

EXHIBIT A

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

<p>JASON BOYCE,</p> <p>Plaintiff,</p> <p>-against-</p> <p>BRUCE WEBER; JASON KANNER; SOUL ARTIST MANAGEMENT; LITTLE BEAR INC.,</p> <p>Defendants.</p>

Index No.: 160630/2017

**PLAINTIFF’S RESPONSE TO
DEFENDANT BRUCE WEBER AND
LITTLE BEAR, INC.’S FIRST REQUEST
FOR THE PRODUCTION OF
DOCUMENTS**

Pursuant to Article 31 of the CPLR, Plaintiff JASON BOYCE (“Plaintiff”), by and through his attorneys, The Bloom Firm and Mark Risk, P.C., hereby object and respond to Defendants BRUCE WEBER (“Mr. Weber”) and LITTLE BEAR, INC.’s (“Little Bear”) First Request for the Production of Documents as follows:

GENERAL OBJECTIONS

1. Plaintiff’s specific objections to each Discovery Request are in addition the general objections set forth in this section. The absence of a reference to a general objection should not be construed as a waiver of the general objection as to any specific Discovery Request.
2. Plaintiff objects to the Discovery Requests to the extent that they purport to impose obligations beyond those required or permitted by the CPLR or the rules of this Court. Plaintiff will respond to the Discovery Requests in accordance with the requirements of the CPLR or the rules of this Court.
3. Plaintiff objects to the Discovery Requests to the extent that they are vague, ambiguous, overbroad, and/or unduly burdensome. To the extent that a Request is vague, ambiguous, overbroad, and/or unduly burdensome, Plaintiff will respond to the best of his ability.

DOCUMENT REQUEST NO. 2:

All documents relating to Plaintiff's potential or actual employment with any of the Defendants.

RESPONSE TO REQUEST NO. 2:

Plaintiff objects to this Request as overly broad, unduly burdensome, not limited in time or duration, and vague and ambiguous with respect to the phrase "relating to ... potential or actual employment." Plaintiff objects to this Request to the extent it would require Plaintiff to disclose information and/or documents that are protected by the right to confidentiality and/or privacy.

Subject to and without waiving the foregoing objections, Plaintiff will produce all non-privileged responsive documents in his possession after a reasonable search, including photographs of Plaintiff taken by Mr. Weber, and emails regarding Plaintiff's meeting with Mr. Weber.

Additional documents which are the subject of these Requests were at one time in existence, but were subsequently lost, discarded, or destroyed. Responsive documents are text messages between Plaintiff and Mr. Weber, and text messages between Plaintiff and Mr. Kanner, between approximately December 2014 and May 2015. The text messages were on Plaintiff's cell phone, iPhone model 5s, which Plaintiff used from approximately September 2013 until September 2016. Plaintiff deleted data from the iPhone in approximately September 2016 with the intention of trading in and/or selling the phone. The iPhone is currently in the possession of Plaintiff's counsel.

DOCUMENT REQUEST NO. 3:

All communications, including, but not limited to, any written, audio, video and/or recordings of communications, between Plaintiff and any person concerning the allegations in

the Complaint and/or this lawsuit, including, but not limited to, the media, and all documents relating the same.

RESPONSE TO REQUEST NO. 3:

Plaintiff objects to this Request as overly broad and unduly burdensome, as not every communication about the allegations in the Complaint and/or the lawsuit is material or necessary to this litigation, and the Request is not limited in time, duration, or scope. Plaintiff objects to this Request to the extent that it seeks information equally available to Mr. Weber and/or Little Bear, through a search for media articles about Mr. Weber and/or this lawsuit. Plaintiff objects to this Request to the extent it seeks information protected by attorney-client privilege, the attorney work product doctrine, the common interest doctrine, and the spousal privilege.

Subject to and without waiving the foregoing objections, Plaintiff will produce non-privileged responsive documents after a reasonable search. Documents that contain other people's allegations or opinions about the allegations and/or lawsuit will not be produced.

Video of Plaintiff's press conference regarding the lawsuit is available at:

<http://www.thebloomfirm.com/lisa-bloom-client-jason-boyce-hold-press-conference-regarding-lawsuit-famed-fashion-photographer-bruce-weber/> It is also contained on a DVD that will be

sent via mail.

DOCUMENT REQUEST NO. 4:

All documents relating to your engagement of counsel in connection with the allegations in the Complaint.

RESPONSE TO REQUEST NO. 4:

Plaintiff objects to the Request because it would require Plaintiff to disclose information neither relevant, material, or necessary to the litigation of this matter. Plaintiff objects to this

Request to the extent it calls for information protected by the attorney-client privilege, the attorney work product doctrine, and the common interest doctrine.

DOCUMENT REQUEST NO. 5:

All documents relating to monies received by you, or promised to you, from any source which relate to the incidents, conduct, injuries or claims alleged in the Complaint and/or the filing of this lawsuit

RESPONSE TO REQUEST NO. 5:

No responsive documents exist.

DOCUMENT REQUEST NO. 6:

All documents relating to the press conference that you participated in on December 5, 2017.

RESPONSE TO REQUEST NO. 6:

Plaintiff objects to this Request as vague and ambiguous as to the phrase, “relating to the press conference.” Plaintiff objects to this Request to the extent it calls for the production of information equally available to Mr. Weber and Little Bear. Plaintiff objects to this Request to the extent it calls for the production of information protected by attorney-client privilege, the attorney work product doctrine, and the common interest doctrine.

Subject to and without waiving the foregoing objections, Plaintiff will produce all non-privileged responsive documents in his possession after a reasonable search. Documents that are equally available to all parties, and/or that contain other people’s opinions about the press conference, such as Internet posts, will not be produced.

Plaintiff also respectfully refers Defendants to Response to Request No. 3, and to Lisa Bloom’s Twitter feed, publicly available at: <https://twitter.com/LisaBloom?lang=en>.

DOCUMENT REQUEST NO. 7: