

Exhibit A

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 17 MARK A. JANSSON, and PROTECTMARRIAGE.COM – YES ON 8, A
 PROJECT OF CALIFORNIA RENEWAL

18 * Admitted *pro hac vice*

19 **UNITED STATES DISTRICT COURT**
 20 **NORTHERN DISTRICT OF CALIFORNIA**

21 KRISTIN M. PERRY, SANDRA B. STIER, PAUL
 22 T. KATAMI, and JEFFREY J. ZARRILLO,

23 Plaintiffs,

24 CITY AND COUNTY OF SAN FRANCISCO,

25 Plaintiff-Intervenor,

26 v.

27 ARNOLD SCHWARZENEGGER, in his official
 28 capacity as Governor of California; EDMUND G.

CASE NO. 09-CV-2292 VRW

**DEFENDANT-INTERVENORS’
 AMENDED RESPONSE TO
 PLAINTIFFS’ FIRST SET OF
 INTERROGATORIES**

1 BROWN, JR., in his official capacity as Attorney
2 General of California; MARK B. HORTON, in his
3 official capacity as Director of the California
4 Department of Public Health and State Registrar of
5 Vital Statistics; LINETTE SCOTT, in her official
6 capacity as Deputy Director of Health Information
7 & Strategic Planning for the California Department
8 of Public Health; PATRICK O'CONNELL, in his
9 official capacity as Clerk-Recorder for the County
10 of Alameda; and DEAN C. LOGAN, in his official
11 capacity as Registrar-Recorder/County Clerk for
12 the County of Los Angeles,

13
14 Defendants,

15 and

16 PROPOSITION 8 OFFICIAL PROPONENTS
17 DENNIS HOLLINGSWORTH, GAIL J.
18 KNIGHT, MARTIN F. GUTIERREZ, HAK-
19 SHING WILLIAM TAM, and MARK A.
20 JANSSON; and PROTECTMARRIAGE.COM –
21 YES ON 8, A PROJECT OF CALIFORNIA
22 RENEWAL,

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24 Defendant-Intervenors.
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Additional Counsel for Defendant-Intervenors

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40 * Admitted *pro hac vice*

1 Defendant-Intervenors (the “Proponents”), pursuant to Rules 26 and 33 of the Federal
2 Rules of Civil Procedure, amend their responses to Plaintiffs’ First Set of Interrogatories as
3 follows. Proponents generally reserve the right to further supplement and/or amend these
4 responses to the extent required and/or allowed by the Federal Rules of Civil Procedure. In
5 particular Proponents reserve the right to supplement and/or amend these responses as
6 necessitated by ongoing legal and factual development, discovery and/or judicial rulings in this
7 case.

8 **RESPONSES**

9 **INTERROGATORY NO. 1:**

10 Identify every legitimate government interest to which you contend Proposition 8 is
11 rationally related.

12 **RESPONSE:**

- 13 1. Preserving the traditional institution of marriage as the union of a man and a woman.
- 14 2. Preserving the traditional public, social, and legal meaning, symbolism, and valuation of
15 marriage.
- 16 3. Preserving the traditional social and legal purposes, functions, and structure of marriage.
- 17 4. Preserving the traditional meaning of marriage as it has always been defined in the English
18 language.
- 19 5. Expressing support for the traditional institution of marriage.
- 20 6. Acting incrementally and with caution when considering a radical transformation to the
21 fundamental nature of a bedrock social institution.
- 22 7. Decreasing the probability of weakening of the institution of marriage.
- 23 8. Decreasing the probability of adverse consequences that could result from weakening the
24 institution of marriage.
- 25 9. Promoting the formation of naturally procreative unions.
- 26 10. Promoting stability and responsibility in naturally procreative relationships.
- 27 11. Promoting enduring and stable family structures for the responsible raising and care of
28 children by their biological parents.

- 1 12. Increasing the probability that natural procreation will occur within stable, enduring, and
2 supporting family structures.
- 3 13. Promoting the natural and mutually beneficial bond between parents and their biological
4 children.
- 5 14. Increasing the probability that each child will be raised by both of his or her biological
6 parents.
- 7 15. Increasing the probability that each child will be raised by both a father and a mother.
- 8 16. Increasing the probability that each child will have a legally recognized father and mother.
- 9 17. Promoting relationships between women and men for practical and symbolic purposes.
- 10 18. Providing men with a stake in families and society.
- 11 19. Decreasing the probability of the potential consequences of same-sex marriage identified
12 in paragraphs 69 through 70 of David Blankenhorn's expert report.
- 13 20. Decreasing the probability of the potential consequences of same-sex marriage identified
14 in paragraphs 52-54 and paragraphs 57-61 of Katherine Young's expert report.
- 15 21. Preserving the prerogative and responsibility of parents to provide for the ethical and
16 moral development and education of their own children.
- 17 22. Accommodating the First Amendment rights of individuals and institutions that oppose
18 same-sex marriage on religious or moral grounds.
- 19 23. Using different names for different things.
- 20 24. Maintaining the flexibility to separately address the needs of different types of
21 relationships.
- 22 25. Ensuring that California marriages are recognized in other jurisdictions.
- 23 26. Conforming California's definition of marriage to federal law.
- 24 27. Any other conceivable legitimate interests identified by the parties, amici, or the judge at
25 any stage of the proceedings.

26 **INTERROGATORY NO. 2:**

27 Identify every important government interest to which you contend Proposition 8 is
28 substantially related.

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RESPONSE:

Interests 1-24 identified above.

INTERROGATORY NO. 3:

Identify every compelling government interest that you contend Proposition 8 is narrowly tailored to serve.

RESPONSE:

Interests 1-24 identified above.

1 Dated: November 30, 2009

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3 Ron Prentice
Ron Prentice for Defendant-Intervenors

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5 COOPER AND KIRK, PLLC
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10 YES ON 8, A PROJECT OF CALIFORNIA RENEWAL.

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By: /s/Charles J. Cooper
Charles J. Cooper