

<p>DISTRICT COURT FOR THE CITY AND COUNTY OF DENVER, COLORADO</p> <p>Address of Court: 1437 Bannock Street Denver, CO 80202</p>	<p>DATE FILED: October 11, 2021 12:52 PM FILING ID: A59AB061BB54B CASE NUMBER: 2020CV34319</p>
<p>Plaintiff: ERIC COOMER, Ph.D.</p> <p>v.</p> <p>Defendants: DONALD J. TRUMP FOR PRESIDENT, INC., <i>et al.</i></p>	<p>▲ COURT USE ONLY ▲</p>
<p>Attorneys for defendants Herring Networks, Inc., d/b/a One America News Network, and Chanel Rion: Richard A. Westfall, No. 15295 Westfall Law, LLC 5842 W. Marquette Drive Denver, Colorado 80235 Telephone: (720) 904-6022 Email: rwestfall@westfall.law</p> <p>Blaine C. Kimrey (<i>Pro Hac Vice</i>) Jeanah Park (<i>Pro Hac Vice</i>) Bryan K. Clark (<i>Pro Hac Vice</i>) Julia L. Koechley (<i>Pro Hac Vice</i>) Vedder Price P.C. 222 N. LaSalle Street, Suite 2600 Chicago, Illinois 60601 Telephone: (312) 609-7500 Facsimile: (312) 609-5005 Email: bkimrey@vedderprice.com jpark@vedderprice.com bclark@vedderprice.com jkoechley@vedderprice.com</p>	<p>Case Number: 2020CV034319</p> <p>Courtroom: 409</p>
<p>EXHIBIT B</p>	

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<p>DECLARATION OF CHRISTY ORZULAK</p>	

I, Christy Orzulak, declare and state as follows:

1. My name is Christy Orzulak. I am over 21 years of age, am of sound mind, and am fully competent to make this Declaration. I have personal knowledge of the facts stated in this Declaration, which are true and correct.

2. I have served as a paralegal since January 2012. Presently, I am a contract paralegal for Front Range Paralegal, LLC (“Front Range”). I have held this position since September 2020. Previously, I served as a paralegal for Hale Westfall, LLP between May 2018 and August 2020. Prior to my employment at Hale Westfall, LLP, I served as a paralegal at Sweet, Stevens, Katz & Williams, LLP between January 2012 and May 2018.

3. The law firm of Richard Westfall, LLC has contracted with Front Range so that I can serve as Mr. Westfall’s paralegal.

4. Mr. Westfall and I are new to this case. We were not retained until September 22, 2021. Since beginning our representation, we have had to work to acquaint ourselves with a voluminous docket while dealing with a large number of new filings within a short period of time.

5. As the paralegal to Mr. Westfall, I have been solely responsible for initiating the filings submitted by Mr. Westfall and Vedder Price on behalf of defendants Herring Networks, Inc., d/b/a One America News Network, and Chanel Rion (collectively, the “OAN Defendants”).

6. On October 7, 2021, the Honorable Judge Moses entered an Order in this case, denying Vedder Price associate Julia Koechley’s updated unopposed *pro hac vice* admission motion (even though Ms. Koechley had already been admitted and the updated motion was filed per direction by the Court because Vedder Price had lost full docket access after Lathrop GPM withdrew as counsel for the OAN Defendants in this case). In this Order, Judge Moses noted her

concerns about suppressed filings by the OAN Defendants, and she noted that Ms. Koechley's updated *pro hac vice* application should not have been filed as suppressed.

7. After reviewing the situation with Vedder Price and Mr. Westfall, it became apparent that I had made a mistake in making some filings as "suppressed." While there were a number of filings made over a period of a few days that were properly filed as "suppressed," the following documents were filed as "suppressed" that should not have been so designated: (i) Motion to Set Aside the Omnibus Protective Order entered pursuant to C.R.C.P. 26(c) and to Unseal Court Records Designated as Protected or Suppressed; (ii) Reply in Support of Their Motion for Partial Reconsideration of the Court's September 22, 2021 Order; (iii) Joinder to Defendants Joseph Oltmann, FEC United, Inc. and Shuffling Madness Media Inc. d/b/a Conservative Daily's Response in Opposition to Plaintiffs Second Motion for Sanctions Pursuant to CRCP 37; (iv) Out-of-State Counsel's Updated Unopposed Verified Motion Requesting *Pro Hac Vice* Admission (B. Kimrey); (v) Out-of-State Counsel's Updated Unopposed Verified Motion Requesting *Pro Hac Vice* Admission (J. Park); (vi) Out-of-State Counsel's Updated Unopposed Verified Motion Requesting *Pro Hac Vice* Admission (B. Clark); and (vii) Out-of-State Counsel's Updated Unopposed Verified Motion Requesting *Pro Hac Vice* Admission (J. Koechley).

8. At 4:17 p.m. MT on October 7, 2021 (i.e., shortly after the Court entered the October 7, 2021 Order), I contacted the Court's clerk and advised that I had made the clerical error of filing certain documents as "suppressed" and that there was no malicious intent behind this error. I also asked that the Court be apprised of my innocent mistake and apologized for the inconvenience. The Court's clerk advised that she would advise the Court of my call.

9. After consulting with Mr. Westfall and Vedder Price, I promptly re-filed the above-referenced documents (which were previously “suppressed”) on the public docket.

10. Pursuant to C.R.S. § 13-27-101, *et seq.*, I declare under penalty of perjury under the law of Colorado that the foregoing is true and correct.

Further Declarant sayeth naught.

Executed this 9th day of October 2021 in the County of Denver, Colorado.



By:
Christy Orzulak