

EXHIBIT B

RESPONSES FROM DEFENDANT OSKOUIE

REQUEST NO. 6

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

Response No. 6:

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 7

All documents and communications concerning any market research conducted by or for You or at Your direction concerning educational materials in the field of federal firearms licensing under United States law.

Response No. 7:

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague as the term "market research,"

ambiguous as to the meaning of “educational materials,” and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 20

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTrust.com>.

Response No. 20:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce

any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 21

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at <FFLTrust.com>.

REQUEST NO. 25

All documents and communications concerning Your knowledge of <RocketFFL.com>.

Response No. 25:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague as to the meaning of the phrase “concerning Your knowledge,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case.

REQUEST NO. 28

All documents and communications concerning Defendant Osko’s role in the creation, maintenance, administration, or management of <FFLTrust.com>.

Response No. 28:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of other Defendants or of third parties. Defendant specifically objects to this Request to the extent that it seeks

documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of “role” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 29

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

Response No. 29:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase “the

creation, acquisition, or inclusion of” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within his actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 52

All documents and communications concerning any claim You or any other Defendant has made to own any rights protected by copyright in connection with <infiniteconversions.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

Response No. 52:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase “any claim You or any other Defendant has made to own any rights protected by copyright,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery

responses.

RESPONSES FROM DEFENDANT PLATINUM

REQUEST NO. 4

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

Response No. 4:

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 5

All documents and communications concerning any market research conducted by or for You or at Your direction concerning educational materials in the field of federal firearms licensing under United States law.

Response No. 5:

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague as the term "market research," ambiguous as to the meaning of "educational materials," and seeks information or documents

that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 12

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTrust.com>.

Response No. 12:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be

located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 13

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at <FFLTrust.com>.

Response No. 13:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase “educational product,” ambiguous as to the meaning of “edition,” ambiguous as to the meaning of “by or at” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 18

All documents and communications concerning Defendant Platinum's role in the creation, maintenance, administration, or management of <FFLTrust.com>.

Response No. 18:

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of "role" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 19

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

Response No. 19:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant

specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase “the creation, acquisition, or inclusion of” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 31

All documents and communications concerning any claim You have made to own any rights protected by copyright in connection with <infiniteconversions.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

Response No. 31:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase “any claim You have made to own any rights protected by copyright,” unduly burdensome, and

seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.

RESPONSES FROM DEFENDANT OSKO

REQUEST NO. 3

All documents and communications concerning the creation, maintenance, and administration of any and every iteration of the website or other content that has appeared at <FFLTrust.com>.

Response No. 3:

Defendant specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 9

All materials upon which You or anyone working with or for You relied to create any content that did or was intended to appear at <FFLTrust.com>.

Response No. 9:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of Counterdefendants, or of third parties, including but not limited to the Bureau of Alcohol, Tobacco, Firearms and Explosives. Defendant further specifically objects to this Request on the grounds that it is overly broad, unduly burdensome, and seeks information or documents that are neither

relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent, more specific requests, and refer Counterdefendants to those documents to be produced in response to those requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 10

All documents and communications concerning every edition of every educational product sold, distributed, or displayed by or at <FFLTrust.com>.

Response No. 10:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is overly broad, vague and ambiguous as to the phrase "educational product," ambiguous as to the meaning of "edition," ambiguous as to the meaning of "by or at" in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party's claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of

subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 15

All documents and communications concerning Your role in the creation, maintenance, administration, or management of <FFLTrust.com>.

Response No. 15:

Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, ambiguous as to the meaning of “role” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 16

All documents and communications concerning the creation, acquisition, or inclusion of any federal firearms license that appears or has appeared in any materials sold, distributed, or displayed by or at <FFLTrust.com>.

Response No. 16:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant specifically objects to this Request to the extent that it seeks documents protected from discovery under the attorney-client privilege, attorney work product doctrine, or any other applicable privilege or protection. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad, vague and ambiguous as to the phrase “the creation, acquisition, or inclusion of” in the context of this Request, unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. Defendant further objects to this Request on the grounds that it is duplicative of subsequent and prior requests.

Subject to and without waiving the foregoing General and Specific Objections, and subject to a stipulated confidentiality agreement and protective order, Defendant will produce any non-privileged documents within its actual possession, custody or control that can be located after a reasonable and diligent search that are responsive to this Request.

REQUEST NO. 19

All documents and communications concerning any claim You have made to own any rights protected by copyright in connection with <infiniteconversions.com>, <TheUnitutor.com>, <FFLTrust.com>, or any other content during the past four (4) years.

Response No. 19:

Defendant specifically objects to this Request on the grounds that it seeks the production of documents that are not in the actual possession, custody, or control of Defendant, but rather are in the possession, custody, and control of third parties. Defendant further specifically objects to this Request on the grounds that it is wholly overly broad (other websites are not at issue), vague and ambiguous as to the meaning of the phrase “any claim You have made to own any rights protected by copyright,” unduly burdensome, and seeks information or documents that are neither relevant to any party’s claim or defense nor proportional to the needs of the case. This Request also calls for a legal conclusion, and Defendant is not obligated to provide legal analysis in its discovery responses.