

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

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4 DAVID KOENIG	11 Case No.: 23CV15424
5 Plaintiff	12 PLAINTIFF’S ADDITIONAL
6 vs	13 REQUESTS FOR ADMISSION TO
7 EVANS CLINCHY	14 DEFENDANT JENNIFER CLINCHY
8 JENNIFER CLINCHY and	15
9 BRIANNA (LOLA) McKISSEN	16
10 Defendants	17

18 _____

19 **INTRODUCTION**

20 Plaintiff respectfully asks that defendant Jennifer Clinchy admit or deny the following requests.

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22 If defendant’s responses to any of these requests change at any time throughout this case
23 or at any time during trial, defendant must immediately tell plaintiff, and defendant must revise
24 her written responses so that they are accurate. All undefined terms in these requests have the
25 definitions prescribed by the most recent version of the Random House Unabridged Dictionary.

26

27 Additionally, plaintiff is clarifying that statements in these requests about whether you
28 “contacted a local police department” or “contacted federal officials” only refer to
29 communications in an official capacity, in which the person or persons you contacted were
30 presently working for a local police department or as federal officials. These requests DO NOT

1 refer to casual communication you had with someone who happened to be a police officer or a
2 federal official.

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4 In request 17, for examples of what is meant by “arranging for gifts to be mailed to
5 plaintiff and/or arranging for attendance for you and plaintiff together at special events” see
6 PLAINTIFF’S DECLARATION IN SUPPORT OF PLAINTIFF’S MOTION TO DETERMINE
7 THE SUFFICIENCY OF JENNIFER CLINCHY’S RESPONSES AND OBJECTIONS TO
8 REQUESTS FOR ADMISSION, (served on 8/10/2023, p.1-2) items 3 and 4.

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

13

14 **REQUESTS FOR ADMISSION**

15 15. Prior to 2022, you never contacted a local police department to make a complaint about
16 plaintiff’s behavior.

17 **Admit or Deny:**

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19 16. In the sentence, “*Again, law enforcement may simply mean a local police department, but*
20 *it may instead mean federal officials, both of whom defendant has contacted regarding plaintiff,*”
21 in DEFENDANT JENNIFER CLINCHY’S RESPONSE TO PLAINTIFF’S MOTION TO
22 DETERMINE SUFFICIENCY (filed 6/28/2023, p.6), your claim that you contacted federal

1 officials regarding the plaintiff DOES NOT refer to making a complaint about plaintiff's
2 behavior.

3 **Admit or Deny:**

4

5 17. In the sentence, "*Again, law enforcement may simply mean a local police department, but*
6 *it may instead mean federal officials, both of whom defendant has contacted regarding plaintiff,*"
7 in DEFENDANT JENNIFER CLINCHY'S RESPONSE TO PLAINTIFF'S MOTION TO
8 DETERMINE SUFFICIENCY (filed 6/28/2023, p.6), your claim that you contacted federal
9 officials regarding the plaintiff DOES refer to arranging for gifts to be mailed to plaintiff and/or
10 arranging for attendance for you and plaintiff together at special events.

11 **Admit or Deny:**

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13 August 10th, 2023.

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/s/ David Koenig

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Plaintiff, representing *pro se*

PROOF OF SERVICE

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

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Defendant BriAnna (Lola) McKissen
% Atty: Ashley L. Vaughn
Dumas & Vaughn
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August 10, 2023.

/s/ David Koenig

[Redacted signature block]

Plaintiff, representing *pro se*