

# **Exhibit 16**

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**  
**Civil Division**

**Estate of ROBERT E. WONE, by  
KATHERINE E. WONE,**

**Plaintiff,**

**v.**

**JOSEPH R. PRICE,**

**VICTOR ZABORSKY,**

**and**

**DYLAN WARD,**

**Defendants**

**Civil Action No. 0008315-08  
The Honorable Brook Hedge  
Next Event: Status Hearing  
September 10, 2010**

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**ANSWERS TO INTERROGATORIES**

**TO: Estate of Robert E. Wone, by Katherine E. Wone, as Personal Representatives,  
Plaintiff**

**FROM: Joseph R. Price, Defendant**

Joseph R. Price, Defendant, with the assistance of undersigned counsel, in answer to Plaintiff's Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and, thus, does not necessarily purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which required the disclosure of the facts which may be relevant or which may lead to the discovery of relevant information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

Answers

**INTERROGATORY NO. 1:** State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

**ANSWER:** Joseph R. Price, attorney. Defendant will provide the Plaintiff with his physical address and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

**INTERROGATORY NO. 2:** Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 3:** Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 4:** Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 5:** Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 6:** Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 p.m.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 7:** State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 8:** State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 9:** Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 10:** Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

**ANSWER:** Objection. This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, joint defense and spousal communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the production of information on a vast number of communications.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 11:** Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

(a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;

(b) whether and how you or any other person(s) physically or sexually assaulted Wone;

(c) whether and how you or any other person(s) stabbed Wone.

**ANSWER:** Objection. This Interrogatory, specifically subsections (a) and (b), seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was either injected with a foreign substance or sexually assaulted.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 12:** Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no

evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone's body was cleaned up, showered, bathed, or washed after he was stabbed.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 13:** Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swann Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make an assertion that to there was any effort to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition, or that any efforts were undertaken to move Wone's body, to wash clothing, bedding, or any other person, and/or to dispose of or discard a knife, clothing, or any other items.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 14:** Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, or otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is further objectionable in that it is overbroad and unduly burdensome in scope and time, in that it calls for detailed information on each and every communication between two brothers over a period of ten months. This Interrogatory lacks appropriate subject-matter limitations and temporal limitations.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 15:** Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 16:** State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 17:** State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.



**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. This Interrogatory is further objectionable in that it does not have reasonable temporal limitations.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 18:** State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

**ANSWER:** Objection. This Interrogatory, specifically subsections (a) and (b), seeks information that is irrelevant, not reasonably calculated to lead to the discovery of admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was injected with a foreign substance.

Without waiving and limited by said objection, upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 19:** Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

**ANSWER:** Upon advice of counsel, at this time Defendant exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 20:** Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.

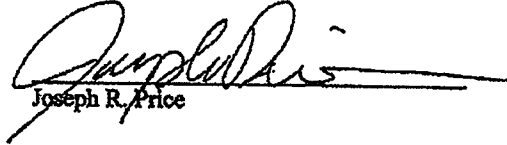
**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues in the litigation, and discovery of such items is improper at this stage of the litigation.

Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Price had in effect on August 2, 2006 a homeowners insurance policy with State Farm Fire and Casualty Company, a copy of which is produced in response to Plaintiff's Requests for Production of Documents.

**INTERROGATORY NO. 21:** Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues in the litigation, and discovery of such items is improper at this stage of the litigation.

I HEREBY CERTIFY UNDER THE PENALTIES OF PERJURY, THAT  
THE INFORMATION CONTAINED IN THE FOREGOING ANSWERS TO  
INTERROGATORIES IS TRUE AND CORRECT TO THE BEST OF MY KNOWLEDGE,  
INFORMATION AND BELIEF.

  
Joseph R. Price

DISTRICT OF COLUMBIA' 88

This document was acknowledged before me on August 19, 2010, by Joseph R. Price.

[Notary Seal, if any]:



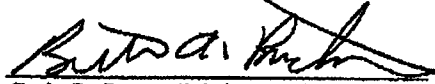
  
Notary Public

Notary Public for the District of Columbia

My commission expires: 10/31/2013

\_\_\_\_\_  
Melanie L. Radcliff  
Notary Public, District of Columbia  
My Commission Expires 10/31/2013

Respectfully submitted:



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**Attorneys for Defendant Joseph Price**

4851-2698-6503, v. 1

# **Exhibit 17**

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**Civil Division**

**Estate of ROBERT E. WONE, by  
KATHERINE E. WONE,**

**Plaintiff,**

**v.**

**JOSEPH R. PRICE,  
VICTOR ZABORSKY, and  
DYLAN WARD,**

**Defendants.**

**Civil Action No. 0008315-08**

**The Honorable Brook Hedge**

**Status Hearing: September 10, 2010**

**DEFENDANT, VICTOR ZABORSKY'S, ANSWERS**  
**TO PLAINTIFF'S INTERROGATORIES**

Victor Zaborsky, Defendant, with the assistance of undersigned counsel, in answer to Plaintiff's Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and, thus, does not necessarily purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which require the disclosure of the facts which may be relevant or which may lead to the discovery of relevant information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

### **PRELIMINARY OBJECTION**

The U.S. Attorney has openly stated its intent to continue pursuing its criminal investigation against this Defendant, which could result in additional criminal charges being filed against Defendant Zaborsky. In light of this fact, Defendant Zaborsky must exercise his right under the Fifth Amendment to the Constitution of the United States to decline to answer these Interrogatories, as any substantive answer to these Interrogatories may jeopardize his right to assert his Fifth Amendment rights in the future.

### **ANSWERS TO INTERROGATORIES**

**INTERROGATORY NO. 1:** State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

**ANSWER NO. 1:** Victor Zaborsky, Self-Employed Consultant. Defendant Zaborsky will provide the Plaintiff with his physical address and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

**INTERROGATORY NO. 2:** Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

**OBJECTION:** This Interrogatory seeks in part information that may be protected by the attorney client privilege, the work product doctrine, and/or the spousal privilege.

**ANSWER NO. 2:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 3:** Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

**ANSWER NO. 3:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 4:** Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

**ANSWER NO. 4:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 5:** Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

**ANSWER NO. 5:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.



**INTERROGATORY NO. 6:** Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 PM.

**ANSWER NO. 6:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 7:** State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

**ANSWER NO. 7:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 8:** State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

**ANSWER NO. 8:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 9:** Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

**ANSWER NO. 9:** Upon advice of counsel, at this time Defendant Zaborsky exercises

his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 10:** Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

**OBJECTION:** This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, and joint defense communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the production of information on a vast number of communications over a period of more than four years.

**ANSWER NO. 10:** Without waiving his objection, and upon advice of counsel Defendant Zaborsky at this time exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 11:** Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

- (a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;
- (b) whether and how you or any other person(s) physically or sexually assaulted Wone;
- (c) whether and how you or any other person(s) stabbed Wone.

**OBJECTION:** This Interrogatory, specifically subsections (a) and (b), seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant

or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was either injected with a foreign substance or sexually assaulted.

**ANSWER NO. 11:** Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 12:** Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

**OBJECTION:** This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone's body was cleaned up, showered, bathed, or washed after he was stabbed.

**ANSWER NO. 12:** Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 13:** Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

**OBJECTION:** This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make an assertion that to there was any effort to clean-up or re-arrange the 1509 Swan Street residence after Robert Wone was found in an injured condition, or that any efforts were undertaken to move Wone's body, to wash clothing, bedding, or any other person, and/or to dispose of or discard a knife, clothing, or any other items.

**ANSWER NO. 13:** Without waiving his objection, and upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 14:** Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

**ANSWER NO. 14:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 15:** Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

**ANSWER NO. 15:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 16:** State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

**ANSWER NO. 16:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 17:** State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.

**ANSWER NO. 17:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 18:** State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

**OBJECTION:** This Interrogatory seeks information that is neither relevant, nor reasonably calculated to lead to the discovery of relevant or admissible evidence, and is meant to serve no other purpose than to embarrass, humiliate, and disparage Defendant. Specifically, there is no evidentiary basis upon which Plaintiff can, in good faith and with substantial justification, make such an assertion that Robert Wone was injected with a foreign substance.

**ANSWER NO. 18:** Without waiving his objection, and upon advice of counsel, at this

time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

**INTERROGATORY NO. 19:** Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

**ANSWER NO. 19:** Upon advice of counsel, at this time Defendant Zaborsky exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this Interrogatory.

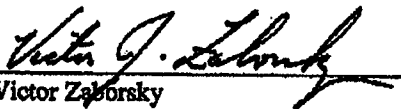
**INTERROGATORY NO. 20:** Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.

**ANSWER NO. 20:** This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have not bearing on the issues at litigation, and discovery of such items is improper at this stage of the litigation. Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Zaborsky states that he had in effect on August 2, 2006 a homeowners insurance policy with State Farm Fire and Casualty Company, a copy of which is being produced by Defendant Price in response to Plaintiff's Requests for Production of Documents.

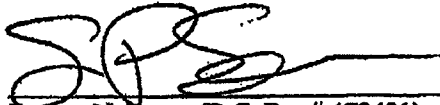
**INTERROGATORY NO. 21:** Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

**ANSWER NO. 21:** Objection. This Interrogatory seeks information that is irrelevant

I DO SOLEMNLY declare and affirm under the penalties of perjury that the contents of the foregoing Answers to Interrogatories are true and correct to the best of my knowledge, information, and belief.

  
Victor Zaborsky

Respectfully submitted,



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*Counsel for Defendant Victor Zaborsky*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on this 20<sup>th</sup> day of August, the following document was sent  
via First Class Mail, postage prepaid, and electronic transmission, to the following:

Benjamin J. Razi ([brazi@cov.com](mailto:brazi@cov.com))  
Stephen W. Rodger ([srodger@cov.com](mailto:srodger@cov.com))  
Daniel Suleiman ([dsuleiman@cov.com](mailto:dsuleiman@cov.com))  
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*Attorneys for Defendant, Dylan Ward*

A handwritten signature in black ink, appearing to be 'SP Edwards', written over a horizontal line.

Sean P. Edwards

# **Exhibit 18**

**SUPERIOR COURT OF THE DISTRICT OF COLUMBIA**

**Civil Division**

**Estate of ROBERT E. WONE, by  
KATHERINE E. WONE,**

**Plaintiff,**

**v.**

**JOSEPH R. PRICE,  
VICTOR ZABORSKY, and  
DYLAN WARD,**

**Defendants.**

**Civil Action No. 0008315-08**

**The Honorable Brook Hedge**

**Status Hearing: September 10, 2010**

**DEFENDANT DYLAN WARD'S ANSWERS TO  
PLAINTIFF'S FIRST SET OF INTERROGATORIES**

Defendant Dylan Ward, with the assistance of undersigned counsel, in answer to Plaintiff's First Set of Interrogatories states as follows:

A. The information supplied in these answers is not based solely on the knowledge of the executing party, but includes knowledge of the party, its agents, representatives and attorneys, unless privileged.

B. The word usage and sentence structure may be that of the attorney assisting in the preparation of these answers and does not purport to be the precise language of the executing party.

C. The information contained in these answers is being provided in accordance with the provisions and intent of District of Columbia Rules of Civil Procedure which require the disclosure of the facts which may be relevant or which may lead to the discovery of relevant

information. Accordingly, the party answering these interrogatories, by providing the information requested, does not waive objections to its admission in evidence on the grounds of materiality or relevancy or other proper grounds for objection.

D. These interrogatories have been interpreted and answered in accordance with the Rules of Civil Procedure and plain English usage. To the extent the definitions and instructions included with the interrogatories are inconsistent therewith, this party disavows any intention to abide by them.

#### **ANSWERS**

**INTERROGATORY NO. 1:** State your current name, occupation, place of employment, telephone number(s), e-mail address(es), and physical address(es).

**ANSWER:** Dylan M. Ward, unemployed. Defendant Ward will provide the Plaintiff with his physical address, e-mail address, and telephone number upon the entry of a protective order or execution of a confidentiality agreement protecting that information from third party disclosure.

**INTERROGATORY NO. 2:** Identify all persons who have knowledge of facts relevant to Plaintiff's claims or your defense(s) in this action and the nature, extent, and basis for their knowledge.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 3:** Identify all persons present at the 1509 Swann Street residence at any time on August 2, 2006. For each person present, state, in addition to personal identifying information, the time period during which they were in the residence on that day and their reason for being there.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 4:** Describe in detail the circumstances and events surrounding the murder of Robert Wone on the night of August 2, 2006, including but not limited to:

- (a) when Wone arrived at the 1509 Swann Street residence;
- (b) by what means of transportation he traveled to the 1509 Swann Street residence;
- (c) your interactions and discussions with Wone on the night of August 2, 2006;
- (d) how and when Wone was injured;
- (e) how and when you came to know that Wone was injured;
- (f) the specific location of Wone within the house, and the position of his body, when you first saw him in an injured condition; and
- (g) the actions you took upon finding Wone in an injured condition, including, without limitation, any steps that you took to assist him or summon help.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 5:** Describe in detail any and all bases for your contention that an "intruder" murdered Robert Wone.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 6:** Describe in detail your activities on the night of August 2, 2006, including, without limitation, when you first saw Robert Wone and what you were doing from the time that you first saw Wone on that night until the time that 9-1-1 was called at 11:49 p.m.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 7:** State whether you attempted to stanch Robert Wone's bleeding by using towel(s), cloth(s), or other item(s) to apply pressure to his wounds. If so, describe why no blood-soaked towel(s), cloth(s), or other item(s) were found by police at the 1509 Swann Street residence following the murder.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 8:** State whether, on August 2, 2006, you possessed or owned the cutlery set that is pictured at Tab J of the Affidavit of Detective Bryan Waid, which was filed in D.C. Superior Court on or about October 27, 2008. If you did possess or own said cutlery set on that date, state:

- (a) when and from whom you first obtained the cutlery set;
- (b) the number of items in the cutlery set when you first obtained it;
- (c) why the cutlery set was kept in your bedroom;
- (d) whether the cutlery set or any part of it was used on August 2, 2006 for any purpose, including, without limitation, to stab Robert Wone;
- (e) the whereabouts of the smaller knife in the cutlery set on August 2, 2006;
- (f) the whereabouts of the smaller knife in the cutlery set on August 3, 2006; and
- (g) the whereabouts of the smaller knife in the cutlery set today.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 9:** State whether you made any telephone calls between the time on August 2, 2006 when you first discovered Robert Wone in an injured condition or learned that Wone was injured and the time that EMS technicians arrived at the 1509 Swann Street residence. If so, identify each and every person with whom you spoke by telephone during this period and describe the sum and substance of the conversation(s).

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 10:** Identify by telephone number, service provider, and account number any cellular telephones, blackberries, pagers, or other electronic communication devices used by you on or about August 2, 2006.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 11:** Identify each and every person with whom you have discussed Robert Wone's murder or any of the events or activities involving Wone that occurred on August 2, 2006. For each person identified, state the approximate date of your discussion and describe the sum and substance of the conversation.

**ANSWER:** Objection. This Interrogatory, at least in part, seeks identification of privileged attorney work product, communications made in anticipation of litigation, and communications protected by the attorney-client, and joint defense communication privileges. This Interrogatory is additionally over broad and unduly burdensome in purporting to call for the

production of information on a vast number of communications over a period of more than four years. Without waiving and limited by said objection, upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 12:** Describe in detail all physical contacts you or any other person(s) had with Robert Wone's body, either directly or indirectly, on the night of August 2, 2006, including, without limitation:

- (a) whether and how you or any other person(s) injected any drugs, medications, or foreign substance into, or in any way caused the introduction of drugs, medications, or foreign substances into Wone's body;
- (b) whether and how you or any other person(s) physically or sexually assaulted Wone;
- (c) whether and how you or any other person(s) stabbed Wone.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 13:** Describe in detail any actions taken by you or any other individual(s) to clean-up, shower, bathe, or wash Robert Wone's body after he was found in an injured condition on the night of August 2, 2006.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 14:** Describe in detail any actions taken by you or any other individual(s) to clean-up or re-arrange the 1509 Swann Street residence after Robert Wone was found in an injured condition on the night of August 2, 2006, including, without limitation, any



efforts to move Wone's body; to wash clothing, bedding, your body or anyone else's body or other items; and/or to dispose of or discard a knife, clothing, or any other items.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 15:** Describe in detail any and all communications, whether in person, by telephone, electronic mail, text message, or otherwise, between you and Michael Price at any time from March 2006 through December 2006. For each such communication, provide at least the date of the communication, the identity of all persons party to the communication, and the sum and substance of the communication.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 16:** Identify the vendor or service provider responsible for the automated alarm system available for use at the 1509 Swann Street residence on the night of August 2, 2006.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 17:** State whether, from the time that you moved into the 1509 Swann Street residence until August 2, 2006, an intruder, burglar, or other unauthorized person had ever entered the residence. If so, identify the intruder(s), burglar(s), or unauthorized entrant(s) and describe the circumstances surrounding each such incident.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 18:** State whether you consumed alcohol, illegal drugs, prescriptions medications (whether you had a valid prescription or not), within 48 hours before or after Robert Wone's murder the night of August 2, 2006. If so, identify the name of the substance consumed, the amount consumed, and your reason for consuming it.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 19:** State whether you have ever injected any medication, drugs, or foreign substances into another person. If so, for each such instance, state the name of the person whom you injected, the name of the medication, drug, or substance that was injected, and the reason for doing so.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

**INTERROGATORY NO. 20:** Describe in detail your relationship with Robert Wone, including, without limitation, when you first met Wone and the nature of the relationship, if any, between the two of you.

**ANSWER:** Upon advice of counsel, at this time Defendant Ward exercises his right under the Fifth Amendment to the Constitution of the United States to decline to answer this interrogatory.

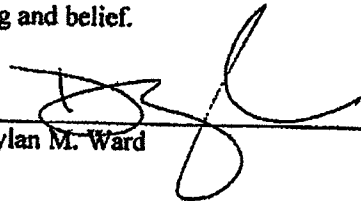
**INTERROGATORY NO. 21:** Describe and identify all of your assets or liabilities valued in excess of \$5,000, including, without limitation, real property, personal property, securities, mutual funds, cash, and/or insurance policies.

**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues raised by Plaintiff's Complaint and discovery of such items is improper at this stage of the litigation. Without waiving and limited by said objection, and to the limited extent that this Interrogatory requests information regarding insurance policies, Defendant Ward has no such policy.

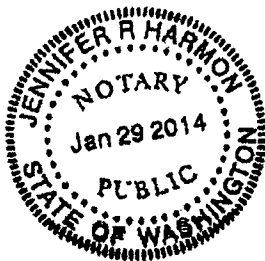
**INTERROGATORY NO. 22:** Describe in detail any sales, gifts, or transfers of assets valued in excess of \$5,000 made by you to any other person or entity since August 2, 2006. For each such transaction, identify the asset, the buyer, recipient, or transferee, the consideration provided, and the reason you entered into the transaction.

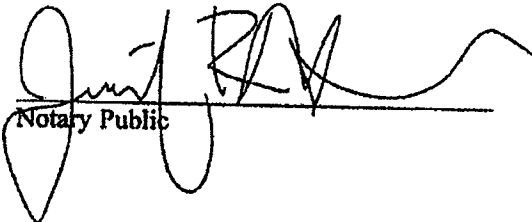
**ANSWER:** Objection. This Interrogatory seeks information that is irrelevant and/or not reasonably calculated to lead to the discovery of admissible evidence. Specifically, Defendant's assets and liabilities have no bearing on the issues raised by Plaintiff's Complaint and discovery of such items is improper at this stage of the litigation.

I hereby swear and affirm under the penalty of perjury that the above answers are true and correct to the best of my knowledge, understanding and belief.

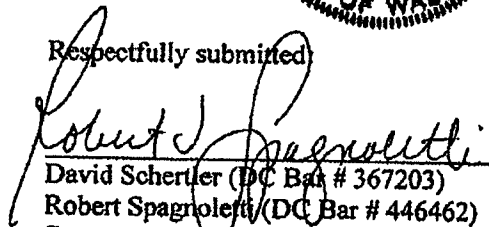
  
Dylan M. Ward

Sworn and subscribed before me on this 18 day of August, 2010.



  
Notary Public

Respectfully submitted



David Schertler (DC Bar # 367203)

Robert Spagnoletti (DC Bar # 446462)

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