

IN THE CIRCUIT COURT OF THE STATE OF OREGON
FOR THE COUNTY OF MULTNOMAH

DAVID KOENIG,

Plaintiff,

v.

EVANS CLINCHY,
JENNIFER CLINCHY, and
BRIANNA (LOLA) McKISSEN

Defendants.

Case No. 23CV15424

PLAINTIFF'S INITIAL
REQUESTS FOR ADMISSION
TO DEFENDANT EVANS
CLINCHY

TO: Evans Clinchy, Defendant, and Michael Fuller, their attorney.

Pursuant to ORCP 45, plaintiff requests that defendant answer the following requests for admission within 30 days after service hereof.

FAILURE TO SERVE A WRITTEN ANSWER OR OBJECTION WITHIN THE TIME ALLOWED BY ORCP 45 B WILL RESULT IN ADMISSION OF THE FOLLOWING REQUESTS.

REQUEST NO. 1: You have never witnessed Plaintiff use physical violence against another human being.

ADMIT OR DENY:

REQUEST NO. 2: You have never witnessed Plaintiff engage in sexual harassment.

ADMIT OR DENY:

REQUEST NO. 3: You have never witnessed Plaintiff engage in sexual coercion.

ADMIT OR DENY:

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REQUEST NO. 4: You have never witnessed Plaintiff engage in sexual assault.

ADMIT OR DENY:

REQUEST NO. 5: You have disliked Plaintiff since at least 2013.

ADMIT OR DENY:

REQUEST NO. 6: You have attempted to exclude Plaintiff from Scrabble tournaments
by circumventing the typical registration process.

ADMIT OR DENY:

REQUEST NO. 7: You have called Plaintiff “an awful, awful human being.”

ADMIT OR DENY:

REQUEST NO. 8: You are a co-founder of the Scrabble tournament organization The
Collins Coalition (“CoCo”).

ADMIT OR DENY:

REQUEST NO. 9: One of the motivations for the founding of CoCo was to exclude
plaintiff from participating in its tournaments.

ADMIT OR DENY:

1 REQUEST NO. 10: Prior to April 2022, you never made a complaint to either the Word
2 Game Players Organization or the National Scrabble Players Association regarding Plaintiff.

3 ADMIT OR DENY:
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5 REQUEST NO. 11: You have never seen Plaintiff behave disruptively or aggressively at
6 a Scrabble tournament.
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8 ADMIT OR DENY:
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10 REQUEST NO. 12: At a Scrabble tournament in New Orleans in January 2017, you
11 jumped up and down, pumped your fist, and yelled loudly after an adjudication in your favor
12 during a game against Plaintiff.
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14 ADMIT OR DENY:
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16 REQUEST NO. 13: You threatened to break another Scrabble player's kneecaps, so that
17 they would have to crawl to the challenge computer.
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19 ADMIT OR DENY:
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21 REQUEST NO. 14: You frequently employed, within the Scrabble community, in person
22 and online, the catch phrase "Fuck you, you fucking fuck!"
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24 ADMIT OR DENY:
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26 DATED: MAY 16, 2023.
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/s/ Marc Mohan
Marc Mohan, Verite Law Company
OSB # 203325
1525 SE 22nd Ave.
Portland OR 97214
502-754-1656
marc@veritelawcompany.com
Attorney for Plaintiff

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1 **PROOF OF SERVICE**

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3 I certify that I caused this document to be served via e-mail and first-class mail on:

4 Defendant Evans Clinchy
5 c/o Atty: Michael Fuller
6 OlsenDaines
7 US Bancorp Tower
8 111 SW 5th Ave., Suite 3150
9 Portland, Oregon 97204
10 michael@underdoglawyer.com

11 MAY 16, 2023.

12 /s/ Marc Mohan
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