

EXHIBIT 4

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO**

Civil Action No. 17-cv-00210-RBJ

LIST INTERACTIVE, LTD. D/B/A UKNIGHT INTERACTIVE,
LEONARD S. LABRIOLA,

Plaintiffs,

v.

KNIGHTS OF COLUMBUS,
THOMAS P. SMITH, JR.,
MATTHEW A. ST. JOHN,

Defendants.

**DEFENDANT KNIGHTS OF COLUMBUS' ANSWERS AND OBJECTIONS TO
PLAINTIFFS' FIRST SET OF REQUESTS FOR ADMISSION**

Defendant Knights of Columbus (the "Order"), by its attorneys, Lewis Roca Rothgerber Christie LLP, hereby answers and objects to Plaintiffs' First Set of Requests for Admission dated February 27, 2017, as follows:

REQUEST FOR ADMISSION NO. 1: Admit that a contract exists between the Knights of Columbus and UKnight where part of the performance requirement of the Knights of Columbus was to announce UKnight as its designated vendor.

ANSWER: Deny. No contract exists between the Order and UKnight.

REQUEST FOR ADMISSION NO. 2: Admit that You made the promises stated in Paragraph 112 of the Amended Complaint.

ANSWER: Deny. The Order made no such promises.

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REQUEST FOR ADMISSION NO. 3: Admit that digital platform architecture, design and coding as alleged in more detail in Paragraph 117 of the Amended Complaint constitute trade secrets owned by UKnight within the meaning of C.R.S. § 7-74-102.

ANSWER: Deny. The Order is unaware of any trade secrets owned by UKnight within the meaning of C.R.S. § 7-74-102(4).

REQUEST FOR ADMISSION NO. 4: Admit that state-level officers (State Deputies, State Advocates, District Deputies, etc.) are not employees of Yours and are not represented by Your counsel in this matter.

ANSWER: Admit.

REQUEST FOR ADMISSION NO. 5: Admit that You are a RICO person within the meaning of 18 U.S.C. § 1961(3).

ANSWER: Admit only that the Order is an entity capable of holding a legal or beneficial interest in property. Deny that RICO has any application to this case, to the Order, or to any activities of the Order.

REQUEST FOR ADMISSION NO. 6: Admit that You are associated with and are involved in the management and operations of the Knights of Columbus Order as a whole.

OBJECTION: Objection; the Order does not know what Plaintiffs mean by “the Knights of Columbus Order as a whole” as used in Request for Admission No. 6. Without waiving this objection, the Order admits that it is associated with and involved in its own management and operations.

REQUEST FOR ADMISSION NO. 7: Admit that You are distinct from the Knights of Columbus Order as a whole.

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Paragraphs 86, 88, 112, and 140, and denies all other assertions of Request for Admission No. 15.

DATED this 29th day of March, 2017.

s/Edward A. Gleason

EDWARD A. GLEASON
LEWIS ROCA ROTHGERBER CHRISTIE LLP
90 South Cascade Avenue, Suite 1100
Colorado Springs, CO 80903
Telephone: 719.386.3000
Facsimile: 719-386-3070
Email: egleason@lrrc.com

Attorneys for Defendant Knights of Columbus

CERTIFICATE OF SERVICE

I hereby certify that on this 29th day of March, 2017, a copy of the foregoing *Defendant Knights of Columbus' Answers and Objections to Plaintiffs' First Set of Requests for Admission* was emailed to the following:

Jeffrey S. Vail
Vail Law LLC
5299 DTC Blvd., Suite 1101
Greenwood Village, CO 80111
jvail@vail-law.com

s/Edward A. Gleason