

UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF WISCONSIN

FREEDOM FROM RELIGION )  
FOUNDATION, INC., ANNE NICOL )  
GAYLOR, ANNIE LAURIE GAYLOR, )  
PAUL GAYLOR, DAN BARKER, )  
PHYLLIS ROSE, and JILL DEAN, )

Plaintiffs, )

v. )

PRESIDENT BARACK OBAMA, )  
WHITE HOUSE PRESS SECRETARY )  
ROBERT GIBBS, WISCONSIN )  
GOVERNOR JIM DOYLE, and SHIRLEY )  
DOBSON, CHAIRMAN OF THE )  
NATIONAL DAY OF PRAYER TASK )  
FORCE, )

Defendants. )

Case No. 08-CV-588

**DEFENDANT SHIRLEY DOBSON’S ANSWER**

Defendant Shirley Dobson answers the First Amended Complaint as follows:

1. Paragraph 1 summarizes Plaintiffs’ allegations and prayer for relief and thus no response is needed. Otherwise, denied.

2. Admit.

3. Admit.

4. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

5. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

6. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

7. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

8. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

9. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

10. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

11. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

12. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

13. Admit.

14. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

15. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

16. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

17. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

18. This paragraph is a summary of the relief Plaintiffs are seeking, and thus no response is necessary. Otherwise, denied.

19. Defendant admits that she is the Chairman of the National Day of Prayer Task Force (“Task Force”). Otherwise, denied.

20. This paragraph is a legal conclusion to which no response is necessary.

21. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

22. Denied.

23. Denied.

24. Denied.

25. Denied.

26. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

27. Denied.

28. This paragraph is a summary of a document, which speaks for itself, and no response is necessary. Otherwise, denied.

29. This paragraph is a summary of a document, which speaks for itself, and no response is necessary.

30. Denied.

31. Denied.

32. Denied.

33. Denied.

34. Denied.

35. Denied.

36. Denied.

37. Denied.

38. Denied.

39. Denied.

40. Denied.

41. Denied.

42. Defendant admits that the Task Force rents space from Focus on the Family.

Otherwise, denied.

43. Denied.

44. Denied.

45. Denied.

46. Denied.

47. Denied.

48. Denied.

49. Denied.

50. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

51. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

52. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

53. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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57. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

58. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

59. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

60. Denied.

61. Denied.

62. Denied.

63. Denied.

64. Denied.

65. This paragraph is a summary of a document, which speaks for itself, and no response is necessary.

66. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

67. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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79. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

80. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

81. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

82. Denied.

83. Denied.

84. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

85. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

86. Denied.

87. Denied.

88. Denied.

89. Denied.

90. Denied.

91. Denied.

92. Denied.

93. Denied.

94. Denied.

95. Denied.

96. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

97. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

98. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

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101. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

102. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

103. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

104. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

105. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

106. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

107. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

108. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

109. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

110. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

111. No response is necessary to the legal conclusions contained in this paragraph. Otherwise, denied.

112. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

113. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

114. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

115. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

116. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

117. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

118. Denied.

119. Denied.

120. Denied.

121. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

122. Denied.

123. Denied.

124. Denied.

125. Denied.

126. Denied.

127. Denied.

128. Denied.

129. Defendant lacks sufficient knowledge or information necessary to admit or deny the allegations in this paragraph, and thus denies them.

130. Denied.

131. Denied.

132. Denied.

133. Denied.

#### **AFFIRMATIVE DEFENSES**

1. Plaintiffs have failed to state a claim for which relief can be granted.

2. Plaintiffs have failed to present a case or controversy.

3. Plaintiffs lack standing.

4. The relief Plaintiffs seek would unconstitutionally interfere with Defendant Dobson's First Amendment rights.

5. The relief Plaintiffs seek would violate the Establishment Clause.

6. The relief Plaintiffs seek would violate Defendant Dobson's Due Process and Equal Protection rights.

7. The relief Plaintiffs seek would violate the separation of powers doctrine.

Dated: June 9, 2009

Respectfully submitted,

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COUNSEL FOR DEFENDANT SHIRLEY DOBSON

### **CERTIFICATE OF SERVICE**

I hereby certify that on June 9, 2009, I electronically filed a copy of the above using the ECF System for the Western District of Wisconsin, which will send notification of that filing to all counsel in this litigation who have entered an appearance, including counsel for plaintiffs.

/s/Joel Oster  
Joel Oster