

NORTH CAROLINA
MOORE COUNTY

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO: 25CV001930-620

Heather Ammel)
Plaintiff)
)
v.) Motion for Protective Order
)
Kyrsten Sinema)
Defendant)
_____)

Pursuant to Rule 26(c) NCRCP, Kyrsten Sinema (Defendant) objects to Plaintiff's First Interrogatories, Request for Production of Documents, and Request for Admissions served on Defendants (Plaintiff's Discovery), and moves for a protective order. In support of this Motion, Defendant shows the Court that:

1. On 30 September 2025, Plaintiff filed her complaint.
2. On 3 November 2025, Defendant through counsel accepted service of the issued summons and complaint and Plaintiff's Discovery.
3. Plaintiff's Discovery (Exhibit 1) is incorporated by reference.
4. Contemporaneous with this Motion, Defendant filed a Rule 12(b)(2) motion to dismiss the complaint ("Motion to Dismiss"). The Motion to Dismiss and supporting materials are incorporated.
5. The Motion to Dismiss asserts that North Carolina's exercise of jurisdiction over Defendant violates her due process rights under the Fourteenth Amendment to the United States Constitution.
6. Compelling Defendant to respond to Plaintiff's Discovery would be appropriate only if this Court had personal jurisdiction and the power to force Defendant to engage in discovery and participate in this litigation, all of which is emphatically contested in the Motion to Dismiss.
7. If the Motion to Dismiss is granted (and affirmed after exhaustion of appeals), the case will be dismissed and Plaintiff's Discovery is moot.

8. Defendant is entitled to resolve her Motion to Dismiss prior to being compelled to respond to Plaintiff's Discovery.

9. Defendant does not waive and in fact preserves all specific objections to confidential, sensitive personal information, such as extensive bank and credit card records, which Defendant will assert if after exhaustion of appeals she must respond to Plaintiff's Discovery.

Wherefore, pursuant to Rule 26(c) NCRCP, Defendant objects to the entirety of Plaintiff's Discovery and moves for a Protective Order preventing discovery that would violate Defendant's constitutional rights unless and until Defendant's Motion to Dismiss is denied (after exhaustion of appeals) and this Court has personal jurisdiction to compel Defendant to participate in this litigation and respond to Plaintiff's Discovery.

THE ARMSTRONG LAW FIRM, P.A.

BY: /s/ Lamar Armstrong, Jr.
L. Lamar Armstrong, Jr. (NCSB# 9679)
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Certificate of Service

I /s/ L. Lamar Armstrong, Jr. certify that on 1 December 2025 I served this motion for protective order by email on plaintiff's attorneys, Thomas Van Camp (thomasv@vancamplaw.com) and Mary Catherine Coltrane (marycatherine@vancamplaw.com).

STATE OF NORTH CAROLINA
COUNTY OF MOORE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO.: 25CV001930-620

HEATHER AMMEL,)
Plaintiff,)
vs.)
KYRSTEN SINEMA,)
Defendant.)

PLAINTIFF'S FIRST REQUESTS FOR
ADMISSIONS TO DEFENDANT

NOW COMES Plaintiff, Heather Ammel, by and through undersigned counsel, pursuant to Rules 26 and 36 of the North Carolina Rules of Civil Procedure, serves the following written Requests for Admissions upon Defendant.

INSTRUCTIONS

You are required to answer these Requests for Admissions separately and fully in writing under oath within sixty (60) days after service hereof, and to serve a copy of your answers on the undersigned counsel for Plaintiff within sixty (60) days after date of service thereof.

These Requests for Admissions are governed by the definitions and instructions set forth below and are continuing until the date of trial. If any individual response to Plaintiff's First Requests for Admissions is anything other than an unequivocal admission, please state all facts and identify all documents, evidence, or things that you contend support your response.

If you object, refuse to answer any request in whole or part, or if you claim any form or privilege whether based on a statute, or otherwise, as the ground for not answering a request, or any portion thereof, set forth in detail, each and every fact upon which a privilege or objection is based, and include such sufficient facts upon which the court may make a full determination where the claim or privilege is valid.

DEFINITIONS

The following words have the following meanings:

1. The term “Plaintiff” shall mean Heather Ammel, and any attorney working on her behalf.
2. The terms “Defendant,” “you,” or “your” shall mean Kyrsten Sinema, or any attorney, agents, employees, entity (corporation, partnership, limited liability company, etc.), partners, or any other person acting on your behalf.
3. “Matthew Ammel” means Plaintiff’s husband, Matthew Ammel.
4. The term “marriage,” “marital,” or “married” refers to the marriage between Plaintiff and Matthew Ammel.
5. The terms “children” or “minor children” refers to the children of Plaintiff and Matthew Ammel.
6. The term “date of separation” means 1 November 2024 and refers to the separation between Plaintiff and Matthew Ammel.
7. The term “communication” shall mean any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussion, interviews, consultations, agreements, and other understandings between or among two or more persons, by any means or mode of conveying information, including but not limited to telephone, facsimile, computer, or the like.

REQUESTS FOR ADMISSIONS

1. Please **ADMIT** Matthew Ammel assisted you in preparing these discovery responses.
Admit Deny
2. Please **ADMIT** you knew Matthew Ammel was married when Matthew Ammel began working for you in April 2022.
Admit Deny
3. Please **ADMIT** you knew Matthew Ammel resided in Moore County, North Carolina with Plaintiff and their minor children, when Matthew Ammel began working for you in April 2022.
Admit Deny
4. Please **ADMIT** you traveled alone with Matthew Ammel to Napa Valley, California in the

fall of 2023.

Admit Deny

5. Please **ADMIT** that while in Napa Valley, California, you and Matthew Ammel traveled to wineries and picked grapes together.

Admit Deny

6. Please **ADMIT** that while in Napa Valley, California, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

7. Please **ADMIT** you met Plaintiff at the U2 concert in Las Vegas, Nevada in December 2023.

Admit Deny

8. Please **ADMIT** Matthew Ammel introduced Plaintiff to you as his wife at the U2 concert in Las Vegas, Nevada in December 2023.

Admit Deny

9. Please **ADMIT** you knew Plaintiff and Matthew Ammel were married while Matthew Ammel worked for you as your security guard and senate staff member.

Admit Deny

10. Please **ADMIT** you learned, while Matthew Ammel worked for you, Plaintiff and Matthew Ammel have children together.

Admit Deny

11. Please **ADMIT** you have met Plaintiff and Matthew Ammel's minor children.

Admit Deny

12. Please **ADMIT** you and Matthew Ammel have messaged each other on Signal, the messaging app.

Admit Deny

13. Please **ADMIT** you and Matthew Ammel messaged each other outside of work events.

Admit Deny

14. Please **ADMIT** you messaged Matthew Ammel while he was residing in North Carolina with Plaintiff and their minor children.

Admit Deny

15. Please **ADMIT** you have deleted messages you have sent and/or received from Matthew Ammel while he was residing in North Carolina with Plaintiff and their minor children.

Admit Deny

16. Please **ADMIT** you sent a picture of yourself wrapped in a towel to Matthew Ammel.

Admit Deny

17. Please **ADMIT** you asked Matthew Ammel if you could assist him with his mental health.

Admit Deny

18. Please **ADMIT** you asked Matthew Ammel why he was intimidated by you because you only want to be intimidating to your opponents, not to people you like.

Admit Deny

19. Please **ADMIT** you requested Matthew Ammel bring MDMA drugs on a work trip so that you could guide him through a psychedelic experience.

Admit Deny

20. Please **ADMIT** you and Matthew Ammel messaged about different sex positions, specifically missionary style with the lights on.

Admit Deny

21. Please **ADMIT** you told Matthew Ammel the missionary sex position was “Boring!”

Admit Deny

22. Please **ADMIT** Matthew Ammel messaged you at a baseball game stating he was going to start a chant yelling, “fuck the troops,” to which you responded you would “fuck the hot ones.”

Admit Deny

23. Please **ADMIT** you requested Matthew Ammel attend the Extra Innings Festival in Phoenix, Arizona, in March 2024, with you and your friends.

Admit Deny

24. Please **ADMIT** that during and after the Extra Innings Festival, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

25. Please **ADMIT** after the Extra Innings Festival, you and Matthew Ammel traveled to San Francisco, California together.

Admit Deny

26. Please **ADMIT** that while you and Matthew Ammel were in San Francisco, California together, you invited Matthew Ammel into your hotel room.

Admit Deny

27. Please **ADMIT** that while you and Matthew Ammel were in San Francisco, California together, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

28. Please **ADMIT** in April 2024, while Matthew Ammel was on a work trip in Maryland, you invited him over to your apartment in Washinton, D.C.

Admit Deny

29. Please **ADMIT** Matthew Ammel has stayed overnight with you at your apartment in Washinton, D.C.

Admit Deny

30. Please **ADMIT** that while Matthew Ammel was at your apartment in Washington, D.C., you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

31. Please **ADMIT** in May 2024, you paid for Matthew Ammel to receive psychedelic treatment in Nashville, Tennessee.

Admit Deny

32. Please **ADMIT** after Matthew Ammel's psychedelic treatment appointment in Nashville, Tennessee in May 2024, Matthew Ammel flew to Napa Valley, California to attend a concert festival with you and your friends.

Admit Deny

33. Please **ADMIT** after the concert festival in Napa Valley, California, you, your friends, and Matthew Ammel all stayed in a private Airbnb together.

Admit Deny

34. Please **ADMIT** that while you and Matthew Ammel were in Napa Valley, California, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

35. Please **ADMIT** around May 2024, you purchased a theragun for Matthew Ammel.

Admit Deny

36. Please **ADMIT** you told Matthew Ammel to bring his theragun over to your apartment so that you could "work on his back."

Admit Deny

37. Please **ADMIT** around May or June 2024, you knew Matthew Ammel stopped wearing his wedding ring.

Admit Deny

38. Please **ADMIT** in June 2024, per your request, Matthew Ammel attended a wedding with you in New York City as your security and guest.

Admit Deny

39. Please **ADMIT** that while you and Matthew Ammel were in New York City, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

40. Please **ADMIT** that after the wedding in New York City, you and Matthew Ammel flew to your house in Scottsdale, Arizona.

Admit Deny

41. Please **ADMIT** you and Matthew Ammel stayed alone at your house in Scottsdale, Arizona.

Admit Deny

42. Please **ADMIT** that while you and Matthew Ammel were in Scottsdale, Arizona, you and Matthew Ammel engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act.

Admit Deny

43. Please **ADMIT** in June 2024, you offered Matthew Ammel a salary position and placed him on your senate staff.

Admit Deny

44. Please **ADMIT** on 23 June 2024, you messaged Matthew Ammel stating, "I keep waking up during my sleep and reaching over for your arms to hold me."

Admit Deny

45. Please **ADMIT** in July 2024, you and Matthew Ammel, took Plaintiff and Mr. Ammel's minor child, Clara, to a Green Day concert in Washington, D.C., and you provided Clara a tour of the United States Capitol.

Admit Deny

46. Please **ADMIT** in October 2024, you messaged Matthew Ammel stating, "I miss you. Putting my hand on your heart. I'll see you soon."

Admit Deny

47. Please **ADMIT** in October 2024, after you messaged Matthew Ammel stating, "I miss you. Putting my hand on your heart. I'll see you soon," Plaintiff responded to the message stating, "are you having an affair with my husband? You took a married man away from his family."

Admit Deny

48. Please **ADMIT** in October 2024, you, Matthew Ammel, Plaintiff, and their minor children attended a Taylor Swift concert in Miami, Florida.

Admit Deny

49. Please **ADMIT** in October 2024, after the Taylor Swift concert, you knew Plaintiff flew back home to Moore County, North Carolina, and Matthew Ammel stayed behind to travel with you to Las Vegas, Nevada for work.

Admit Deny

50. Please **ADMIT** you knew, after Matthew Ammel returned from Las Vegas, Nevada, Plaintiff and Matthew Ammel went on an anniversary trip together to Nashville, Tennessee.

Admit Deny

51. Please **ADMIT** you knew that after their anniversary trip, Plaintiff returned home to Moore County, North Carolina, and Matthew Ammel went on a work trip with you to Saudi Arabia.

Admit Deny

52. Please **ADMIT** you knew that shortly after Matthew Ammel returned home to Moore County, North Carolina, after the Saudi Arabia trip, Matthew Ammel moved out of the marital residence.

Admit Deny

53. Please **ADMIT** you knew Plaintiff and Matthew Ammel separated 1 November 2024.

Admit Deny

54. Please **ADMIT** you are currently in a romantic and/or relationship with Matthew Ammel.

Admit Deny

55. Please **ADMIT** that on one or more occasions since April 2022, you have traveled to the State of North Carolina to visit Matthew Ammel.

Admit Deny

56. Please **ADMIT** that on one or more occasions since April 2022, you and Matthew Ammel have engaged in physical acts of intimacy, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act in North Carolina.

Admit Deny

57. Please **ADMIT** your romantic relationship with Matthew Ammel began at a time when Plaintiff and Matthew Ammel were married.

Admit Deny

58. Please **ADMIT** your romantic relationship with Matthew Ammel began at a time when Plaintiff and Matthew Ammel were married, prior to their date of separation.

Admit Deny

59. Please **ADMIT** when your romantic relationship with Matthew Ammel began, you knew Plaintiff and Matthew Ammel were married.

Admit Deny

60. Please **ADMIT** that, prior to 1 November 2024, you had in-person conversations with Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

61. Please **ADMIT** that, prior to 1 November 2024, you had telephone conversations with Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

62. Please **ADMIT** that, prior to 1 November 2024, you sent messages to Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

63. Please **ADMIT** that, prior to 1 November 2024, you received messages from Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

64. Please **ADMIT** that, prior to 1 November 2024, you sent e-mails to Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

65. Please **ADMIT** that, prior to 1 November 2024, you received e-mails from Matthew Ammel which were romantic and/or sexual in nature.

Admit Deny

66. Please **ADMIT** that, prior to 1 November 2024, you sent messages to Matthew Ammel on social media, including but not limited to cellular apps, which were romantic and/or sexual in nature.

Admit Deny

67. Please **ADMIT** that, prior to 1 November 2024, you received messages from Matthew Ammel on social media, including but not limited to cellular apps, which were romantic and/or sexual in nature.

Admit Deny

68. Please **ADMIT** that, prior to 1 November 2024, you had physically romantic and/or sexual contact with Matthew Ammel.

Admit Deny

69. Please **ADMIT** that, prior to 1 November 2024, you had sexual intercourse with Matthew Ammel.

Admit Deny

70. Please **ADMIT** that, prior to 1 November 2024, you had sexual intercourse with Matthew Ammel in the State of North Carolina.

Admit Deny

71. Please **ADMIT** that, prior to 1 November 2024, you willfully and intentionally seduced, enticed, and alienated the affections of Matthew Ammel.

Admit Deny

This the 30 day of September 2025.

VAN CAMP, MEACHAM & NEWMAN, PLLC
Attorneys for Plaintiff

BY:



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STATE OF NORTH CAROLINA
COUNTY OF MOORE

**IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO.: 25CV001930-620**

NOW COMES Plaintiff, Heather Ammel, by and through undersigned counsel, pursuant to Rules 26 and 34 of the North Carolina Rules of Civil Procedure and hereby propounds and serves the following written Requests for Production of Documents upon Defendant.

INSTRUCTIONS

You are required to produce for inspection and copying all documents described below within forty-five (45) days after service hereof, and to serve a copy of your responses on the undersigned counsel for Plaintiff within forty-five (45) days after date of service thereof, and to release for inspection and photocopying each of the documents requested or as an alternative to production, you may attach a photocopy of the requested documents to your response.

These Requests for Production shall be continuing in nature until the date of trial, and you are required to serve supplemental responses to these requests as required by Rule 26 of the North Carolina Rules of Civil Procedure.

In responding to each request, furnish all documents which are available to you. This request is intended to discover not only documents in your possession, but also documents in the possession of your attorneys, investigators, agents, accountants, and other persons acting on your behalf, documents in the possession of any business in which you have an interest in, and documents which are obtainable by you from financial institutions, credit card companies and other entities where you have had accounts.

If you object, refuse to answer any request in whole or part, or claim any form or privilege whether based on a statute, or otherwise, as the ground for not answering a request, or any portion thereof, set forth in detail, each and every fact upon which a privilege or objection is based, and include such sufficient facts upon which the court may make a full determination where the claim or privilege is valid.

If you consider any document called for in these requests to be privileged from production, then you must include in your response a list of documents withheld from production, identifying each document by date, addressee, author, title, and subject matter. In addition, you should identify those persons who have seen the document or who were sent copies. Finally, you should state the ground(s) upon which each such document is considered privileged.

If any document requested was at one time in existence but is no longer in existence, please state for each such document;

- (a) The type of document;
- (b) The date upon which it ceased to exist;
- (c) The circumstances under which it ceased to exist;
- (d) The identity of all persons having knowledge of the circumstances under which it ceased to exist; and
- (e) The identity of all persons having knowledge of the contents thereof.

The documents produced in response to each request shall be produced as they are kept in the usual course of business or shall be organized and labeled to correspond to the categories in the request pursuant to North Carolina Rule of Civil Procedure 34(b).

DEFINITIONS

The following words have the following meanings:

1. “Document” or “documents” includes, without limitation, and shall mean the embodiment, in any form, of any attempt, by any means, to utilize, memorialize, or communicate thoughts or information and it includes originals or drafts of any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including all outlines and proposals of any such documents (whether or not actually used), and all copies thereof which are different in any way from the original, to which you have or have had

access or which may be in your possession, custody or control, or of which you have knowledge. As such, “document” includes, but is not limited to, any paper, contract, policy, endorsement, book, account, photograph, agreement, correspondence, memorandum, letter, telegram, facsimile, telecopy, e-mail, object, report, record, notes, intra-office communication, invoice, pamphlet, log, periodical, cable, study, diary, working paper, chart, graph, index, tape, data sheet or data processing care, floppy disk, disk, e-mail, printed circuit, check, time sheet, ledger, bill, computation, schedule, analysis, summary, instruction, computer memory bank, brief, pleading or other litigation paper, as well as any other tangible thing on which thoughts or information are recorded in writing, sound, pictures, punches, circuits, programs, or other written, recorded, transcribed, filmed, or other graphic matter however produced or reproduced.

2. The term “Plaintiff” shall mean Heather Ammel, and any attorney working on her behalf.

3. The terms “Defendant,” “you,” or “your” shall mean Kyrsten Sinema, or any attorney, agents, employees, entity (corporation, partnership, limited liability company, etc.), partners, or any other person acting on your behalf.

4. “Matthew Ammel” means Plaintiff’s husband, Matthew Ammel.

5. The terms “children” or “minor children” refers to the children of Plaintiff and Matthew Ammel.

6. The term “person” or “persons” shall include any natural persons, firms, partnerships, associations, joint ventures, and corporations.

7. The term “entity” shall mean all legal and business organizations, including but not limited to sole proprietorships, corporations, general partnership, limited partnership, limited liability company, unions, association, and joint ventures.

8. The term “income” means gross incomes from all sources, including, but not limited to, wages, salaries, bonuses, commission, severance pay, deferred compensations, interest, dividends, distributions, annuities, capital gains, disability pay, gifts and prizes.

9. The term “date of separation” means 1 November 2024 and refers to the separation between Plaintiff and Matthew Ammel.

10. The terms "current date," "present," or "date of response" shall mean the last day of the month immediately preceding the month in which you serve your responses to these requests.

11. The term "net value" shall mean the fair market value reduced by any indebtedness for which the particular item or property is collateral or security.

12. The male gender includes the female gender, and the singular noun or pronoun includes the plural.

13. The term "communication" shall mean any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussion, interviews, consultations, agreements, and other understandings between or among two or more persons, by any means or mode of conveying information, including but not limited to telephone, facsimile, computer, or the like.

14. The term "relating to" shall mean consisting of, referring to, evidencing, reflecting, pertaining to, memorization, supporting or providing a basis for, or in any way logically or factually connecting to the matter discussed.

REQUESTS FOR PRODUCTION OF DOCUMENTS

1. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession, which were used or referred to in order to respond to Plaintiff's First Set of Interrogatories.

RESPONSE:

2. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all diaries, journals, logs, calendars or other similar records that you have kept, made or used that relate to the facts of this case from 1 April 2022 to present.

RESPONSE:

3. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all correspondence between you and Matthew Ammel from 1 April 2022, to present, including, but not be limited to, electronic mail, notes, letters, text message correspondence, Facebook, WhatsApp, Signal, and/or other written notes.

RESPONSE:

4. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all correspondence between you and Plaintiff from 1 April 2022, to present, including, but not be limited to, electronic mail, notes, letters, text message correspondence, Facebook, WhatsApp, Signal, and/or other written notes.

RESPONSE:

5. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all correspondence between you and any third party (other than your attorneys) that relate to Plaintiff, Matthew Ammel, the minor children, or the subject matter of this litigation from 1 April 2022, to present, including, but not be limited to, electronic mail, notes, letters, text message correspondence, Facebook, WhatsApp, Signal, and/or other written notes.

RESPONSE:

6. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any

and all correspondence between you and the minor children that relate to Plaintiff, Matthew Ammel, any third party, or the subject matter of this litigation from 1 April 2022, to present, including, but not be limited to, electronic mail, notes, letters, text message correspondence, Facebook, WhatsApp, Signal, and/or other written notes.

RESPONSE:

7. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to complete copies of your monthly telephone account statements indicating calls made and received and text messages sent and received by you and Matthew Ammel from 1 April 2022, to present.

RESPONSE:

8. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to complete copies of all telephone records, including itemized details of calls made to and from any such telephone lines, for any telephone services held in your name jointly or with another person, including but not limited to land lines and cellular phones, for the period 1 April 2022 to present.

RESPONSE:

9. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all tape recordings of any conversation between you and Matthew Ammel, Plaintiff, or any other person regarding this lawsuit.

RESPONSE:

10. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all back-up tapes containing email and other electronically stored information from computers that you used for personal use at any time from 1 April 2022 to present.

RESPONSE:

11. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to all exact copies of all hard drives on the desktop computers, laptop computers, notebook computers, personal digital assistant computers, servers, and other electronic media which you used for personal use at any time from 1 April 2022 to present.

RESPONSE:

12. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to all exact copies of all data that was stored, retrieved, downloaded, restored, reconstructed, or moved, deleted, salvaged, regenerated, and/or forensically extracted from any computer devices used by you for personal use at any time from 1 April 2022 to present.

RESPONSE:

13. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all photographs, recordings, whether audio, video or both, depicting Matthew Ammel or his

voice that relate to the facts of this case and transcripts, if any, of said recordings from 1 April 2022 to present.

RESPONSE:

14. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all money paid by you to Matthew Ammel in the form of income, commissions, appearance fees, salary, bonuses, balance sheets, dividends, or loans from 1 April 2022 to present.

RESPONSE:

15. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all gifts, tangible or intangible, purchased by you for Matthew Ammel, and all documents regarding or relating to such gifts, including but not limited to receipts, credit card statements, and canceled checks from 1 April 2022 to present.

RESPONSE:

16. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all gifts, tangible or intangible, given to you by Matthew Ammel, and all documents regarding or relating to such gifts, such as receipts from 1 April 2022 to present.

RESPONSE:

17. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any payment or expenditure made by you for the benefit of Matthew Ammel for the period 1 April 2022 to present, whether as a gift, loan, payment for services rendered or otherwise, including, but not limited to, the following:

- a) hotel accommodations;
- b) food;
- c) transportation;
- d) gasoline;
- e) clothing;
- f) personal items;
- g) communication device of any type (cell phone, track phone, calling card);
- h) gifts;
- i) personal bills or liabilities; and
- j) any other reason.

RESPONSE:

18. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any payment or expenditure made by Matthew Ammel for your benefit for the benefit for the period 1 April 2022 to present, whether as a gift, loan, payment for services rendered or otherwise, including, but not limited to, the following:

- (a) hotel accommodations;
- (b) food;
- (c) transportation;
- (d) gasoline;
- (e) clothing;
- (f) personal items;

- (g) communication device of any type (cell phone, track phone, calling card);
- (h) gifts;
- (i) personal bills or liabilities; and
- (j) any other reason.

RESPONSE:

19. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any documentation, including, but not limited to, all notes, photographs, souvenirs, memoranda, paper writings, or other tangible items relating to all overnight trips and overnight stays with Matthew Ammel from 1 April 2022 to present.

RESPONSE:

20. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all travel by you to North Carolina during the period 1 April 2022 to present, including but not limited to credit card statements, receipts, hotel reservation confirmations, rental contracts for accommodations or car rentals, airfare charges or airline tickets.

RESPONSE:

21. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all travel by you and Matthew Ammel to any state within the United States during the period 1 April 2022 to present, including but not limited to credit card statements, receipts, hotel

reservation confirmations, rental contracts for accommodations or car rentals, airfare charges or airline tickets.

RESPONSE:

22. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all international travel by you and Matthew Ammel during the period 1 April 2022 to present, including but not limited to credit card statements, receipts, hotel reservation confirmations, rental contracts for accommodations or car rentals, airfare charges or airline tickets.

RESPONSE:

23. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all photographs, audio and videotapes and other documents which show you and Matthew Ammel together.

RESPONSE:

24. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all photographs, audio and videotapes and other documents which show you and Matthew Ammel together or accompanied by a third person including Plaintiff and Matthew Ammel's minor children.

RESPONSE:

25. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all calendars or date books you have used from 1 April 2022 to present.

RESPONSE:

26. For all interests (including, but not limited to, fee simple or leasehold interests) in real property that you own or owned as of the date this action commenced, whether individually, as a tenant in common, joint tenant, or tenant by the entirety, or by any business entity in which you or Matthew Ammel own in excess of a five percent (5%) interest, please produce for Plaintiff's inspection and/or copying the following documents and records, evidencing your ownership interest, including, but not limited to, lease and deeds.

RESPONSE:

27. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all financial statements prepared by you or on your behalf, or on behalf of you and any third party from 1 April 2022 to present.

RESPONSE:

28. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all loan applications made by you personally or jointly with any other person or entity from 1 April 2022 to present.

RESPONSE:

29. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all bank statements for any account at any financial institution for which you have signature authority or any beneficial interest, whether the account is joint with another person, titled solely in your name, or a personal or business account for the period 1 April 2022 to present.

RESPONSE:

30. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any complete copies of your federal and state tax returns including all supporting schedules, along with associated tax forms for the corresponding years including but not limited to W-2, W-2p, K-1 and 1099 etc., and any amendments thereto, for the tax years 2022 to the present and in the event any return has not been prepared then provide copies of all W-2, W-2p, K-1, and 1099 forms for those years.

RESPONSE:

31. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any documents reflecting all salary, including employee bonuses, and all other income from any source received by you from 1 April 2022 to present.

RESPONSE:

32. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any

and all annual, monthly and/or quarterly statements of any stocks or securities owned solely or jointly by you, in which you have a legal or equitable interest, and/or which you have purchased or otherwise acquired by gift, devise, or any other method from 1 April 2022 to present.

RESPONSE:

33. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all monthly credit card statements, including itemized details of charges, for any and all credit card accounts in your name or on which you otherwise have signature authority or charging privileges, from the period 1 April 2022 to present.

RESPONSE:

34. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all trust instruments which reflect your interest as a grantor, beneficiary, trustee, or holder of power of appointment of any trust created by you, any member of your family, or any other person or third party, partnership, or corporation.

RESPONSE:

35. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all funds received by you from any source, including but not limited to loans, gifts, or direct payments made on your behalf.

RESPONSE:

36. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all leases (automobile, living accommodations or otherwise) to which you are a party and/or to which you were a party and/or copies of any leases executed by you, or bill of sale or purchase from 1 April 2022 to present.

RESPONSE:

37. Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all bills of sale or purchase for any auto bought, transferred to you or sold by you since 1 April 2022 to present, whether titled in your name or the name of a third party.

RESPONSE:

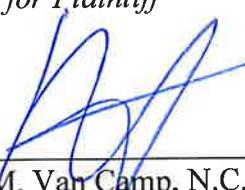
38. To the extent not previously produced, Please produce for Plaintiff's inspection and/or copying any and all documents in your custody, control, or possession which constitute, evidence, relate, or make reference to any and all documents evidencing any contact or communication between you and Matthew Ammel, including but not limited to, electronic mail correspondence or other computer generated communications, letters, notes, cards, phone records, audio or video tapes, photographs (printed or digital and stored on any computer or website), calendars, diaries, journals, travel documentation including plane or train tickets, reservation receipts, invoices, computer or website generated travel histories (such as maintained on websites such as Expedia or Travelocity), gas, restaurant, hotel or motel or other receipts, memorabilia, matchbooks or items with hotel, motel or restaurant information or logos, theatre, concert, or other entertainment venue tickets or ticket stubs, programs or souvenirs, credit card statements, cancelled checks or other indicia of monies expended evidencing your contact and/or

communication with Matthew Ammel. This request also includes gifts to and received from Matthew Ammel.

RESPONSE:

This, the 30 day of September 2025.

VAN CAMP, MEACHAM & NEWMAN, PLLC
Attorneys for Plaintiff

BY: 

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STATE OF NORTH CAROLINA
COUNTY OF MOORE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
FILE NO.: 25CV001930-620

HEATHER AMMEL,)
vs.)
Plaintiff,)
KYRSTEN SINEMA,)
Defendant.)

PLAINTIFF'S FIRST SET OF
INTERROGATORIES TO DEFENDANT

NOW COMES Plaintiff, Heather Ammel, by and through undersigned counsel, pursuant to Rules 26 and 33 of the North Carolina Rules of Civil Procedure and hereby propounds and serves the following written Interrogatories upon Defendant.

INSTRUCTIONS

You are required to answer these Interrogatories separately and fully in writing under oath within forty-five (45) days after service hereof, and to serve a copy of your answers on the undersigned counsel for Plaintiff within forty-five (45) days after date of service thereof.

These Interrogatories shall be continuing in nature until the date of trial, and you are required to serve supplemental answers as additional information may become available to you as required by Rule 26 of the North Carolina Rules of Civil Procedure.

If after a reasonable and thorough investigation and due diligence, you are unable to answer any interrogatory or any part thereof because of lack of information, please specify in complete detail why this information is not available to you, and what has been done to locate the information. In addition, specify what knowledge you do have concerning the unanswered portion of the interrogatory, and set forth the facts upon which such knowledge is based.

Where an interrogatory does not specifically request a specific fact, but where such fact or facts are necessary to make the answer to the interrogatory either comprehensible, complete, or not misleading, you are requested to include such fact or facts as part of the answer and the interrogatory shall be deemed specifically to request such fact or facts.

When an interrogatory asks for specific information, such as a date or an amount, and the specific information requested is not known to you, such Interrogatory shall be deemed to ask you to approximate the information as best you can, provided that you indicate in your response that the information being provided is an approximation or is incomplete in certain circumstances specific respects.

If you object, refuse to answer any request in whole or part, or if you claim any form or privilege whether based on a statute, or otherwise, as the ground for not answering an interrogatory, or any portion thereof, set forth in detail, each and every fact upon which a privilege or objection is based, and include such sufficient facts upon which the court may make a full determination where the claim or privilege is valid.

DEFINITIONS

The following words have the following meanings:

1. “Document” or “documents” includes, without limitation, and shall mean the embodiment, in any form, of any attempt, by any means, to utilize, memorialize, or communicate thoughts or information and it includes originals or drafts of any kind of written or graphic matter, however produced or reproduced, of any kind or description, whether sent or received or neither, including all outlines and proposals of any such documents (whether or not actually used), and all copies thereof which are different in any way from the original, to which you have or have had access or which may be in your possession, custody or control, or of which you have knowledge. As such, “document” includes, but is not limited to, any paper, contract, policy, endorsement, book, account, photograph, agreement, correspondence, memorandum, letter, telegram, facsimile, telecopy, e-mail, object, report, record, notes, intra-office communication, invoice, pamphlet, log, periodical, cable, study, diary, working paper, chart, graph, index, tape, data sheet or data processing care, floppy disk, disk, e-mail, printed circuit, check, time sheet, ledger, bill, computation, schedule, analysis, summary, instruction, computer memory bank, brief, pleading or other litigation paper, as well as any other tangible thing on which thoughts or information are recorded in writing, sound, pictures, punches, circuits, programs, or other written, recorded, transcribed, filmed, or other graphic matter however produced or reproduced.
2. The term “Plaintiff” shall mean Heather Ammel, and any attorney working on her behalf.

3. The terms “Defendant,” “you” or “your” shall mean Kyrsten Sinema, or any attorney, agents, employees, entity (corporation, partnership, limited liability company, etc.), partners, or any other person acting on your behalf.
4. “Matthew Ammel” means Plaintiff’s husband, Matthew Ammel.
5. The term “marriage,” “marital,” or “married” refers to the marriage between Plaintiff and Matthew Ammel.
6. The terms “children” or “minor children” refers to the children of Plaintiff and Matthew Ammel.
7. The term “person” or “persons” shall include any natural persons, firms, partnerships, associations, joint ventures, and corporations.
8. The term “entity” shall mean all legal and business organizations, including but not limited to sole proprietorships, corporations, general partnership, limited partnership, limited liability company, unions, association, and joint ventures.
9. The term “income” means gross incomes from all sources, including, but not limited to, wages, salaries, bonuses, commission, severance pay, deferred compensations, interest, dividends, distributions, annuities, capital gains, disability pay, gifts and prizes.
10. The term “date of separation” means 1 November 2024 and refers to the separation between Plaintiff and Matthew Ammel.
11. The terms “current date,” “present,” or “date of response” shall mean the last day of the month immediately preceding the month in which you serve your responses to these requests.
12. The term “net value” shall mean the fair market value reduced by any indebtedness for which the particular item or property is collateral or security.
13. The male gender includes the female gender, and the singular noun or pronoun includes the plural.
14. The term “communication” shall mean any oral or written utterance, notation, or statement of any nature whatsoever, by and to whomsoever made, including, but not limited to, correspondence, conversations, dialogues, discussion, interviews, consultations, agreements, and other understandings between or among two or more persons, by any means or mode of conveying information, including but not limited to telephone, facsimile, computer, or the like.

15. The term "identify" or "identity" as used with respect to a person means to state the person's full name and present address and his/her present or last known employment position and business affiliation if a natural person, and corporate or other status and address if not a natural person, "identify" or "identity" when used in reference to a document means to state the following as to each document:

- a. Its nature and contents;
- b. Its date;
- c. The date it was executed if difference from the date it bears;
- d. The name, address and position of its author or signer;
- e. The name, address and position of its addressee, if any;
- f. Its present location and the name, present address and position of the person or persons having present custody; and
- g. Whether it has been destroyed and, if so, with regard to such destruction:
 - i. the date of destruction;
 - ii. the reason for destruction; and
 - iii. the identity of the person who destroyed the document.

16. A request for the "location" of documents or other things constitutes a request to identify their custodian and to state the present address at which they are kept, if known, and, if not known, a statement that the present location is unknown, the last address known, and their disposition.

17. The term "relating to" shall mean consisting of, referring to, evidencing, reflecting, pertaining to, memorization, supporting or providing a basis for, or in any way logically or factually connecting to the matter discussed.

18. The term "custodian" means the person who has possession or control of documents or other things.

19. A request to "identify" a document constitutes a request to give a short title or description of the document sufficient to permit a custodian of that document to recognize the document being referenced.

20. A request for a "location" of a thing or of an occurrence constitutes a request to give enough information about that location so that a reasonable person would be able to find it.

21. A request to "identify" an occurrence, property, or a thing of any kind, whether tangible or intangible, constitutes a request to describe it with sufficient particularity so that a person with knowledge about it would recognize it from that description.
22. A request to "describe" an act, activity, or communication constitutes a request to state what the act consists of, to identify (as defined above) each individual who did each act, to state the date or dates when it occurred, to state the location or locations (as defined above) where it occurred, and to identify (as defined above) each person who was present when it occurred.
23. The term "or" appearing in an interrogatory should not be read so as to eliminate any party of the interrogatory, but, whenever applicable it should have the same meaning as the word "and."

INTERROGATORIES

1. Please state your full name, date of birth, address, and all telephone numbers where you can be reached and which you use, including employment telephone numbers.

RESPONSE:

2. Please identify any third party that has knowledge of the facts of this case, and for each, list the name, address, and telephone number for each third party and the relationship between you and the third party.

RESPONSE:

3. Identify all occasions by date and location that you have been in North Carolina from the period 1 April 2022 through the date of separation, stating for each such occasion any and all contact, whether in person, by telephone, text message, social media message, Signal message, or otherwise that you had with Matthew Ammel.

RESPONSE:

4. Identify all occasions by date on which you either made or received a telephone call or sent or received messages to/ from Matthew Ammel during the period 1 April 2022 to the date of separation, and for each occasion state your location when the call or message was sent/received and to the best of your knowledge Matthew Ammel's location when the call or message was sent/received.

RESPONSE:

5. Describe fully and completely each and every act of intimacy in which you have engaged with Matthew Ammel, said acts include, but not limited to kissing, physical embracing, fondling, sexual intercourse, and any other sexual act, from the date you first met Matthew Ammel to present, stating for each act identified:
 - (a) The date, time, and place where each act occurred;
 - (b) Who initiated the act;
 - (c) The identity of all third persons, if any, who witnessed the act.

RESPONSE:

6. Describe any and all video/audio recordings you have of you and Matthew Ammel together. For each video/audio recording please give the date it was made, what you contend the recording depicts, and who made the recording.

RESPONSE:

7. Describe fully and completely every business and social occasion, including home visits, vacations, and trips when you were in the presence of Matthew Ammel, alone, or accompanied by a third party or parties, from the date you first met Matthew Ammel to present, stating for each occasion:

- (a) The purpose of the occasion;
- (b) The date, time, and place;
- (c) The identity of each third person present.

RESPONSE:

8. Between 1 April 2022 to present, state all occasions on which Matthew Ammel visited any of your residences, including but not limited to your primary residence in Scottsdale, Arizona, and your apartment in Washington, D.C, stating with particularity:
 - (a) The date and place of each visit;
 - (b) The time of day or night of each visit;
 - (c) The reasons for the visit;
 - (d) The substance of all conversations with Matthew Ammel on each such occasion.

RESPONSE:

9. Between 1 April 2022 to present, state all occasions on which you visited any of Matthew Ammel's residences, stating with particularity:
 - (a) The date and place of each visit;
 - (b) The time of day or night of each visit;
 - (c) The reasons for the visit;
 - (d) The substance of all conversations with Matthew Ammel on each such occasion.

RESPONSE:

10. Did you tell any third person (other than your attorneys) you were having an affair with Matthew Ammel? If so, state the name, address, and telephone number of each person with

whom you confided, the date they were informed, and discuss the substance of the conversation.

RESPONSE:

11. Please state the circumstances under which you took any trips with Matthew Ammel from 1 April 2022 to the date of your response.

(a) State whether you had sexual intercourse with Matthew Ammel during the trip, and if so where and when.

RESPONSE:

12. State with specificity all bars, restaurants, hotels, concerts, or other locations where you have been with Matthew Ammel since 1 April 2022, including the date you were there, the names and addresses of all persons who accompanied you, and the particular occasion (i.e., dinner, drinks, business events, etc.).

RESPONSE:

13. Identify all gifts and/or loans you have gifted or loaned to Matthew Ammel from 1 April 2022 to present, stating as to each gift or loan identified the date it was given and the circumstances surrounding the transaction.

RESPONSE:

14. Identify all gifts and/or loans you have received from Matthew Ammel from 1 April 2022 to present, stating as to each gift or loan identified the date it was received and the circumstances surrounding the transaction.

RESPONSE:

15. Identify all expenses paid by you for Matthew Ammel from 1 April 2022 to present, including but not limited to medical bills, medical appointments, prescription medications, food, clothing, rent, and payments of any bills such as car payments, credit card payments, and/or utilities, stating the date such expenses were paid and the amount of each expense identified.

RESPONSE:

16. Please identify all health care providers and mental health care professionals including, but not limited to, all physicians, psychiatrists, psychologists, counselors, social workers, and therapists that you have paid for Matthew Ammel to see, consult with, or receive treatment from, and as to each, identify the name, address and telephone number of each professional, the specialty of each professional named, the period of time you paid for Matthew Ammel to be treated by each professional, the reason treatment was sought, any diagnosis made, the treatment provided, and medication prescribed to Matthew Ammel by each professional.

RESPONSE:

17. On what date did you first learn Matthew Ammel was married and from whom?

RESPONSE:

18. Identify all conversations between you and any third party (other than you attorneys) regarding Plaintiff and/or Plaintiff and Matthew Ammel, stating as to each conversation identified the substance of the conversation and the identity of the third party.

RESPONSE:

19. Identify all locations at which you have resided in the past five years, stating for each the dates of residency, all persons with whom you resided at the residence, and the person(s) in whose name the lease or title of the property is held.

RESPONSE:

20. If you contend genuine love and affection did not exist between Plaintiff and Matthew Ammel during the course of their marriage, identify the factual basis for your contention.

RESPONSE:

21. Identify all real property owned by you from the period 1 April 2022 to present, as a tenant in common, joint tenant, or as a tenant by the entirety, or by a business entity in which you own in excess of a five percent (5%) interest, including the names in which the property currently is titled, and the names and address of each person or entity other than you which has an ownership interest.

RESPONSE:

22. Identify all sources of income received by you either directly or indirectly, from 1 April 2022 to present, including the gross and net amounts of income received and the date of the receipt.

Income includes, but is not limited to, all benefits received as a beneficiary under any insurance policy, trust account, annuity policy, or will, and benefits received from any relative, personal acquaintance, and/or any other person or entity.

RESPONSE:

23. Please itemize all income benefits / money you receive including, but not limited to, income, rent commissions, salary, bonuses, paystubs, pay statements, balance sheets, draws, individual retirement plans, pensions, annuities, inheritances, social security benefits, military and/or veteran's benefits, lottery prizes, bank interest and/or dividends, loans you have received, gifts you have received, or any other things of value coming into your possession, showing the source, amount, and frequency of each payment from 1 April 2022 to present.

RESPONSE:

24. Identify all bank accounts and other monetary accounts in which you have had a legal or equitable interest at any time from 1 April 2022 to present, including savings accounts, checking accounts, or money funds, with any bank or institution.

RESPONSE:

25. Identify all internet service providers (e.g., AOL, Yahoo, GMAIL) with whom you have had an account from 1 April 2022 to present, and for each provider state your email address.

RESPONSE:

26. Identify all cellular carriers with whom you have had an account from 1 April 2022 to present, and for each provider state your telephone number and billing account number for the devices utilized.

RESPONSE:

27. Identify all social media accounts and messaging apps (e.g., Facebook, Instagram, X, TikTok, Signal, WhatsApp, GroupMe) with whom you have had an account from 1 April 2022 to present, and for each provider state your account name.

RESPONSE:

28. Identify all email addresses used by you at any time from 1 April 2022 to present, including but not limited to any work-related email. For any work-related email addresses, identify the corresponding employer.

RESPONSE:

29. Identify all persons having knowledge of any relevant information and/or discoverable matter pertaining to the claims in this action.

RESPONSE:

30. Please list and describe any known documents, exhibits, photographs, or pieces of physical evidence which pertain to the facts of this case.

RESPONSE:

31. Please describe with specificity your future plans with regard to where you intend to reside, including the address, with whom, a description of the residence, and future employment.

RESPONSE:

32. Describe in detail (time, date, substance of statement) any and all conversations you contend you have had with the minor children from 1 April 2022 to present.

RESPONSE:

33. Please describe in detail your involvement, if any, with extracurricular activities for the minor children since 1 April 2022 to present.

RESPONSE:

34. Specifically identify all civil and criminal actions with which you have been involved individually, as a witness, Defendant, complainant, or called law enforcement from 1 April 2022, to present. List the dates, infraction (including speeding infractions, traffic citations, and tickets), location, the substance of what was communicated/reported, and parties involved. Also detail the final disposition of each case.

RESPONSE:

35. Please describe any and all video/audio recordings you have of you and Matthew Ammel together. For each video/audio recording please give the date it was made, what you contend the recording depicts, and who made the recording.

RESPONSE:

This, the 30 day of September 2025.

VAN CAMP, MEACHAM & NEWMAN, PLLC
Attorneys for Plaintiff

BY: 

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