

Alexander (Zander) Blewett, III
Anders Blewett
HOYT & BLEWETT PLLC
501 Second Avenue North
P.O. Box 2807
Great Falls, MT 59403-2807
Phone: (406) 761-1960
Fax: (406) 761-7186
E-mail: zblewett@hoytandblewett.com
ablewett@hoytandblewett.com

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
REQUESTS FOR ADMISSION
TO DEFENDANT GREG
MORTENSON**

* * * * *

To: The above-named Defendants, 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 Plaintiffs, pursuant to Rule 36 of the Federal Rules of Civil Procedure, hereby requests Defendant, Greg Mortenson (Mortenson) to admit or deny the following Requests For Admission within thirty (30) days of receipt or service thereof.

REQUEST FOR ADMISSION NO. 1:

Please admit that Central Asia Institute was not a registered nonprofit entity in Afghanistan prior to 2008.

RESPONSE:

REQUEST FOR ADMISSION NO. 2:

Please admit that Mortenson was never kidnapped by Mansur Khan Mahsud or any member of his family.

RESPONSE:

REQUEST FOR ADMISSION NO. 3:

Please admit that Mortenson was not detained against his will by Mansur Khan Mahsud or his family.

RESPONSE:

REQUEST FOR ADMISSION NO. 4:

Please admit that Mansur Khan Mahsud is not a member of the Taliban.

RESPONSE:

REQUEST FOR ADMISSION NO. 5:

Please admit that in 1996 there were no Taliban in the South Waziristan Agency of Pakistan.

RESPONSE:

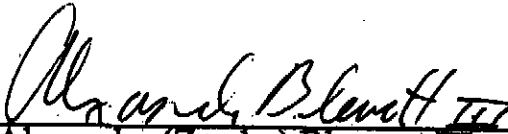
REQUEST FOR ADMISSION NO. 6:

Please admit that in 1996 there were no Taliban in the federally administered tribal areas of Pakistan.

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
- 2,3 Mail
- Overnight Delivery Service
- Fax
- E-Mail

1. Clerk, U.S. District Court
2. John M. Kauffman
Kasting, Kauffman & Mersén, P.C.
716 S. 20th Avenue, Suite 1010
Bozeman, MT 59718
Attorneys for Defendant Mortenson
3. Jonathan M. Herman
Dorsey & Whitney LLP
51 West 52nd Street
New York, NY 10019-6119
Attorneys for Defendant Penguin

HOYT & BLEWETT PLLC



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