST
FOR ADMISSIONS**

Defendants.

TO: Kay R. Hagan
c/o R. Bruce Thompson
Parker Poe Adams and Bernstein
150 Fayetteville Street Mall, Suite 1400
Raleigh, NC 27601

NOW COME the Defendants and hereby serve Defendants' First Request for Admissions

upon you. These Requests for Admissions are served pursuant to Rule 36 of the North Carolina Rules of Civil Procedure. You are required, for the purposes of this action only, to admit or deny each request within thirty (30) days of service of this discovery request. You are reminded that pursuant to Rule 37(c) of the Rules of Civil Procedure, entitled "Expenses on Failure to Admit," if you fail to admit the genuineness of any document or the truth of any matter as requested under Rule 36, and if the Defendants thereafter prove the genuineness of the document or the truth of the matter, the Defendants may apply to the Court for an order requiring you to pay the reasonable expenses incurred in making that proof, including reasonable attorneys' fees. For the purposes of Defendants' Requests for Admissions, "you" or "your" shall mean the Plaintiff, Kay R. Hagan.

FILED
2008 OCT 31 PM 12:15
WAKE COUNTY, C.S.C.
BY

REQUEST FOR ADMISSIONS

1. Admit that you attended a fundraising event on September 15, 2008 to benefit your campaign for the United States Senate, held in the home of Wendy Kammer and Woody Kaplan.

Admitted _____ Denied _____

2. Admit that **before** you attended the fundraising event held in the home of Wendy Kammer and Woody Kaplan, the Dole Committee publicly challenged your decision to attend the fundraising event.

Admitted _____ Denied _____

3. Admit you chose to attend the fundraising event in your honor after being publicly challenged by the Dole campaign for associating with national anti-religion leaders.

Admitted _____ Denied _____

4. Admit that prior to September 15, 2008, you knew that Woody Kaplan was a founder and member of the Board of Advisers to the Godless Americans Political Action Committee.

Admitted _____ Denied _____

5. Admit that prior to attending the September 15, 2008 fundraiser at the home of Woody Kaplan, the Dole Campaign publicized that Woody Kaplan was a founder and member of the Board of Advisers to the Godless Americans Political Action Committee.

Admitted _____ Denied _____

6. Admit that prior to attending the September 15, 2008 fundraiser at the home of Woody Kaplan, your campaign was aware that the Dole Campaign publicized that Woody Kaplan was a founder and member of the Board of Advisers to the Godless Americans Political Action Committee.

Admitted _____ Denied _____

7. Admit that Woody Kaplan contributed \$2300 to your United States Senate campaign committee.

Admitted _____ Denied _____

8. Admit that the costs of the fundraising event on September 15, 2008 at the home of Woody Kaplan and Wendy Kamminer were paid by Woody Kaplan and Wendy Kamminer.

Admitted _____

Denied _____

9. Admit that you are aware of the Federal Elections Commission regulations that provide a host of a fundraising event held in their personal residence may pay the costs up to \$1,000 per person / \$2,000 per couple.

Admitted _____

Denied _____

10. Admit that your United States Senate Campaign committee has reported paying no costs for the fundraising event held at the Kamminer/Kaplan home.

Admitted _____

Denied _____

11. Admit that you know that the Godless in America Political Action Committee endorses candidates for public office who "...defend ... protections for our nation's godless Americans...and support our goal of having "a place at the table" in formulating public policy".

Admitted _____

Denied _____

12. Admit that prior to September 15, 2008, you knew that Woody Kaplan was the Chairman of The Secular Coalition for America.

Admitted _____

Denied _____

13. Admit that after to September 15, 2008, you knew that Woody Kaplan was the Chairman of The Secular Coalition for America.

Admitted _____

Denied _____

14. Admit that you researched The Secular Coalition for America prior to September 15, 2008.

Admitted _____

Denied _____

15. Admit that your campaign staff researched The Secular Coalition for America prior to September 15, 2008.

Admitted _____ Denied _____

16. Admit that you researched The Secular Coalition for America after September 15, 2008.

Admitted _____ Denied _____

17. Admit that your campaign staff researched The Secular Coalition for America after September 15, 2008.

Admitted _____ Denied _____

18. Admit that The Secular Coalition for America's press statement(s) states it is "the national lobby for atheists, humanists, freethinkers and other nontheistic Americans with the unique mission of protecting their civil rights."

Admitted _____ Denied _____

19. Admit that Wendy Kaminer, in whose home your September 15, 2008 fundraising event was held, is the author of the book, *Sleeping with Extra-Terrestrials*.

Admitted _____ Denied _____

20. Admit that Wendy Kaminer, in whose home your fundraising event was held, is a member of the advisory board of The Secular Coalition for America.

Admitted _____ Denied _____

21. Admit that as a result of the fundraising event in your honor at the Kaminer/ Kaplan home, the Website DaylightAtheism.org posted the following statement about you, "Kay Hagan ought to be rewarded for inviting nonbelievers onto her platform"

Admitted _____ Denied _____

21. Admit that you knew Website DaylightAtheism.org posted the following statement about you, "Kay Hagan ought to be rewarded for inviting nonbelievers onto her platform"

Admitted _____

Denied _____

22. Admit that your campaign knew the Website DaylightAtheism.org posted the following statement about you, "Kay Hagan ought to be rewarded for inviting nonbelievers onto her platform"

Admitted _____

Denied _____

23. Admit that your campaign has received financial contributions from a website known as ActBlue.

Admitted _____

Denied _____

24. Admit that your campaign knew that ActBlue advertised the fundraising event on its website initially as being hosted in the home of Wendy Kamminer and Woody Kaplan.

Admitted _____

Denied _____

25. Admit that your campaign knew that ActBlue changed the location of the September 15, 2008 fundraising event to "private residence" after public attention was called to the anti-religion activists as hosting your fundraising event..

Admitted _____

Denied _____

This the 31 day of October, 2008.

Boyce & Isley, PLLC



Philip R. Isley
Attorneys for Defendants
Post Office Box 1990
Raleigh, N.C. 27602-1990
Telephone: (919) 833-7373

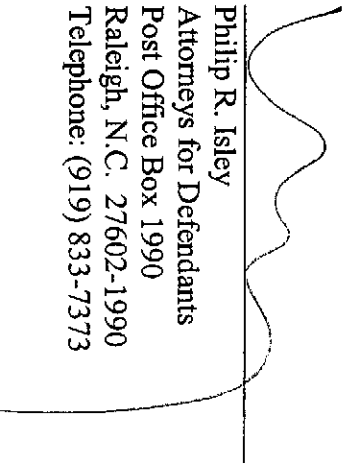
CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury that I have served a copy of the foregoing *Defendants' First Request for Admissions* by e-mail and by hand-delivery to the last known address to me as follows:

R. Bruce Thompson
Parker Poe Adams and Bernstein
Post Office Box 389
Raleigh, NC 27602

This the 31st day of October, 2008.

Boyce & Isley, PLLC



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