

DISTRICT COURT, DENVER COUNTY, COLORADO Court Address: 1437 Bannock Street Denver, CO 80202	DATE FILED: October 29, 2021 9:19 PM FILING ID: B401F6B987E09 CASE NUMBER: 2020CV34319
ERIC COOMER, <i>Plaintiff,</i> vs. DONALD J. TRUMP FOR PRESIDENT, INC., et al., <i>Defendants.</i>	▲ COURT USE ONLY ▲
John C. Burns, #21PHV6433 BURNS LAW FIRM P.O. Box 191250 Saint Louis, MO 63119 Telephone: 314-329-5040 Facsimile: 314-282-8136 E-mail: tblf@pm.me Randy B. Corporon, Esq. Beth Chambers, Esq. Law Offices of Randy B. Corporon, P.C. 2821 S. Parker Rd., Suite 555 Aurora, CO 80014 Telephone: 303-749-0062 Email: rbc@corporonlaw.com <i>Attorneys for Defendants James Hoft and TGP Communications d/b/a The Gateway Pundit</i>	Case No. 2020CV34319 Div. 409
<p style="text-align: center;">DEFENDANTS JAMES HOFT AND TGP COMMUNICATIONS, LLC d/b/a THE GATEWAY PUNDIT'S INDEX OF EXHIBITS CITED PURSUANT TO THE COURT'S ORDER OF 14 OCTOBER 2021.</p>	

Defendants James Hoft and TGP Communications, LLC d/b/a The Gateway (collectively, “**TGP Defendants**”), by and through undersigned counsel, hereby submits the following Index of Exhibits pursuant to the Court’s Order of October 14, 2021. In addition to the exhibits filed below, TGP Defendants also join and incorporate as though fully set forth herein,

all exhibits cited to and utilized by Defendants OAN, Chanel Rion, Sidney Powell, and Eric Metaxas.

Exhibit Number	Description
600	Three (3) Irrelevant TGP Defendant Articles Which Plaintiff Alleges Contain Defamatory Content, Despite the Articles Lacking Any Reference to Plaintiff, Whatsoever [Part of the Sole Nine (9) Articles Plaintiff Claims as the Full Extent of the Universe of Defamatory Content Alleged Against TGP Defendants, Pursuant to Plaintiff’s Response [1460CFD5D4CF7 , 21 July 2021] to TGP Defendants’ Motion for Separate and More Definite Statement [4CA4E2541CD5A , 1 July 2021]]
601	Six (6) Articles Referencing Plaintiff, Which Plaintiff Alleges Contain Defamatory Content Against Plaintiff [Part of the Sole Nine (9) Articles Plaintiff Claims as the Full Extent of the Universe of Defamatory Content Alleged Against TGP Defendants, Pursuant to Plaintiff’s Response [1460CFD5D4CF7 , 21 July 2021] to TGP Defendants’ Motion for Separate and More Definite Statement [4CA4E2541CD5A , 1 July 2021]]
602	James Hoft Affidavit
603	James Hoft Deposition with Exhibits; specifically, pages 44 through 144.
604	Eric Coomer Video Deposition
605	Eric Coomer Deposition Transcript with Exhibits
606	About Page – TheGatewayPundit.Com [From Hoft Deposition]
607	“White House Grants Press Credentials to a Pro-Trump Blog,” Michael Grynbaum, New York Times, 13 Feb. 2017
608	Associated Press News Article in re <i>Curling</i>
609	Eric Coomer’s Denver Post OpEd
610	“He [Eric Coomer] Was the ‘Perfect Villain’ for Voting Conspiracists,” Susan Dominus, New York Times Magazine, 24 Aug. 2021, updated 21 Sept. 2021
611	DEFENDANTS HERRING NETWORKS, INC., D/B/A ONE AMERICA NEWS NETWORK, AND CHANEL RION’S REPLY IN SUPPORT OF THEIR SPECIAL MOTION TO DISMISS PURSUANT TO C.R.S. § 13-20-1101

NOTE: TGP Defendants reserve the right to utilize any and all admissible exhibits, submitted by any party.

Respectfully submitted on October 29, 2021.

Respectfully submitted,
BURNS LAW FIRM

s/ John C. Burns

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CERTIFICATE OF SERVICE

I certify that on October 29, 2021, a true and accurate copy of the foregoing has been e-served via ICCES on all counsel of record.

/s/ John C. Burnes