

DISTRICT COURT, DENVER COURT, COLORADO 1437 Bannock Street, Room 256 Denver, Colorado 80202	DATE FILED: October 29, 2021 4:41 PM FILING ID: FA38EECAECA2B CASE NUMBER: 2020CV34319
<p>Plaintiff: ERIC COOMER, Ph.D.</p> <p>v.</p> <p>Defendants: DONALD J. TRUMP FOR PRESIDENT, INC., SIDNEY POWELL, SIDNEY POWELL, P.C., DEFENDING THE REPUBLIC, INC., RUDOLPH GIULIANI, JOSEPH OLTMANN, FEC UNITED, SHUFFLING MADDNESS MEDIA, INC. dba CONSERVATIVE DAILY, JAMES HOFT, TGP COMMUNICATIONS LLC dba THE GATEWAY PUNDIT, MICHELLE MALKIN, ERIC METAXAS, CHANEL RION, HERRING NETWORKS, INC. dba ONE AMERICA NEWS NETWORK, and NEWSMAX MEDIA, INC.</p>	<p style="text-align: center;">▲ COURT USE ONLY ▲</p>
<p><i>Attorneys for Donald J. Trump for President, Inc.:</i> John S. Zakhem, #30089 Eric R. Holway, #49263 Nicole B. Grimmesey, #55217 Jackson Kelly PLLC 1099 18th Street, Suite 2150 Denver, Colorado 80202 Telephone: 303.390.0003 Facsimile: 303.390.0177 jszakhem@jacksonkelly.com eric.holway@jacksonkelly.com nicole.grimmesey@jacksonkelly.com</p>	<p>Case No.: 2020CV34319</p> <p>Courtroom: 409</p>
<p style="text-align: center;">DEFENDANT, DONALD J. TRUMP FOR PRESIDENT, INC.'S, EVIDENTIARY SPREADSHEET IN SUPPORT OF MOTION TO DISMISS PURSUANT TO C.R.S. § 13-20-1101</p>	

Defendant, Donald J. Trump for President, Inc. (“The Campaign”), by and through its counsel, John S. Zakhem, Eric R. Holway, and the law firm of Jackson Kelly PLLC, hereby submits the following Evidentiary Spreadsheet in Support of its Motion to Dismiss Pursuant to C.R.S. § 13-20-1101:

<u>Defendant Donald J. Trump for President, Inc.’s Proffered Evidence</u>	<u>Plaintiff’s Objection(s)</u>	<u>Defendant Donald J. Trump for President, Inc.’s Response to Plaintiff’s Objections</u>
<p>200</p> <p>Excerpts from the Campaign’s Rule 30(b)(6) Deposition Transcript Vol. 1 at 19:13-21:3; 52:7-9; 52:12-18; 53:1-3; 53:25-54:4; 56:19-23</p>		
<p>201</p> <p>Excerpts from the Campaign’s Rule 30(b)(6) Deposition Transcript Vol. 2 at 27:20-22; 38:2-5; 45:16-20; 47:7-23; 50:9-16</p>		
<p>PEX QQQ</p> <p>PX 0069 - Eric Trump Tweet</p>		
<p>PEX SSS</p> <p>Donald Trump Tweet – Dominionizing the Vote Part 1</p>		
<p>PEX RRR</p> <p>Donald Trump Tweet – Dominionizing the Vote Part 2</p>		
<p>400</p> <p>Exhibit A to Defendant Giuliani’s Anti-SLAPP Motion to Dismiss</p>		
<p>402</p> <p>Exhibit C to Defendant Giuliani’s Anti-SLAPP Motion to Dismiss</p>		

<u>Defendant Donald J. Trump for President, Inc.’s Proffered Evidence</u>	<u>Plaintiff’s Objection(s)</u>	<u>Defendant Donald J. Trump for President, Inc.’s Response to Plaintiff’s Objections</u>
556 Coomer Facebook Post at pg. 9-12; 72-73		
900 Affidavit of Joseph Oltmann, dated November 13, 2020		
901 11-19-2020 RNC Press Conference Transcript		
902 Google search screen shot		
903 Eric Coomer Facebook Posts		
904 Denver Post Article		
906 NY Times Article		
907 Georgia Lawsuit		
908 Michigan Lawsuit		
909 Wisconsin Lawsuit		
910 Arizona Lawsuit		
Powell Declaration, dated April 28, 2021		

Respectfully submitted this 29th day of October 2021.

JACKSON KELLY PLLC

/s/ Eric R. Holway

John S. Zakhem, Esq. #30089

Eric R. Holway, Esq. #49263

Nicole B. Grimmesey, Esq., #55217

1099 18th Street, Suite 2150

Denver, CO 80202

Phone: 303-390-0003

Fax: 303-390-0177

jszakhem@jacksonkelly.com

eric.holway@jacksonkelly.com

nicole.grimmesey@jacksonkelly.com

*Attorneys for Donald J. Trump for
President, Inc.*

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this 29th day of October 2021, a true and correct copy of the foregoing was served via Colorado Court's E-filing System to all counsel of record.

/s/ Angela Maher

Angela Maher