

**Senator Charles Grassley**  
**Second Set of Supplemental Questions for the Record**

**Stephen R. Bough**  
**Nominee, United States District Judge for the**  
**Western District of Missouri**

Please respond to the following Second Set of Supplemental Questions for the Record, which addresses answers you provided to Senator Grassley's Supplement Questions for the Record on November 10, 2014.

- 1. In response to Supplemental Question for the Record No. 3, you stated that you are unable "to provide additional documentation due to the attorney-client privilege." The question specifically anticipated that some responsive documents could be, in part, subject to the privilege and asked you to provide redacted versions of all responsive documents. Accordingly, I repeat my initial request that you provide all documentation – including but not limited to billing records, email communications, and legal memoranda – supporting your response to Supplemental Question No. 3, redacted appropriately to protect any privileged material.**

Response: In that I was working on this case on a contingent fee agreement I did not bill or document any hours, but I estimate I worked several dozen hours on this case. The plaintiffs' responses to defendants' motions for summary judgment are the only substantive legal memoranda that arose during my involvement in the case. While I provided advice and edits regarding these three pleadings, that advice and drafts of these memoranda are protected by the attorney-client privilege. I have, however, attached the final version of these pleadings which were filed with the Court.

- 2. Please describe with specificity any court proceedings related to the *Champion* matter that you attend either telephonically or in person, including, but not limited to, depositions, status hearings, motions hearing, and settlement negotiations. Please include with your response the date on which the proceeding occurred.**

Response: My role in the *Champion* case was to serve as co-trial counsel and to advise on strategy and federal procedure. As such, I did not personally appear at the depositions. Only one hearing occurred during the time I was counsel in the *Champion* case and it was a telephone scheduling conference call on May 21, 2013. I did not participate in this conference call because I had previously committed to attending the St. Paul's Episcopal Day School Trustee's meeting at the same time, but I did provide my co-trial counsel with my trial conflict dates.

3. **Please provide the caption and case number of all matters that were assigned, or are currently assigned, to Senior Judge Wright in which you noticed an appearance since January 1, 2006.**

Response: In the case of *Newton v. State Farm Fire & Casualty Co.*, 4:14- cv-00158-DGK, I filed the case and it was removed to federal court on February 14, 2014. The case was reassigned from Magistrate Judge Larsen to Senior Judge Wright on February 20, 2014. On that same day Senior Judge Wright recused himself.