

THESE INTERROGATORIES ARE PROPOUNDED IN ACCORDANCE WITH RULE 23 OF THE RULES OF THE SUPERIOR COURT OF THE STATE OF NEW HAMPSHIRE APPLICABLE IN CIVIL ACTIONS. YOU MUST ANSWER EACH QUESTION SEPARATELY AND FULLY IN WRITING AND UNDER OATH. YOU MUST RETURN THE ORIGINAL AND ONE COPY OF YOUR ANSWERS WITHIN THIRTY (30) DAYS OF THE DATE YOU RECEIVED THEM TO THE PARTY OR COUNSEL WHO SERVED THEM UPON YOU. IF YOU OBJECT TO ANY QUESTION, YOU MUST NOTE YOUR OBJECTION AND STATE THE REASON THEREFOR. IF YOU FAIL TO RETURN YOUR ANSWERS WITHIN THIRTY (30) DAYS, THE PARTY WHO SERVED THEM UPON YOU MAY INFORM THE COURT, AND THE COURT SHALL MAKE SUCH ORDERS AS JUSTICE REQUIRES, INCLUDING THE ENTRY OF A CONDITIONAL DEFAULT AGAINST YOU.

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Casella Waste Systems, Inc.

v.

Docket #217-2020-CV-212

Jon Swan et al.

**PLAINTIFF'S SECOND SET OF INTERROGATORIES PROPOUNDED UPON
DEFENDANT JON SWAN f/k/a JON ALVAREZ**

Plaintiff, Casella Waste Systems, Inc. ("Casella"), propounds the following interrogatories upon defendant Jon Swan f/k/a Jon Alvarez pursuant to N.H.Super. Court RuleCiv. 23.

DEFINITIONS

The following definitions apply to these interrogatories.

1. **"Communication"** shall mean the oral or written transmittal of information (in the form of facts, ideas, inquiries, or otherwise) and includes, but is not limited to, in-person or telephone conversations, voicemails, letters, memoranda, text messages or emails as well as the transfer of any **document** from one **person** to another.

2. **"Document"** shall mean any written or printed information, irrespective of the medium upon which it was recorded, including without limitation, writings, drawings, graphs, charts, photographs, recordings, notes, diaries, calendars, books, papers, journals, accounts,

invoices, social media accounts, and any computer-generated, computer-stored, or electronically stored information (“ESI”) within the meaning of Super. Ct. R. Civil 25 and includes preliminary versions, drafts, and revisions. It also includes the original and every non-identical copy (whether different from the original because of handwritten notes, underlining on the copy, or otherwise), regardless of origin or location. This definition includes but is not limited to ESI stored on a computer, smart phone, tablet, computer disk, hard drive, server, flash drive, memory card, or other storage media to which **you** have access, including in or on storage clouds, drop boxes, or websites and including any and all ESI contained on or otherwise posted on social media webpages, such as Facebook, Twitter, LinkedIn, Instagram, Pinterest, Google+, MySpace, etc.

3. “**Identify**” or “**identity**” shall mean (a) with respect to a **person**, to specify the name, residence address, residence telephone number, current occupation and position/title, occupation and position/title at the time of the actions or events in the interrogatory answer, business address, and business telephone number and (b) with respect to any other legal entity or association, including, without limitation, a corporation, LLC, limited or general partnership, to specify the name of that entity, its address, its telephone numbers, and the type of business.

4. “**Record**” shall mean any information that has been preserved in any fashion other than by human memory alone.

5. “**You**” or “**your**” shall mean Jon Swan, f/k/a Jon Alvarez, and his organization, Save Forest Lake.

Note: All defined terms appear in **bold print** in these interrogatories.

INSTRUCTIONS

Each interrogatory is to be answered in the space provided or on additional sheets of paper where necessary. Each answer shall be preceded by the interrogatory to which it responds.

For any interrogatory that seeks, in whole or in part, information or a **communication** which **you** believe to be privileged or subject to protection under the work-product doctrine, please respond to the interrogatory to the extent that it does not seek such information. With respect to information or a **communication** you believe to be so privileged or protected, please provide a privilege log pursuant to N.H. Super. Ct. R. Civil 21(c) contemporaneously with **your** responses, stating, for each such item of information or **communication**:

- a. its date;
- b. with whom the information originated;
- c. to whom the information has been disseminated;
- d. its general subject;
- e. if embodied in a **document** or **record**, **identify** its current custodian; and
- f. the claimed basis of privilege or protection.

These interrogatories shall be deemed to include a request for ongoing supplementation so that any additional information relating in any way to these interrogatories that becomes known to **you**, up to and including the time of trial, shall be supplied to plaintiff promptly in accordance with N.H. Super. Ct. R. Civil 21(g).

[Interrogatories begin on the next page.]

INTERROGATORIES

19. Please **identify** each social media website or application, if any, on which **you** maintain a personal account, an organizational account, or an interactive page or group that is not listed in **your** May 12, 2021 response to Casella's Interrogatory #3. Social media websites or applications include, but are not limited to, Facebook, LinkedIn, Twitter, Instagram, Foursquare, Tik Tok, Pinterest, WhatsApp, SnapChat, YouTube, Reddit, Tumblr, Skype, and similar platforms. For each account, please provide:

- a. The URL for the page, group, or account;
- b. The username or "handle" associated with **your** page, group, or account;
- c. The approximate date **you** joined the website or service; and
- d. A statement as to whether **your** page, group, or account is still active.

ANSWER:

News About Casella Waste Systems Operations In Connecticut

<https://www.facebook.com/profile.php?id=100090832525761>

Casella's Sneaky Sludge Invasion of Thurston, NY

<https://www.facebook.com/groups/738218261019950>

Keep NH Green <https://www.facebook.com/groups/582327260475593>

NH Solid Waste Working Group News & Info Page

<https://www.facebook.com/NHSWWG/>

Governor Sununu Is Unfit To Be President

<https://www.facebook.com/NoSununuIn2024/>

Citizens For Responsible Dalton Development

<https://www.facebook.com/DaltonDevelopmentAssociation/>

All Things Biosolids

<https://www.facebook.com/AllThingsBiosolids/>

Boycott Casella Waste Systems
<https://www.facebook.com/BoycottCasella>

Casella Waste Systems and Templeton, MA
<https://www.facebook.com/profile.php?id=100079530352946>

News/Info Page About NH State Senator Kevin "The Dark Elf" Avard
<https://www.facebook.com/profile.php?id=100086109605121>

News & Info About Casella's McKean County Landfill in PA
<https://www.facebook.com/profile.php?id=100079739806331>

Extended Producer Responsibility aka EPR In The News
<https://www.facebook.com/EPRinTheNews/>

Retire NH State Senator James "Dark Cloud" Gray In 2022
<https://www.facebook.com/profile.php?id=100085999087256>

Citizens To Re-Elect Jo Beth Dudley
<https://www.facebook.com/Vote4JoBeth/>

Dalton Citizens To Re-Elect Carol Sheltry
<https://www.facebook.com/profile.php?id=100067681537257>

Uncle Olaf Recipe Group
<https://www.facebook.com/groups/1337650536438267>

Friends of Mt. Washington <https://www.facebook.com/groups/1204846233707408>

Friends of Forest Lake Trails <https://www.facebook.com/groups/2858350697752674>

blah blah blah blah <https://www.facebook.com/groups/484264520126024>

Corrections to "Interrogatories" List

BeSMARTNH.com and StopNorthernTrash.com are no longer active websites

Casella Waste Systems And The Bodies Of Water They Have **Impacted**
<https://www.facebook.com/CasellaAndBodiesOfWaterImpacted/>

Concerns, Issues With Casella Hawk Ridge and Casella Organics In Unity ME
<https://www.facebook.com/CasellaOrganicsAndPFAS/>

Respectfully submitted,

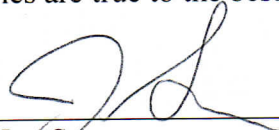
CASELLA WASTE SYSTEMS, INC.
By Its Attorneys,

Date: March 14, 2023

By: /s/ Morgan G. Tanafon
Bryan K. Gould, Esq. (NH Bar #8165)
gouldb@cwbp.com
Cooley A. Arroyo, Esq. (NH Bar #265810)
arroyoc@cwbp.com
Morgan G. Tanafon, Esq. (NH Bar #272632)
tanafonm@cwbp.com
Cleveland, Waters and Bass, P.A.
2 Capital Plaza, P.O. Box 1137
Concord, NH 03302-1137
(603) 224-7761

The foregoing answers to interrogatories are true to the best of my knowledge and belief.

Dated: *March 20, 2023*

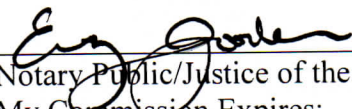


Jon Swan

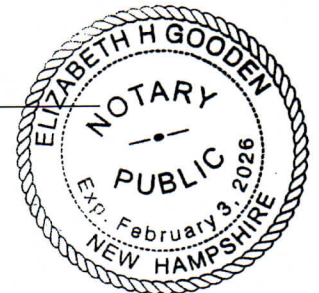
STATE OF NEW HAMPSHIRE
COUNTY OF *Grafton*, SS.

Personally appeared before me the above-named Jon Swan and swore or affirmed that the foregoing answers to interrogatories are true to the best of his knowledge and belief.

Dated: *3/20/23*



Notary Public/Justice of the Peace
My Commission Expires:



CERTIFICATE OF SERVICE

I hereby certify that the original and two copies of the within document were this day mailed, postage prepaid, Jeremy D. Eggleton, Esq., Orr & Reno, P.A., 45 S. Main Street, Ste. 400, P.O. Box 3550, Concord, NH 03302-3550.

Date: March 14, 2023

/s/ Morgan G. Tanafon
Morgan G. Tanafon, Esq.