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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA
MISSOULA DIVISION

* * * * *

MICHELE REINHART
and DAN DONOVAN,

Plaintiffs,

v.

GREG MORTENSON, DAVID
OLIVER RELIN, PENGUIN
GROUP (USA), INC., and
MC CONSULTING, INC.,

Defendants.

Cause No. CV-11-72-M-DWM
Judge: Donald W. Molloy

**PLAINTIFFS' FIRST
INTERROGATORIES
TO DEFENDANT
GREG MORTENSON**

* * * * *

To: The above-named Defendant, Greg Mortenson, and his attorney of record John M. Kauffman, Kasting, Kauffman & Mersen, P.C., 716 S. 20th Avenue, Suite 1010, Bozeman, MT 59718

COMES NOW the above-named Plaintiff and, pursuant to Rule 33, Fed.R.Civ.P., hereby requests the Defendant, Greg Mortenson, to answer the following interrogatories, in writing and under oath, within thirty (30) days after receipt thereof.

Exhibit 2

These interrogatories are continuing in nature, and Plaintiffs hereby demand that any additional information coming into the possession of the Defendant Mortenson or his counsel that would change the answer or answers in any way be promptly furnished to counsel for Plaintiffs no later than fifteen (15) days after receiving such information or documents.

DEFINITIONS AND INSTRUCTIONS

A. In answering these interrogatories, you are required to furnish all information that is available to you, including information in the possession of your attorneys or anyone else acting in your behalf or otherwise subject to your control.

B. In answering these interrogatories, you must make a diligent search of your records and of other papers and materials in your possession or available to you or your representatives.

C. If you cannot answer any interrogatory in full, answer it to the extent possible, explain why you cannot answer the remainder and state the nature of the information or knowledge that you cannot furnish.

D. If an interrogatory has subparts, answer each part in full, by way of amplifying and not limiting, your answer to the interrogatory as a whole.

E. If any interrogatory calls for a description of a document, photograph, or other writing or thing, describe it in sufficient detail so that it can be obtained from you by a request for production or subpoena.

F. If your answer to any interrogatory is derived from a document or writing, describe the writing or attach a copy as indicated above.

G. The following terms shall have the following meanings when used in these interrogatories.

1. "You" refers to all matters known to you or to any attorney, investigator, agent, employee or other person employed by, representing, or acting on behalf of you.

2. "Writing" and "document" refer to anything in written form or which is a tangible recording of speech, sounds, pictures, words or symbols, including photographs, motion pictures and sound recordings.

3. "Person" refers to individuals, corporations, partnerships, joint ventures, associations and all other forms of entities.

4. "Each" means each and every.

INTERROGATORY NO. 1:

Please identify each of the Waziri Tribesmen who are shown in the photograph in Stones Into Schools who supposedly abducted Greg Mortenson near Razmak, North Waziristan, Pakistan, for eight days in July 1996.

ANSWER:

INTERROGATORY NO. 2:

In Stones Into Schools Mortenson has included a photograph of Shaukat Ali, who Mortenson claims is a former Taliban. Please set forth each and every fact upon which Mortenson bases his contention that Shaukat Ali was a former Taliban.

ANSWER:

INTERROGATORY NO. 3:

In another photograph in Stones Into Schools Mortenson lists Mullah Mohammed as a former Taliban member. Please state each and every fact of which Mortenson is aware that tends to prove in any way that Mullah Mohammad was a former Taliban.

ANSWER:

INTERROGATORY NO. 4:

On page 268 of Three Cups of Tea Mortenson states he approached the Afghan border post after Finley returned to Islamabad. Please identify this Afghan border post and state the date he approached it.

ANSWER:

INTERROGATORY NO. 5:

Please state the name of the head interrogator Mortenson discussed on page 272 of Three Cups of Tea who demanded that Mortenson tell him where Osama Bin Ladin was.

ANSWER:

INTERROGATORY NO. 6:

Please state the elevation which Mortenson was standing when he claims to have taken a photograph of the peak of K2 as set forth opposite page 176 of the paperback copy of Three Cups of Tea.

ANSWER:

INTERROGATORY NO. 7:

Please identify every marathon Mortenson claims to have run and the dates he ran them.

ANSWER:

INTERROGATORY NO. 8:

Please state the date Mortenson climbed the north face of Mount Baker, Anna Purna IV, Baruntse, and several other Himalayan peaks, as he stated on page 44 of Three Cups of Tea.

ANSWER:

INTERROGATORY NO. 9:

Please state the total number of schools Mortenson claims he built in Pakistan and Afghanistan, identifying the locations of each and the dates each were built.

ANSWER:

INTERROGATORY NO. 10:

If Mortenson, or anyone acting on Mortenson's behalf, has retained or conferred with any expert witness concerning the incident alleged in Plaintiffs' Second Amended Complaint who is expected to be called as an expert witness at trial, please state:

- a. The name of each such expert witness.
- b. The subject matter on which each such expert is expected to testify.
- c. The substance of the facts and opinions to which each such expert is expected to testify.
- d. A summary of the grounds for each such opinion.

ANSWER:

INTERROGATORY NO. 11:

Please identify each and every person known to Mortenson or Mortenson's attorneys or investigators as having any knowledge whatsoever of any relevant

facts concerning the incidents described in Plaintiffs' Second Amended Complaint. This request is intended to include all witnesses known to Mortenson or Mortenson's attorneys, insurance claims agents or anyone acting on his behalf.

ANSWER:

INTERROGATORY NO. 12:

Please identify each and every policy of insurance extending coverage to Defendant Mortenson against liability for any of the allegations contained in the Plaintiffs' Second Amended Complaint, including the monetary limits of coverage for each such policy.

ANSWER:

INTERROGATORY NO. 13:

Please state the date Ghulam Parvi telephoned you and told you that Mullah at Chakpo had declared a fatwa against you and state the name of the Mullah who did so, all as you claim on page 184 of Three Cups of Tea.

RESPONSE:

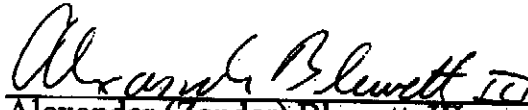
INTERROGATORY NO. 14:

Did Mortenson or Central Asia Institute ever accept any money from the United States government at any time?

RESPONSE:

DATED this 20th day of June, 2011.

HOYT & BLEWETT PLLC



Alexander (Zander) Blewett, III
Anders Blewett
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that, on this 20th day of June, 2011, a copy of the foregoing document was served on the following persons by the following means:

- CM/ECF
- Hand Delivery
- Mail
- Overnight Delivery Service
- Fax
- E-Mail

1. Clerk, U.S. District Court
2. John M. Kauffman
Kasting, Kauffman & Mersen, P.C.
716 S. 20th Avenue, Suite 1010
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