

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 JENNIFER
CLINCHY

TO: Jennifer 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 were in a romantic relationship with Plaintiff from approximately 2014 to approximately 2016.

ADMIT OR DENY:

1 REQUEST NO. 3: The last time you were in the same place as Plaintiff was July 17,
2 2018 at the wedding of Chris Lipe and Randi Goldberg in Aruba.

3 ADMIT OR DENY:
4

5 REQUEST NO. 4: At the July 17, 2018 wedding, you initiated a brief conversation with
6 Plaintiff, approaching him at the bar area and asking how he was doing.
7

8 ADMIT OR DENY:
9

10 REQUEST NO. 5: At the July 17, 2018 wedding, there was no further interaction
11 between yourself and Plaintiff following that brief conversation.
12

13 ADMIT OR DENY:
14

15 REQUEST NO. 6: Since January 6, 2017, plaintiff has only sent a direct communication
16 to you one time, apart from e-mails sent to multiple recipients, and that was on September 17,
17 2018 in response to your email of September 13, 2018.
18

19 ADMIT OR DENY:
20

21 REQUEST NO. 7: Since March 26, 2019, plaintiff has never communicated with you at
22 all, not even by copying you on a group email.
23

24 ADMIT OR DENY:
25

26 REQUEST NO. 8: You have never sought a restraining order against Plaintiff.
27

28 ADMIT OR DENY:

1
2 REQUEST NO. 9: Prior to 2022, you had never contacted law enforcement in any way
3 regarding Plaintiff.

4 ADMIT OR DENY:
5

6
7 REQUEST NO. 8: You are the co-founder of the Scrabble tournament organization The
8 Collins Coalition (“CoCo”).

9 ADMIT OR DENY:
10

11 REQUEST NO. 9: One of the motivations for the founding of CoCo was to exclude
12 plaintiff from participating in its tournaments.
13

14 ADMIT OR DENY:
15

16 REQUEST NO. 10: You said that it was your husband Evans Clinchy who held a grudge
17 against Plaintiff, and not yourself.
18

19 ADMIT OR DENY:
20

21 REQUEST NO. 11: Prior to April 2022, you never made a complaint to any of the three
22 leading Scrabble tournament organizations regarding Plaintiff.
23

24 ADMIT OR DENY:
25

26 REQUEST NO. 12: In the September 9, 2022 statement that you submitted to NASPA,
27 you included a letter to Jason Idalski with two sentences highlighted. The first highlighted
28

1 sentence is, "Like so many women, I have been sexually assaulted in the past." This sentence
2 does not refer to Plaintiff.

3 ADMIT OR DENY:
4

5 REQUEST NO. 13: In the same letter, the second highlighted sentence is, "I forfeited the
6 game because I would find it intensely distressful to relive that trauma by playing against a man
7 who has harassed and behaved disrespectfully towards women." This sentence refers to Sam
8 Kantimathi, NOT to the Plaintiff.
9

10 ADMIT OR DENY:
11

12 REQUEST NO. 14: Did you state, while employed the White House Office of
13 Technology and Policy, that it would be smarter to assassinate a Supreme Court Justice than to
14 assassinate a President?
15

16 ADMIT OR DENY:
17

18 DATED: MAY 16, 2023.
19

20 /s/ Marc Mohan
21 Marc Mohan, Verite Law Company
22 OSB # 203325
23 1525 SE 22nd Ave.
24 Portland OR 97214
25 502-754-1656
26 marc@veritelawcompany.com
27 Attorney for Plaintiff
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PROOF OF SERVICE

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

Defendant Jennifer Clinchy
c/o Atty: Michael Fuller
OlsenDaines
US Bancorp Tower
111 SW 5th Ave., Suite 3150
Portland, Oregon 97204
michael@underdoglawyer.com

MAY 16, 2023.

/s/ Marc Mohan
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