

# Exhibit G

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

|                   |   |                                    |
|-------------------|---|------------------------------------|
| _____             | ) |                                    |
| JOHN DOE,         | ) |                                    |
|                   | ) |                                    |
| Plaintiff,        | ) |                                    |
|                   | ) | CIVIL ACTION NO. 3:16-CV-30184-MAP |
| v.                | ) |                                    |
|                   | ) |                                    |
| WILLIAMS COLLEGE, | ) |                                    |
|                   | ) |                                    |
| Defendant.        | ) |                                    |
| _____             | ) |                                    |

**PLAINTIFF’S SECOND SET OF INTERROGATORIES TO DEFENDANT**

Pursuant to Fed. R. Civ. P. 33, Plaintiff John Doe requests that Defendant Williams College answer the following interrogatories under oath, separately and fully, within thirty (30) days of the time of service in accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure. In answering these interrogatories, please furnish all information that is available to you including, but not limited to, information in the possession of your principals, agents, attorney(s) and accountants; not merely information known to the personal knowledge of the person preparing the answers.

These requests are deemed to be continuing, and you have the duty to supplement your responses if you obtain further information between the time answers are served and the time of trial.

**Definitions**

a. These interrogatories incorporate by reference the definitions set forth in Local Rule 26.5(c).

b. The terms "Williams," "the College," and "you" mean the Defendant Williams College and any person acting or purporting to act on its behalf including, but not limited to, its officers, directors, employees, partners, corporate parent, subsidiaries, or affiliates.

c. The term "Plaintiff" along with any variations thereof, mean the Plaintiff John Doe and any person acting or purporting to act on his behalf.

d. The term "Complaint" means the Third Amended Complaint in this case.

e. The term "incident" shall refer to the entire series of events involving John Doe as described in the Complaint.

f. The term "subject matter of this litigation" shall refer to the incident, as well as all other allegations of physical assaults and sexual misconduct made against College students from July 1, 2007 to July 15, 2017.

g. The term “document” shall have the meaning set forth in Rule 34 of the Federal Rules of Civil Procedure and shall refer to any means by which information is recorded or retained, including, without limitation, originals, non-identical copies, drafts, or electronic or computer data storage. “Writings” shall include, without limitation, all materials or any kind including, but not limited to, orders, instructions, directives, regulations, reports, interviews, statements, summaries, complaints, transcripts, memoranda, notes, correspondence, and logs. “Documents” also refers to microfilm, microfiche, videotape, motion pictures, audio tape, and any other electronic or mechanical recording.

h. The term “identify” or “identity” when used to respect to persons is a request for you to supply the full name, address, and phone number of the person to be identified.

### **Interrogatories**

1. Please state the name, address, job title, and employer of the person(s) answering these interrogatories.
2. Identify all persons – students, faculty, administrators, and/or consultants – who participated in revising the section of the 2013-2014 Student Code of Conduct that addresses non-consensual sex and defines consent; the 2014-2015 Student Code of Conduct’s definition of consent; the Statement on Sexual Assault and Other Sexual Misconduct effective October 2014; and the 2015-2016 Student Code of Conduct’s policy on Rape, Sexual Assault, and Sexual Misconduct.
3. Identify the dates of any meetings and/or correspondence devoted, at least in part, to making such revisions, and the persons who attended these meetings and/or participated in this correspondence.

Date: December 26, 2017

**JOHN DOE  
PLAINTIFF**

By:           /s/ Stacey Elin Rossi            
STACEY ELIN ROSSI, BBO# 681084  
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### **CERTIFICATE OF SERVICE**

This document was served electronically upon all counsel of record by email on December 26, 2017.

          /s/ Stacey Elin Rossi            
STACEY ELIN ROSSI