

<p>DISTRICT COURT, DENVER COUNTY,          COLORADO          1437 Bannock Street          Denver, CO 80202</p>	<p>DATE FILED: October 29, 2021 3:48 PM          FILING ID: CA278A7C978F2          CASE NUMBER: 2020CV34319</p>
<p>ERIC COOMER, Ph.D.,          Plaintiff</p> <p>vs.</p> <p>DONALD J. TRUMP FOR PRESIDENT,          INC., et al.,          Defendants</p>	<p>▲ COURT USE ONLY ▲</p>
<p><b>Attorneys for Plaintiff</b>          Charles J. Cain, No. 51020  <a href="mailto:ccain@cstrial.com">ccain@cstrial.com</a>          Steve Skarnulis, No. 21PHV6401  <a href="mailto:skarnulis@cstrial.com">skarnulis@cstrial.com</a>          Bradley A. Kloewer, No. 50565  <a href="mailto:bkloewer@cstrial.com">bkloewer@cstrial.com</a>          Zachary H. Bowman, No. 21PHV6676  <a href="mailto:zbowman@cstrial.com">zbowman@cstrial.com</a>  <b>CAIN &amp; SKARNULIS PLLC</b>          P. O. Box 1064          Salida, Colorado 81201          719-530-3011 /512-477-5011 (Fax)</p> <p>Thomas M. Rogers III, No. 28809  <a href="mailto:trey@rklawpc.com">trey@rklawpc.com</a>          Mark Grueskin, No. 14621  <a href="mailto:mark@rklawpc.com">mark@rklawpc.com</a>          Andrew E. Ho, No. 40381  <a href="mailto:andrew@rklawpc.com">andrew@rklawpc.com</a>  <b>RECHTKORNFELD PC</b>          1600 Stout Street, Suite 1400          Denver, Colorado 80202          303-573-1900</p>	<p>Case Number: 2020cv034319</p> <p>Division Courtroom: 409</p>
<p align="center"><b>PLAINTIFF'S EVIDENCE IN SUPPORT OF OMNIBUS RESPONSE TO          DEFENDANTS' SPECIAL MOTIONS TO DISMISS          PURSUANT TO C.R.S. § 13-20-1101</b></p>	

**Chart of Exhibits – Plaintiff Coomer Evidence**

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant’s Objections</b>	<b>Plaintiff’s Response as to Why Admissible</b>
<b>EXHIBITS FILED WITH PLAINTIFF’S OMNIBUS RESPONSE TO ALL DEFENDANTS’ anti-SLAPP MOTIONS (FILING ID E9E5DD591D201)</b>				
A	Eric Coomer Declaration			
A-1	Defamation Spreadsheet			
A-2	Defamation Spreadsheet Links			
B-1	08-11-21 Joe Oltmann Depo Transcript and Exhibits			
B-2	09-08-21 Joe Oltmann Depo Transcript and Exhibits			
B-2	PX 103 FEC United emails			
B-2	PX 104 11-24-20 text to Jim Hoft			

<sup>1</sup> Identified in Plaintiff’s Omnibus Response.

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
B-2	PX 105 08-02-21 Oltmann Telegram post re connect to Ron Watkins			
B-2	PX 106 03-26-21 Halderman analysis of Antrim County Election Incident			
B-2	PX 107 November 2020 Michigan Oversight Committee Report			
B-2	PX 108 Oltmann research re Coomer			
B-2	PX 109 November 2020 emails re Lyons			
B-2	PX 110 11-06-20 Coomer Facebook post re vote			
B-2	PX 111 11-12-20 CISA Statement			
B-2	PX 131 Joseph A. Camp posting			
B-3	11-09-21 Video of Conservative Daily Podcast			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
B-4	11-09-20 Transcript of Conservative Daily Podcast			
B-5	09-26-20 Oltmann Google Search Results; 20CV3419-JOdisclosures-0199			
B-6	12-28-20 Conservative Daily Podcast			
B-7	10-12-20 CO Times Recorder: Conservative Group Behind Deadly "Patriot Muster" Rally Working Closely with Colorado GOP			
B-8	09-09-20 Conservative Daily Podcast			
B-9	08-05-20 Conservative Daily Podcast			
B-10	11-05-21 Conservative Daily Podcast			
B-11	11-06-20 Conservative Daily Podcast			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
B-12	12-05-20 Oltmann Parler post			
C-1	08-11-21 FEC United (Butler) Depo Transcript and Exhibits			
C-1	PX 89 Deposition Notice of FEC United			
C-1	PX 90 Notes from FEC rep regarding deposition topics			
C-2	09-09-21 FEC United (Oltmann) Depo Transcript and Exhibits			
C-2	PX 112 Deposition notice for FEC United			
C-2	PX 113 DE Secretary of State information re FEC United			
C-2	PX 114 0265_fecunited_Donald J. Trump for President email search results			
C-2	PX 115 Photo of broken phone			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
D-1	08-11-21 CD Solutions (Pappas) Depo Transcript and Exhibits			
D-1	PX 91 Deposition notice for Shuffling Madness Media, Inc. dba Conservative Daily			
D-1	PX 92 CO Secretary of State Filing: Statement of Trade Name for Reporting Entity			
D-1	PX 93 CO Secretary of State Filing: Statement of Trade Name Withdrawal			
D-2	09-09-21 Shuffling Madness Media (Oltmann) Depo Transcript and Exhibits			
D-2	PX 116 Deposition notice for Shuffling Madness Media, Inc.			
D-2	PX 117 DE Secretary of State information re Shuffling Madness Media			
D-2	PX 118 Joe Otto LinkedIn			
D-2	PX 119 Conservative Daily home page			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
D-2	PX 120 12-23-20 Conservative Daily donate			
D-2	PX 121 03-23-18 Conservative Daily archives			
D-2	PX 122 11-06-20 Conservative Daily: Democrats Just Stole Another State from Trump!			
D-2	PX 123 12-30-20 Conservative Daily: Breaking We Have Enough Votes to Challenge Biden's Win!			
D-2	PX 124 Advocacy to Action home page			
D-2	PX 125 datalead Max McGuire profile			
D-2	PX 127 07-05-14 Conservative Daily Facebook post			
D-2	PX 128 Max McGuire LinkedIn			
D-2	PX 129 09-08-14 Conservative Daily webpage: Advocacy to Action			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
D-2	PX 132 09-08-14 Conservative Daily webpage: Advocacy to Action			
D-2	PX 133 03-23-18 Conservative Daily webpage			
D-3	09-09-21 CD Solutions (Oltmann) Depo Transcript and Exhibits			
D-3	PX 134 11-09-20 video clip from Conservative Daily podcast			
D-3	PX 135 11-09-20 video clip from Conservative Daily podcast			
D-3	PX 136 11-30-20 video clip from Conservative Daily podcast			
D-4	Conservative Daily Screenshots with Ratings			
D-5	01-05-21 Email from <a href="mailto:theresearcher2020@yandex.com">theresearcher2020@yandex.com</a> to <a href="mailto:info@conservative-daily.com">info@conservative-daily.com</a>			
D-6	PX 137 Oltmann research re Coomer			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo Transcript and Exhibits			
E-1	PX 75 06-10-20 text correspondence between Joe Oltmann and James Hoft			
E-1	PX 76 11-13-20 text from Jenny Beth Martin introducing James Hoft to Randy Corporon			
E-1	PX 77 Text message: text you privately re Dominion			
E-1	PX 78 11-24-20 text from James Hoft to Joseph Oltmann			
E-1	PX 79 12-23-20 text from Joesph Oltmann to James Hoft			
E-1	PX 80 Text message btwn Hoft & Oltmann: has anyone seen Coomer?			
E-1	PX 81 Text message: introduction of Corporon and Hoft			
E-1	PX 82 11-15-20 text from Randy Corporon to James Hoft			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
E-1	PX 83 11-16-20 text from James Hoft to Randy Corporon			
E-1	PX 84 11-16-20 text from Randy Corporon to James Hoft			
E-1	PX 85 11-24-20 text from Joseph Oltmann to James Hoft			
E-1	PX 86 11-13-20 article by Jim Hoft: "Dominion Voting Systems Officer of Strategy and SECURITY Eric Coomer Admitted in 2016 Vendors and Election Officials Have Access to Manipulate the Vote"			
E-1	PX 87 TGP News Article: Report: Anti-Trump Dominion Voting Systems Security Chief Was Participating in Antifa Calls, Posted Antifa Manifesto Letter to Trump Online			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	PX 88 TGP News Article: Georgia Secretary of State Brad Raffensperger's Update to Georgia's Voting Machine Software Right Before the 2020 Election Was Unlawful and Violates Any Certification of State Results			
E-2	11-15-20 TGP Article: It's Massive, Criminal Voter Fraud!			
E-3	11-16-20 TGP Article Denver Business Owner: Dominion's Eric Coomer Is an Unhinged Sociopath – His Internet Profile Is Being Deleted and Erased			
E-3a	11-16-20 TGP Article Denver Business Owner: Dominion's Eric Coomer Is an Unhinged Sociopath – His Internet Profile Is Being Deleted and Erased (AUDIO)			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-4	11-23-20 TGP Article: BREAKING: SECOND VIDEO REVEALED of Dominion Voting System's Eric Coomer Explaining to Election Officials How to Switch Votes			
E-5	11-24-20 TGP Article: NEW ERIC COOMER VIDEO UNCOVERED: Admits in 2015 Dominion Machines DO NOT Have Ability to Root Out Fraudulent Ballots			
E-6	11-24-20 TGP Article: CONFIRMED: Georgia Secretary of State Brad Raffensperger Used Dominion's Eric Coomer as Witness for the Tate to Defend LAST MINUTE COMPUTER CHANGES			
E-7	11-26-20 TGP Article: Not Only Was Dominion Prone to Attack from China and Iran – It Was Also Connected to Pro-Obama Entity Known as ACORN			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-8	11-27-20 TGP Article: BALD-FACED LIES: Dominion Says Assertions of Vote Switching Are "Completely False" – But We Have Two Videos of Dominion Executive Eric Coomer Showing How to Switch Votes			
E-9	12-17-20 TGP Article: More On Dominion Voting Machines: They Could Easily Duplicate Votes and Security Threats Were Virtually Ignored			
E-10	12-27-20 TGP Article: Developing: Dominion's Anti-Trump Executive Eric Coomer Owns Patents on Adjudication Process That Investigators Found Skimmed Votes from Trump in Michigan			
E-11	12-28-20 TGP Article: WAKE UP AMERICA! Bold Billionaire Offers \$1 Million Bounty for Dominion's, Eric Coomer's Comeuppance			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
E-12	02-22-21 TGP Article: WE CAUGHT THEM: Matt Crane, Critic of TGP's Article on Obvious Questions of the 2020 Election Results in Colorado, Was Not Forthright – Turns Out His Wife Worked for Dominion and Sequoia for Over a Decade			
E-13	08-02-21 TGP Article: What a Piece of Work – We Caught Him Again: Self-Described Colorado 'Republican' Matt Crane Caught at Dominion Party with Democrat Leaders and Eric Coomer			
E-14	08-03-21 TGP Article: The Election Group's Jennifer Morrell Sided with Corrupt Arizona Secretary of State After the Election but Then Later Took Down Her Tweet			
E-15	10-24-20 New York Times Article: How the Epoch Times Created a Giant Influence Machine			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-16	12-28-20 The Detroit News Article: Dominion Tells Mellissa Carone to cease 'defamatory claims'			
E-17	10-31-20 TGP Article: ROGER STONE EXCLUSIVE: How the Democrats Plan to Steal the 2020 Election			
E-18	10-23-20 TGP Article: 2020 Election Prediction: Despite Massive Headwinds and Democrat Attempts to Steal Election, President Trump Will Win in Larger Landslide than 2016			
E-19	10-18-20 TGP Article: 4Chan Users Claim to Have Found Way to Easily Change People's Voter Registration and Cancel Ballots Online in Oregon and Washington			
E-20	10-17-20 TGP Article: ELECTION FRAUD: Pennsylvania Rejects 334,000 Duplicate Ballots Already; Kentucky Reports Bins of Ballots Discarded			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-1	07-27-21 Michelle Malkin Depo Transcript and Exhibits			
F-1	PX 15 11-13-20 live-stream interview of Joe Oltmann by Michelle Malkin			
F-1	PX 16 11-13-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors			
F-1	PX 17 11-28-20 Newsmax broadcast of Sovereign Nation with Michelle Malkin			
F-1	PX 18 11-25-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors			
F-1	PX 19 11-13-20 Michelle Malkin tweet re "Joe Oltmann (now banned on Twitter)"			
F-1	PX 20 11-13-20 Michelle Malkin tweet of full Joe Oltmann interview			
F-1	PX 21 11-13-20 Michelle Malkin Twitter reply "What are they trying to hide?"			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-1	PX 22 11-15-20 Michelle Malkin tweet re "Dominion, Antifa & #EricCoomer," etc.			
F-1	PX 23 11-16-20 Michelle Malkin tweet re Denver Business Owner: Dominion's Eric Coomer in an Unhinged Sociopath, etc.			
F-1	PX 24 11-19-20 Michelle Malkin repost of Joe Oltmann interview			
F-1	PX 25 Series of Signal text messages between Randy Corporon and Michelle Malkin			
F-1	PX 26 11-25-20 email from Michelle Malkin to Pierce Sargeant re Sovereign Nation – Wednesday pretape – guest/contact info			
F-1	PX 27 State of Colorado Uniform Voting Submission			
F-1	PX 28 Affidavit of Joe Oltmann			
F-1	PX 30 Newsmax retraction of Coomer coverage			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-2	PX29 Oltmann notes re Antifa call			
F-3	11-13-20 #MalkinLive Transcript			
F-4	11-13-20 Malkin tweet			
F-5	09-30-20 Rasmussen Reports: Political Commentary by Michelle Malkin: Who's Funding Shady Ballot Harvesting Schemes?			
F-6	12-18-19 Rasmussen Reports: Political Commentary by Michelle Malkin: Out of the Shadows... and Into the Voting Booth?			
G-1	08-13-21 Eric Metaxas Depo Transcript and Exhibits			
G-1	PX 94 11-24-20 email chain between Albin Sadar, Susan Pausky, Eric Metaxas, Joe Oltmann			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-1	PX 95 11-25-20 email between Pausky, Metaxas, Sadar (show producer), and Oltmann "Bless entire team! You are rocking it"			
G-1	PX 96 The Eric Metaxas Radio Show: Joe Oltmann Discusses How a Security Genius at Dominion Voting Promised Antifa Members a Trump Loss			
G-1	PX 97 11-24-20 transcript of Eric Metaxas Show podcast			
G-2	11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video			
G-3	11-24-20 Metaxas tweet			
G-4	01-04-21 Metaxas tweet			
G-5	11-07-20 Metaxas tweet			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-6	11-25-20 The Eric Metaxas Show: Businessman Joe Oltmann continues revealing his inside information of how Eric Coomer, a security genius for Dominion Voting Systems, assured Antifa members that Trump would never win re-election			
G-7	12-03-20 The Eric Metaxas Show: Kevin McCullough has late-breaking news about the ownership of Dominion voting machines, plus, shares an update of where the swing states are with correcting huge ballot discrepancies			
G-8	12-21-20 The Eric Metaxas Show: Steve Bannon from Sunday night's "prayer call"; Steve brings us up to speed with the president's path to victory and deals directly with those two explosive words, "Martial Law."			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-9	05-11-20 The Eric Metaxas Show: Attorney Jenna Ellis—On Democrats Changing Election Laws for the 2020 Election			
H-1	08-09-21 Chanel Rion Depo Transcript and Exhibits			
H-1	PX 56 08-2019: DEF CON 27 Voting Machine Hacking Village Report			
H-1	PX 57 Screenshot of Professor Halderman from OAN's "Dominion-izing the Vote" piece			
H-1	PX 58 11-16-20 Scientists say no credible evidence of computer fraud in the 2020 election outcome, but policymakers must work with experts to improve confidence			
H-1	PX 59 Screenshot of Ron Watkins			
H-1	PX 60 Series of tweets by Ron@CodeMonkeyZ			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
H-1	PX 61 11-17-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors			
H-2	11-17-20 Rion tweet			
H-3	11-29-21 Top Dominion Exec: Trump Is Not Going to Win. I Made F***ing Sure of That, November 29, 2020, YouTube			
I-1	07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo Transcript and Exhibits			
I-1	PX 31 Declaration of Charles Herring in Support of Motion to Dismiss Pursuant to Colorado's anti-SLAPP statute, Colo. Rev. Stat. § 13-20-110			
I-1	PX 32 OAN "Dominion-izing the Vote" video			
I-1	PX 33 11-16-20 Chanel Rion tweet quoting Ron@CodeMonkeyZ			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
I-1	PX 34 11-10-20 email from Joe Oltmann to contact re One America News Network Contact form			
I-1	PX 35 11-10-20 email from Joe Oltmann to Taylor Scott re Voter Fraud Follow Up			
I-1	PX 36 11-15-20 email from Charles Herring to Chanel Rion, Christina Bobb re Eric Coomer			
I-1	PX 37 11-15-20 email from Joe Oltmann to Chanel Rion re Responding to your LinkedIn Message			
I-1	PX 38 11-15-20 email from Joe Oltmann to Chanel Rion re Voter Fraud Follow Up			
I-1	PX 39 11-16-20 email from Charles Herring to Kara McKinney, Alexander Salvi, Da Ball, Stephanie Hamill re Who is Eric Coomer? Potentially the "smoking gun" at Dominion for 2020 Voter Rigging			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	PX 40 11-16-20 email from Chanel Rion to Joe Oltmann re email 5 capture 1-10 please confirm receipt			
I-1	PX 41 12-22-20 text message from C Herring to ?? re can we counter sue Coomer			
I-1	PX 42 02-01-21 email chain between C Bobb, C Herring and C Rion regarding Coomer document			
I-1	PX 43 Text messages between Rudy Giuliani and Charles Herring			
I-1	PX 44 03-11-21 text between Charles Herring and Christina Bobb			
I-1	PX 45 05-03-21 email chain regarding Newsmax retraction and boycott of Newsmax			
I-1	PX 46 Joe Oltmann Parler post re Eric Coomer			
I-2	09-03-20 OAN Newsroom Article: Several States Investigating Accounts of Mail-In Voter Fraud			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-3	09-19-20 OAN Newsroom Article: President Trump Slams Mail-In Voting As A 'Scam,' Says It Will Be 'A Disaster'			
I-4	09-27-20 OAN Newsroom Article: AG Barr: Mail-In Ballots Enable Fraud, Voter Coercion			
J-1	08-14-21 Rudolph Giuliani Depo Transcript and Exhibits			
J-1	PX 98 04-29-21 declaration of Rudolph Giuliani in support of anti-SLAPP motion to dismiss			
J-1	PX 99 06-25-21 Giuliani Objections to Plaintiff's Requests for Production Relating to Special Motion to Dismiss			
J-1	PX 100 Press Conference photo			
J-1	PX 101 11-19-20 video clip from press conference re cheating			
J-1	PX 102 06-07-21 Jan Wolfe tweet: newly disclosed emails shows OAN reporter was working for Giuliani			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
J-2	11-15-20 Maria Bartiromo and Giuliani interview video			
J-3	11-17-20 Tennessee Star News Article: Trump Lawyers Powell and Giuliani Claim 'Massive' Vote Rigging by Dominion, Allege Company Link to Antifa			
J-4	11-12-20 Lou Dobbs and Giuliani interview video			
K-1	07-20-21 Sidney Powell/Sidney Powell, P.C. Depo Transcript and Exhibits			
K-1	PX 1 McLaughlin-Malkin text message			
K-1	PX 2 Affidavit of Joseph Oltmann			
K-1	PX 3 11-19-20 transcript of news conference			
K-1	PX 4 11-20-20 video clip from Howie Carr show			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	PX 5 11-20-20 video clip from Maria Bartiromo interview of Powell on Fox News			
K-1	PX 6 Trump tweet: legal team			
K-1	PX 7 11-22-20 Politico article "Trump Campaign Cuts Sidney Powell from President's Legal Team"			
K-1	PX 8 01-22-21 text message from Powell regarding Restore the Republic PAC			
K-1	PX 9 Powell tweet: adjudication			
K-1	PX 10 07-13-21 privilege log			
K-1	PX 11 04-01-20 Powell tweet: adjudication			
K-1	PX 12 Video "Eric Coomer Explains How to Alter Votes in the Dominion System"			
K-1	PX 13 06-02-21 Powell tweet: contradictions			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	PX 14 12-23-20 video: Coomer contradictions by defendingtherepublic.org			
K-2	11-19-20 Powell video from press conference			
K-3	02-01-21 Above the Law Article: RNC Chair Has Regrets About Letting Rudy Giuliani and Sidney Powell Spew Legal Word Vomit at Her HQ			
K-4	11-20-20 Howie Carr Show with Sidney Powell			
K-5	11-26-20 Defending the Republic solicitation webpage			
K-6	11-07-20 FOX Business: Lou Dobbs, Sidney Powell: Trump has to fight for election integrity			
K-7	Sidney Powell, Licensed to Lie (2 <sup>nd</sup> ed. 2018) (citation only)			
K-8	12-08-20 New York Times Article: What We Know About Sidney Powell, the Lawyer Behind Wild Voting Conspiracy Theories			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
L-1	08-04-21 Defending the Republic Depo Transcript and Exhibits			
L-1	PX 47 07-12-21 deposition notice			
L-1	PX 48 11-14-20 Fox News: Sidney Powell			
L-1	PX 49 07-09-21 Responses to Plaintiff's Limited Discovery Requests			
L-1	PX 50 Media posts re various lawsuits			
L-1	PX 51 11-14-20 Lou Dobbs: Interview with Sidney Powell; Dominion Denies Claims About Software Issues; Multiple Reports Seem to Show Otherwise			
L-1	PX 52 08-03-21 Texas Secretary of State information re Defending the Republic			
L-1	PX 53 11-25-20 Pearson vs. Kemp; GA complaint			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
L-1	PX 54 12-02-20 Bower v Ducey; AZ complaint			
L-1	PX 55 Links re videos & posting on DTR website			
L-2	11-10-20 Lou Dobbs tweet			
M-1	08-09-21 Donald J. Trump for President, Inc. Depo Transcript and Exhibits			
M-1	PX 62 07-19-20 Fox News Sunday article re Chris Wallace interview with Donald Trump			
M-1	PX 63 11-04-20 Video: Trump Frankly We Did Win This Election			
M-1	PX 64 11-04-20 Trump tweet: We are up BIG, but they are trying to STEAL the Election			
M-1	PX 65 11-07-20 Video: Giuliani Four Seasons Landscaping Press Conference			
M-1	PX 66 11-12-20 Trump tweet: Dominion deleted 2.7 million Trump votes			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
M-1	PX 67 11-12-20 CISA Joint Statement			
M-1	PX 68 11-14-20 Trump campaign memo			
M-1	PX 69 11-17-20 Eric Trump tweet re Coomer			
M-1	PX 70 11-21-20 Trump tweet: Dominion-izing the Vote Part Two			
M-1	PX 71 Trump retweet: Dominion-izing the Vote			
M-1	PX 72 07-23-21 DJTFP response to Plaintiff's requests for production relating to special motion to dismiss			
M-1	PX 73 08-04-21 DJTFP privilege log			
M-1	PX 74 07-09-21 DJTFP deposition notice			
M-2	08-13-21 Donald J. Trump for President, Inc. Depo Transcript			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
M-3	11-14-20 Trump tweet			
M-4	11-18-20 Trump tweet			
M-5	11-19-20 Trump tweet			
M-6	11-21-20 Trump tweets			
M-7	01-31-21 New York Times Article: 77 Days: Trump's Campaign to Subvert the Election			
M-8	11-08-20 Trump tweet			
N	Frederick W. Brown, Jr. Declaration			
N-1	Curriculum Vitae			
O	J. Alex Halderman Declaration			



Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
O-1	Curriculum Vitae			
O-2	Declaration of Ronald Watkins, filed Dec. 2, 2020, Civil Action No. 2:20-cv-023221-DJH; <i>Bowyer, et al. v. Ducey, et al.</i> ; In the United States District Court for the District of Arizona [Dkt. 1-6]			
O-3	Declaration of Ronald Watkins, filed Nov. 25, 2020, Civil Action No. 2:20-cv-13134-LVP-RSW; <i>King, et al. v. Whitmer, et al.</i> ; In the United States District Court for the Eastern District of Michigan [Dkt. 1-16]			
O-4	Declaration of Ronald Watkins, filed Dec. 1, 2020, Civil Action No. 2:20-cv-1771; <i>Feehan, et al. v. Wisconsin Elections Commission, et al.</i> ; In the United States District Court for the Eastern District of Wisconsin			
P	Mike Rothschild Declaration			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
Q	Heidi Beedle Declaration			
R	Marty Golingan Declaration			
S	<i>Intentionally Left Blank</i>			
T	Erik Maulbetsch Declaration			
U	Tay Anderson Declaration			
V	Charles J. Cain Declaration			
V-1	08-18-21 Demand for Retraction			
V-2	06-24-21 New York Bar Association Opinion re Giuliani			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
V-3	08-11-21 Memorandum Opinion issued in proceedings pending before the United States District Court for the District of Columbia, styled <i>US Dominion, Inc., et al. v. Sidney Powell, et al.</i> ; Civil Action No. 1:21-cv-00040; <i>US Dominion, Inc. et al. v. Rudolph W. Giuliani, et al.</i> ; Civil Action No. 1:21-cv-00213; and <i>US Dominion, Inc., et al. v. My Pillow, Inc., et al.</i> ; Civil Action No. 1:21-cv-00445			
V-4	08-25-21 Opinion and Order issued in a proceeding pending before the United States District Court of the Eastern District of Michigan, Southern Division, styled <i>Timothy King et al. v. Gretchen Whitmer, et al. and City of Detroit, et al.</i> ; Civil Case No. 20 13134			
V-5	07-07-21 Hearing Transcript			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
W	Doug Bania Declaration			
W-1	07-02-21 Advance Democracy, Inc. Reports: Threats Against Eric Coomer on Twitter			
<b>EXHIBITS FILED WITH PLAINTIFF'S RESPONSE TO METAXAS'S anti-SLAPP MOTION (FILING ID BEE8153848339)</b>				
	Declaration of Dr. Eric Coomer dated April 7, 2021 Metaxas Response EX A			
B-3	Conservative Daily Podcast dated November 9, 2020 Metaxas Response EX A-1			
B-4	Transcript of Conservative Daily Podcast dated November 9, 2020 Metaxas Response EX A-1			
	Conservative Daily Podcast dated July 21, 2020 Metaxas Response EX A-3			
G-1	The Eric Metaxas Radio Show dated November 24, 2020 (PX 96)			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
G-1	Transcript of The Eric Metaxas Radio Show dated November 24, 2020 (PX 97)			
	Transcript of video referenced in The Eric Metaxas Radio Show dated November 24, 2020 Metaxas Response EX A-6			
G-6	The Eric Metaxas Radio Show dated November 25, 2020 Metaxas Response EX A-7			
	Transcript of The Eric Metaxas Radio Show dated November 25, 2020 Metaxas Response EX A-8			
G-7	The Eric Metaxas Radio Show dated December 3, 2020 Metaxas Response EX A-9			
G-8	The Eric Metaxas Radio Show dated December 21, 2020			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
	Eric Metaxas (@ericmetaxas), Twitter (Nov. 7, 2020, 4:35 PM) Metaxas Response EX A-11			
G-3	Eric Metaxas (@ericmetaxas), Twitter (Nov. 24, 2020, 5:26 PM) Metaxas Response EX A-12			
G-4	Eric Metaxas (@ericmetaxas), Twitter (Jan. 4, 2021, 2:22 PM) Metaxas Response EX A-13			
	Eric Metaxas (@ericmetaxas), Instagram (Nov. 16, 2020) Metaxas Response EX A-14			
B-2	CISA, Joint Statement from Elections Infrastructure Gov't Coordinating Council & the Election Infrastructure Sector Coordinative Exec. Comms. (PX 11) Metaxas Response EX A-15			
	Miscellaneous Social Media Posts by Oltmann Metaxas Response EX A-16			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
<b>VIDEO CLIPS (FILING IDs C858F92176C91 and 92DF834337F7A)</b>				
M-1	CLIP 1, 08-09-21 Donald J. Trump for President, Inc. 28:9-22			
M-1	CLIP 2, 08-09-21 Donald J. Trump for President, Inc. 30:11-31:9			
M-1	CLIP 3, 08-09-21 Donald J. Trump for President, Inc. 32:6-24			
M-1	CLIP 4, 08-09-21 Donald J. Trump for President, Inc. 37:18-24			
M-1	CLIP 5, 08-09-21 Donald J. Trump for President, Inc. 42:20-43:22			
M-1	CLIP 6, 08-09-21 Donald J. Trump for President, Inc. 48:9-49:11			
M-1	CLIP 7, 08-09-21 Donald J. Trump for President, Inc. 67:14-18			
M-1	CLIP 8, 08-09-21 Donald J. Trump for President, Inc. 72:7-73:7			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
M-1	CLIP 9, 08-09-21 Donald J. Trump for President, Inc. 74:10-18			
M-1	CLIP 10, 08-09-21 Donald J. Trump for President, Inc. 75:4-6			
M-1	CLIP 11, 08-09-21 Donald J. Trump for President, Inc. 76:15-77:23			
M-2	CLIP 12, 08-13-21 Donald J. Trump for President, Inc. 25:10-14			
M-2	CLIP 13, 08-13-21 Donald J. Trump for President, Inc. 32:14-33:3			
M-2	CLIP 14, 08-13-21 Donald J. Trump for President, Inc. 38:6-39:19			
M-2	CLIP 15, 08-13-21 Donald J. Trump for President, Inc. 39:21-25			
M-2	CLIP 16, 08-13-21 Donald J. Trump for President, Inc. 42:5-22			
M-2	CLIP 17, 08-13-21 Donald J. Trump for President, Inc. 44:2-12			



Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
L-1	CLIP 18, 08-04-21 Defending the Republic Depo 14:11-19			
L-1	CLIP 19, 08-04-21 Defending the Republic Depo 21:23-22:13			
L-1	CLIP 20, 08-04-21 Defending the Republic Depo 25:7-24			
L-1	CLIP 21, 08-04-21 Defending the Republic Depo 29:14-30:15			
L-1	CLIP 22, 08-04-21 Defending the Republic Depo 33:9-24			
L-1	CLIP 23, 08-04-21 Defending the Republic Depo 34:18-25			
L-1	CLIP 24, 08-04-21 Defending the Republic Depo 56:11-18			
L-1	CLIP 25, 08-04-21 Defending the Republic Depo 57:6-24			
L-1	CLIP 26, 08-04-21 Defending the Republic Depo 63:16-24			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
J-2	CLIP 27, 11-15-20 Maria Bartiromo and Giuliani interview video 2:45			
K-2	CLIP 28, 11-19-20 Giuliani Press Conference 0:00			
K-2	CLIP 29, 11-19-20 Giuliani Press Conference 1:07:59			
J-1	CLIP 30, 08-14-21 Rudolph Giuliani Depo 40:10-20			
J-1	CLIP 31, 08-14-21 Rudolph Giuliani Depo 42:8-43:9			
J-1	CLIP 32, 08-14-21 Rudolph Giuliani Depo 54:20-55:12			
J-1	CLIP 33, 08-14-21 Rudolph Giuliani Depo 55:13-57:17			
J-1	CLIP 34, 08-14-21 Rudolph Giuliani Depo 59:5-60:5			
J-1	CLIP 35, 08-14-21 Rudolph Giuliani Depo 60:19-61:13			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
J-1	CLIP 36, 08-14-21 Rudolph Giuliani Depo 81:21-83:7			
J-1	CLIP 37, 08-14-21 Rudolph Giuliani Depo 83:21-84:3			
J-1	CLIP 38, 08-14-21 Rudolph Giuliani Depo 92:14-94:12			
J-1	CLIP 39, 08-14-21 Rudolph Giuliani Depo 108:16-109:7			
J-1	CLIP 40, 08-14-21 Rudolph Giuliani Depo 109:24-111:7			
J-1	CLIP 41, 08-14-21 Rudolph Giuliani Depo 119:19-122:13			
J-1	CLIP 42, 08-14-21 Rudolph Giuliani Depo 133:2-134:15			
J-1	CLIP 43, 08-14-21 Rudolph Giuliani Depo 144:6-20			
J-1	CLIP 44, 08-14-21 Rudolph Giuliani Depo 154:23-157:9			
J-1	CLIP 45, 08-14-21 Rudolph Giuliani Depo 159:18-160:7			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
J-1	CLIP 46, 08-14-21 Rudolph Giuliani Depo 160:17-162:12			
J-1	CLIP 47, 08-14-21 Rudolph Giuliani Depo 163:10-19			
J-1	CLIP 48, 08-14-21 Rudolph Giuliani Depo 165:5-24			
J-1	CLIP 49, 08-14-21 Rudolph Giuliani Depo 171:18-174:22			
I-1	CLIP 50, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 17:9-21			
I-1	CLIP 51, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 18:11-24			
I-1	CLIP 52, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 19:9-14			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	CLIP 53, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 20:2-11			
I-1	CLIP 54, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 21:1-11			
I-1	CLIP 55, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 22:10-15			
I-1	CLIP 56, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 23:16-24:9			
I-1	CLIP 57, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 26:18-27:8			
I-1	CLIP 58, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 30:5-22			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	CLIP 59, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 35:3-9			
I-1	CLIP 60, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 39:9-23			
I-1	CLIP 61, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 46:21-47:6			
I-1	CLIP 62, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 63:10-21			
I-1	CLIP 63, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 79:5-80:11			
I-1	CLIP 64, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 80:12-16			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	CLIP 65, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 87:17-25			
I-1	CLIP 66, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 97:7-20			
I-1	CLIP 67, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 97:24-98:2			
I-1	CLIP 68, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 101:4-15			
I-1	CLIP 69, 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 106:10-107:15			
E-3a	CLIP 70, 11-16-20 Gateway Pundit interview with Joe Oltmann 0:15			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-3a	CLIP 71, 11-16-20 Gateway Pundit interview with Joe Oltmann 1:40			
E-3a	CLIP 72, 11-16-20 Gateway Pundit interview with Joe Oltmann 13:18			
E-3a	CLIP 73, 11-16-20 Gateway Pundit interview with Joe Oltmann 15:58			
E-1	CLIP 74, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 20:25-22:7			
E-1	CLIP 75, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 21:20-22:7			
E-1	CLIP 76, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 26:13-27:12			
E-1	CLIP 77, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 29:17-30:15			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	CLIP 78, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 32:17-33:12			
E-1	CLIP 79, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 35:4-18			
E-1	CLIP 80, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 35:19-36:10			
E-1	CLIP 81, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 36:11-37:13			
E-1	CLIP 82, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 38:3-15			
E-1	CLIP 83, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 40:10-17			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	CLIP 84, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 46:15-17			
E-1	CLIP 85, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 46:18-20			
E-1	CLIP 86, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 47:1-48:10			
E-1	CLIP 87, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 51:6-10			
E-1	CLIP 88, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 51:23-52:10			
E-1	CLIP 89, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 52:11-53:23			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	CLIP 90, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 53:24-54:10			
E-1	CLIP 91, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 58:15-23			
E-1	CLIP 92, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 61:15-62:17			
E-1	CLIP 93, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 62:18-63:18			
E-1	CLIP 94, 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 73:18-74:20			
F-1	CLIP 95, 11-13-20 #MalkinLive Interview with Joe Oltmann 1:20 (PX 15)			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
F-1	CLIP 96, 11-13-20 #MalkinLive Interview with Joe Oltmann 3:51 (PX 15)			
F-1	CLIP 97, 11-13-20 #MalkinLive Interview with Joe Oltmann 5:15 (PX 15)			
F-1	CLIP 98, 11-13-20 #MalkinLive Interview with Joe Oltmann 13:40 (PX 15)			
F-1	CLIP 99, 11-13-20 #MalkinLive Interview with Joe Oltmann 15:59 (PX 15)			
F-1	CLIP 100, 11-13-20 #MalkinLive Interview with Joe Oltmann 22:00 (PX 15)			
F-1	CLIP 101, 11-13-20 #MalkinLive Interview with Joe Oltmann 28:47 (PX 15)			
F-1	CLIP 102, 11-13-20 #MalkinLive Interview with Joe Oltmann 31:06 (PX 15)			
F-1	CLIP 103, 11-28-20 Sovereign Nation interview with Joe Oltmann 0:10 (PX 17)			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-1	CLIP 104, 11-28-20 Sovereign Nation interview with Joe Oltmann 6:05 (PX 17)			
F-1	CLIP 105, 11-28-20 Sovereign Nation interview with Joe Oltmann 10:34 (PX 17)			
F-1	CLIP 106, 11-28-20 Sovereign Nation interview with Joe Oltmann 10:58 (PX 17)			
F-1	CLIP 107, 11-28-20 Sovereign Nation interview with Joe Oltmann 11:23 (PX 17)			
F-1	CLIP 108, 11-28-20 Sovereign Nation interview with Joe Oltmann 11:55 (PX 17)			
F-1	CLIP 109, 11-28-20 Sovereign Nation interview with Joe Oltmann 12:45 (PX 17)			
F-1	CLIP 110, 11-28-20 Sovereign Nation interview with Joe Oltmann 14:21 (PX 17)			
F-1	CLIP 111, 11-28-20 Sovereign Nation interview with Joe Oltmann 15:05 (PX 17)			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-1	CLIP 112, 11-28-20 Sovereign Nation interview with Joe Oltmann 16:03 (PX 17)			
F-1	CLIP 113, 11-28-20 Sovereign Nation interview with Joe Oltmann 16:52 (PX 17)			
F-1	CLIP 114, 07-27-21 Michelle Malkin Depo 10:13-15			
F-1	CLIP 115, 07-27-21 Michelle Malkin Depo 10:21-23			
F-1	CLIP 116, 07-27-21 Michelle Malkin Depo 17:8-17			
F-1	CLIP 117, 07-27-21 Michelle Malkin Depo 23:14-24			
F-1	CLIP 118, 07-27-21 Michelle Malkin Depo 25:22-25			
F-1	CLIP 119, 07-27-21 Michelle Malkin Depo 28:1-15			
F-1	CLIP 120, 07-27-21 Michelle Malkin Depo 29:22-30:4			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
F-1	CLIP 121, 07-27-21 Michelle Malkin Depo 43:17-22			
F-1	CLIP 122, 07-27-21 Michelle Malkin Depo 44:9-19			
F-1	CLIP 123, 07-27-21 Michelle Malkin Depo 46:18-47:5			
F-1	CLIP 124, 07-27-21 Michelle Malkin Depo 70:15-22			
F-1	CLIP 125, 07-27-21 Michelle Malkin Depo 71:8-22			
F-1	CLIP 126, 07-27-21 Michelle Malkin Depo 72:7-24			
F-1	CLIP 127, 07-27-21 Michelle Malkin Depo 73:1-16			
F-1	CLIP 128, 07-27-21 Michelle Malkin Depo 79:14-22			
F-1	CLIP 129, 07-27-21 Michelle Malkin Depo 85:21-86:18			
F-1	CLIP 130, 07-27-21 Michelle Malkin Depo 88:5-89:3			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
F-1	CLIP 131, 07-27-21 Michelle Malkin Depo 102:22-103:1			
F-1	CLIP 132, 07-27-21 Michelle Malkin Depo 108:2-9			
F-1	CLIP 133, 07-27-21 Michelle Malkin Depo 109:14-110:2			
F-1	CLIP 134, 07-27-21 Michelle Malkin Depo 113:15-114:10			
F-1	CLIP 135, 07-27-21 Michelle Malkin Depo 118:6-15			
F-1	CLIP 136, 07-27-21 Michelle Malkin Depo 126:8-20			
G-2	CLIP 137, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 0:18			
G-2	CLIP 138, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 4:58			
G-2	CLIP 139, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 5:57			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-2	CLIP 140, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 8:21			
G-2	CLIP 141, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 9:48			
G-2	CLIP 141b, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 13:50			
G-2	CLIP 142, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 14:52			
G-2	CLIP 143, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 16:13			
G-2	CLIP 144, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 17:45			
G-2	CLIP 145, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 19:15			
G-2	CLIP 146, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 23:36			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-2	CLIP 147, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 26:34			
G-2	CLIP 148, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 28:44			
G-2	CLIP 149, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 30:57			
G-2	CLIP 150, 11-24-20 The Eric Metaxas Show: Interview with Joe Oltmann video 31:35			
G-1	CLIP 151, 08-13-21 Eric Metaxas Depo 15:22-16:9			
G-1	CLIP 152, 08-13-21 Eric Metaxas Depo 17:8-15			
G-1	CLIP 153, 08-13-21 Eric Metaxas Depo 21:10-23:1			
G-1	CLIP 154, 08-13-21 Eric Metaxas Depo 24:1-8			
G-1	CLIP 155, 08-13-21 Eric Metaxas Depo 24:9-17			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
G-1	CLIP 156, 08-13-21 Eric Metaxas Depo 28:7-30:20			
G-1	CLIP 157, 08-13-21 Eric Metaxas Depo 30:22-31:10			
G-1	CLIP 158, 08-13-21 Eric Metaxas Depo 34:20-22			
G-1	CLIP 159, 08-13-21 Eric Metaxas Depo 35:13-25			
G-1	CLIP 160, 08-13-21 Eric Metaxas Depo 37:11-17			
G-1	CLIP 161, 08-13-21 Eric Metaxas Depo 38:8-39:9			
G-1	CLIP 162, 08-13-21 Eric Metaxas Depo 39:15-41:11			
G-1	CLIP 163, 08-13-21 Eric Metaxas Depo 46:6-47:7			
G-1	CLIP 164, 08-13-21 Eric Metaxas Depo 52:2-5			
G-1	CLIP 165, 08-13-21 Eric Metaxas Depo 62:8-18			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
G-1	CLIP 166, 08-13-21 Eric Metaxas Depo 68:10-16			
G-1	CLIP 167, 08-13-21 Eric Metaxas Depo 69:22-70:2			
G-1	CLIP 168, 08-13-21 Eric Metaxas Depo 76:22-25			
B-10	CLIP 169, 11-05-21 Conservative Daily Podcast 18:08			
B-10	CLIP 170, 11-05-21 Conservative Daily Podcast 42:53			
B-10	CLIP 171, 11-05-21 Conservative Daily Podcast 49:25			
B-10	CLIP 172, 11-05-21 Conservative Daily Podcast 56:55			
B-11	CLIP 173, 11-06-20 Conservative Daily Podcast 12:16			
B-11	CLIP 174, 11-06-20 Conservative Daily Podcast 43:30			
B-3	CLIP 175, 11-09-20 Conservative Daily Podcast 1:32			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
B-3	CLIP 176, 11-09-20 Conservative Daily Podcast 4:44			
B-3	CLIP 177, 11-09-20 Conservative Daily Podcast 10:53			
B-3	CLIP 178, 11-09-20 Conservative Daily Podcast 16:01			
B-3	CLIP 179, 11-09-20 Conservative Daily Podcast 16:20			
B-3	CLIP 180, 11-09-20 Conservative Daily Podcast 17:10			
B-3	CLIP 181, 11-09-20 Conservative Daily Podcast 23:04			
B-3	CLIP 182, 11-09-20 Conservative Daily Podcast 52:52			
B-3	CLIP 183, 11-09-20 Conservative Daily Podcast 1:05:00			
B-3	CLIP 184, 11-09-20 Conservative Daily Podcast 1:37:22			
A-1	CLIP 185, 11-10-20 Conservative Daily Podcast 28:39 (Pub No. 2)			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
A-1	CLIP 186, 11-10-20 Conservative Daily Podcast 42:42 (Pub No. 2)			
A-1	CLIP 187, 11-11-20 Conservative Daily Podcast 31:20 (Pub No. 3)			
A-1	CLIP 188, 11-14-20 Oltmann Interview with Randy Corporon 10:15 (Pub No. 12)			
A-1	CLIP 189, 11-16-20 Conservative Daily Podcast 3:48 (Pub No. 17)			
A-1	CLIP 190, 11-16-20 Conservative Daily Podcast 10:20 (Pub No. 17)			
D-3	CLIP 191, 11-30-20 Conservative Daily Podcast 29:55 (PX 136)			
A-1	CLIP 192, 12-03-20 Conservative Daily Podcast 47:24 (Pub No. 45)			
A-1	CLIP 193, 12-03-20 Conservative Daily Podcast 48:21 (Pub No. 45)			
A-1	CLIP 194, 12-14-20 Conservative Daily Podcast 42:56 (Pub No. 48)			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
	CLIP 195, 01-05-21 Rally at Freedom Plaza, Washington, D.C. 4:15:20			
B-2	CLIP 196, 09-08-21 Oltmann Depo 15:18-16:1			
B-2	CLIP 197, 09-08-21 Oltmann Depo 56:13-22			
B-2	CLIP 198, 09-08-21 Oltmann Depo 57:24-58:4			
B-2	CLIP 199, 09-08-21 Oltmann Depo 85:19-86:22			
B-2	CLIP 200, 09-08-21 Oltmann Depo 135:1-19			
B-2	CLIP 201, 09-08-21 Oltmann Depo 140:18-22			
C-2	CLIP 202, 09-09-21 FEC United (Oltmann) Depo 18:5-20			
C-2	CLIP 203, 09-09-21 FEC United (Oltmann) Depo 29:11-17			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
C-2	CLIP 204, 09-09-21 FEC United (Oltmann) Depo 30:20-31:20			
C-2	CLIP 206, 09-09-21 FEC United (Oltmann) Depo 33:15-34:10			
C-2	CLIP 207, 09-09-21 FEC United (Oltmann) Depo 35:23-37:7			
C-2	CLIP 208, 09-09-21 FEC United (Oltmann) Depo 38:23-39:13			
D-3	CLIP 209, 09-09-21 Shuffling Madness Media (Oltmann) Depo 25:21-26:12			
D-3	CLIP 210, 09-09-21 Shuffling Madness Media (Oltmann) Depo 28:15-31:22			
D-3	CLIP 211, 09-09-21 Shuffling Madness Media (Oltmann) Depo 36:11-24			
D-3	CLIP 212, 09-09-21 Shuffling Madness Media (Oltmann) Depo 37:25-38:4			
D-3	CLIP 213, 09-09-21 Shuffling Madness Media (Oltmann) Depo 44:15-45:15			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
D-3	CLIP 214, 09-09-21 Shuffling Madness Media (Oltmann) Depo 46:13-47:1			
D-3	CLIP 215, 09-09-21 Shuffling Madness Media (Oltmann) Depo 55:13-56:7			
G-8	CLIP 216, 11-02-20 Powell Interview with Steve Bannon 28:30			
G-8	CLIP 217, 11-02-20 Powell Interview with Steve Bannon 48:59			
K-6	CLIP 218, 11-07-20 FOX Business: Lou Dobbs, Sidney Powell: Trump has to fight for election integrity			
K-6	CLIP 219, 11-07-20 FOX Business: Lou Dobbs, Sidney Powell: Trump has to fight for election integrity			
K-2	CLIP 220, 11-19-20 Powell video from press conference 45:00			
K-4	CLIP 221, 11-20-20 Howie Carr Show with Sidney Powell 11:52			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-4	CLIP 222, 11-20-20 Howie Carr Show with Sidney Powell 13:12			
K-1	CLIP 223, 11-20-20 Powell Interview with Maria Bartiromo 4:10 (PX 5)			
K-1	CLIP 224, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 12:2-9			
K-1	CLIP 225, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 14:21-15:2			
K-1	CLIP 226, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 26:7-27:4			
K-1	CLIP 227, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 32:3-20			
K-1	CLIP 228, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 34:5-35:20			
K-1	CLIP 229, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 46:20-23			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	CLIP 230, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 49:6-19			
K-1	CLIP 231, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 50:16-23			
K-1	CLIP 232, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 58:4-19			
K-1	CLIP 233, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 65:18-21			
K-1	CLIP 234, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 70:13-71:5			
K-1	CLIP 235, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 81:3-82:15			
K-1	CLIP 236, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 82:24-83:10			
K-1	CLIP 237, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 86:21-87:13			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	CLIP 238, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 94:18-95:3			
K-1	CLIP 239, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 95:9-96:3			
K-1	CLIP 240, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 97:2-5			
K-1	CLIP 241, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 101:16-102:6			
K-1	CLIP 242, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 104:25-105:24			
K-1	CLIP 243, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 106:18-107:10			
K-1	CLIP 244, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 124:8-16			
K-1	CLIP 245, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 125:13-21			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
K-1	CLIP 246, 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 125:22-126:13			
I-1	CLIP 247, 11-21-20 "Dominionizing the Vote" 22:00 (PX 32)			
I-1	CLIP 248, 11-21-20 "Dominionizing the Vote" 23:21 (PX 32)			
I-1	CLIP 249, 11-21-20 "Dominionizing the Vote" 25:57 (PX 32)			
I-1	CLIP 250, 11-21-20 "Dominionizing the Vote" 28:58 (PX 32)			
H-1	CLIP 251, 08-09-21 Chanel Rion Depo 22:11-25			
H-1	CLIP 252, 08-09-21 Chanel Rion Depo 34:10-35:4			
H-1	CLIP 253, 08-09-21 Chanel Rion Depo 40:7-41:5			
H-1	CLIP 254, 08-09-21 Chanel Rion Depo 44:1-11			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
H-1	CLIP 255, 08-09-21 Chanel Rion Depo 49:14-19			
H-1	CLIP 256, 08-09-21 Chanel Rion Depo 74:12-16			
H-1	CLIP 257, 08-09-21 Chanel Rion Depo 77:3-16			
H-1	CLIP 258, 08-09-21 Chanel Rion Depo 79:22-80:17			
H-1	CLIP 259, 08-09-21 Chanel Rion Depo 80:23-81:15			
H-1	CLIP 260, 08-09-21 Chanel Rion Depo 82:18-83:1			
H-1	CLIP 261, 08-09-21 Chanel Rion Depo 84:1-13			
H-1	CLIP 262, 08-09-21 Chanel Rion Depo 88:16-25			
H-1	CLIP 263, 08-09-21 Chanel Rion Depo 89:13-90:20			
H-1	CLIP 264, 08-09-21 Chanel Rion Depo 91:21-93:1			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
H-1	CLIP 265, 08-09-21 Chanel Rion Depo 112:19-25			
H-1	CLIP 266, 08-09-21 Chanel Rion Depo 114:4-9			
H-1	CLIP 267, 08-09-21 Chanel Rion Depo 127:19-128:2			
H-1	CLIP 268, 08-09-21 Chanel Rion Depo 128:8-129:20			
H-1	CLIP 269, 08-09-21 Chanel Rion Depo 131:6-23			
F-1	CLIP 270, Newsmax Retraction Video (PX 30)			
I-1	CLIP 271, OAN "Dominion-izing the Vote" 0:00 (PX 32)			
I-1	CLIP 272, OAN "Dominion-izing the Vote" 20:40 (PX 32)			
B-2	CLIP 273, 09-08-21 Oltmann Depo 22:3-24:3			
B-2	CLIP 274, 09-08-21 Oltmann Depo 75:2-17			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
I-1	CLIP 275, 07-30-21 Herring Depo 27:14-28:5			
<b>DEPOSITION EXCERPTS CONTAINED WITHIN BODY OF PLAINTIFF'S OMNIBUS RESPONSE</b>				
B-2	EXCERPT 09-08-21 Oltmann Depo 15:20-20:18			
B-2	EXCERPT 09-08-21 Oltmann Depo 71:10-72:15			
B-2	EXCERPT 09-08-21 Oltmann Depo 74:23-75:4			
B-2	EXCERPT 09-08-21 Oltmann Depo 75:18-76:3			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 8:25-9:8			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 12:10-12			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 14:2-3			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 17:7-10			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 18:8-19:22			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 22:18-24:23			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 26:5-8			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 28:14-34:10			
D-1	EXCERPT 08-11-21 CD Solutions (Pappas) Depo 39:20-25			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 9:8-10:23			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 14:11-23			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 18:18-19:6			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 19:7-16			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 20:9-21:7			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 35:23-37:14			
D-3	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo 47:24-66:8			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 10:11-11:7			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 12:19-13:4			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 14:3-9			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 16:11-18			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 22:15-22			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 33:6-12			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 62:18-64:11			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 66:19-69:21			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 76:3-80:15			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 65:24-66:18			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 69:20-71:22			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 73:18-25			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 109:9-110:20			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 112:21-113:14			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 14:1-13			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 15:3-21			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 21:10-23:25			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 27:9-29:21			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 57:8-59:11			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 63:12-25			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 66:24-69:5			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 79:4-22			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 14:5-10			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 29:10-14			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 30:10-31:16			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 63:25-65:2			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 66:19-67:6			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 115:2-23			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 10:22-23:6			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 19:19-20:6			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 21:20-22:9			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 27:16-23			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 32:24-34:5			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 38:23-39:23			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 76:2-7			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 86:6-87:6			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 94:4-95:1			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 113:12-23			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 6:15-21			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 27:6-28:3			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 29:22-30:25			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 40:10-44:5			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 44:23-45:25			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 46:14-50:17			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 47:19-55:12			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 58:10-22			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 62:12-63:6			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 65:8-66:4			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 66:13-67:6			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 67:21-68:10			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 71:19-83:20			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 87:15-94:12			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 98:16-99:23			



<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
J-1y	EXCERPT 08-14-21 Rudolph Giuliani Depo 104:9-108:4			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 124:8-125:22			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 134:16-136:20			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 139:14-144:20			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 162:13-163:24			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 168:21-24			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 170:13-24			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 174:12-175:23			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 10:14-12:21			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 13:9-17			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 24:15-27:4			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 44:9-19			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 45:10-25			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 56:7-20			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 61:2-17			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 64:5-65:2			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 74:19-22			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 82:8-15			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 98:21-99:4			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell, P.C. Depo 104:21-107:10			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 20:19-24			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 25:6-20			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 27:5-11			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 38:10-16			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 44:8-10			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 46:20-47:15			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 54:22-55:23			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. 62:19-63:24			
M-2	EXCERPT 08-13-21 Donald J. Trump for President, Inc. 37:4-24			
M-2	EXCERPT 08-13-21 Donald J. Trump for President, Inc. 58:12-15			
M-2	EXCERPT 08-13-21 Donald J. Trump for President, Inc. 73:1-7			
M-2	EXCERPT 08-13-21 Donald J. Trump for President, Inc. 74:19-75:6			
<b>DEPOSITION EXCERPTS NOT SPECIFICALLY CITED BUT ATTACHED TO PLAINTIFF'S OMINBUS RESPONSE</b>				
B-2	EXCERPT 09-08-21 Oltmann Depo 47:2-48:17			
B-2	EXCERPT 09-08-21 Oltmann Depo 63:9-65:7			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
B-2	EXCERPT 09-08-21 Oltmann Depo 90:1-25			
B-2	EXCERPT 09-08-21 Oltmann Depo 93:18-96:21			
C-1	EXCERPT 08-11-21 FEC United (Butler) Depo 43:2-44:3			
C-1	EXCERPT 08-11-21 FEC United (Butler) Depo 44:13-46:2			
C-2	EXCERPT 09-09-21 FEC United (Oltmann) Depo 30:2-31:11			
D-1	EXCERPT 08-11-21 CD Solutions (Pappas) Depo 30:5-19			
D-1	EXCERPT 08-11-21 CD Solutions (Pappas) Depo 36:24-38:4			
D-1	EXCERPT 08-11-21 CD Solutions (Pappas) Depo 43:14-44:3			
D-2	EXCERPT 09-09-21 Shuffling Madness Media (Oltmann) Depo			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 11:3-7			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 34:13-17			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 50:18-51:10			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 51:23-52:10			
E-1	EXCERPT 08-10-21 James Hoft/TGP Communications dba The Gateway Pundit Depo 97:16-25			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 10:24-12:13			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 38:13-39:18			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 58:1-60:22			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 63:22-64:18			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 82:7-10			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 82:11-25			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 99:25-100:6			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 101:24-102:21			
F-1	EXCERPT 07-27-21 Michelle Malkin Depo 109:2-9			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 17:8-20			
G-1	EXCERPT 08-13-21 Eric Metaxas Depo 77:11-79:2			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 94:9-99:10			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
H-1	EXCERPT 08-09-21 Chanel Rion Depo 102:16-105:6			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 115:24-116:14			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 125:2-12			
H-1	EXCERPT 08-09-21 Chanel Rion Depo 132:3-133:8			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 47:19-48:7			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 49:4-20			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 51:19-52:2			



Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 54:7-55:16			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 56:16-57:2			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 61:22-62:20			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 94:4-95:1			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 97:10-20			
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 104:10-13			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
I-1	EXCERPT 07-30-21 Charles Herring/Herring Networks, Inc. dba One America News Network Depo 113:12-114:3			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 45:10-46:2			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 95:22-96:15			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 123:25-125:14			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 145:21-147:23			
J-1	EXCERPT 08-14-21 Rudolph Giuliani Depo 167:25-168:10			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 10:14-22			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 13:16-17			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 24:15-27:4			

Exhibit No. <sup>1</sup>	Description or Video/Audio CLIP or Depo Page/Line Reference	State if No Objection to Admitting into Evidence	Defendant's Objections	Plaintiff's Response as to Why Admissible
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 47:6-48:11			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 59:21-60:1			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 63:13-64:21			
K-1	EXCERPT 07-20-21 Sidney Powell/Sidney Powell P.C. Depo 100:14-102:6			
L-1	EXCERPT 08-04-21 Defending the Republic Depo 25:15-19			
L-1	EXCERPT 08-04-21 Defending the Republic Depo 41:2-16			
L-1	EXCERPT 08-04-21 Defending the Republic Depo 55:13-56:18			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. Depo 48:14-49:15			
M-1	EXCERPT 08-09-21 Donald J. Trump for President, Inc. Depo 74:16-75:3			

<b>Exhibit No.<sup>1</sup></b>	<b>Description or Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection to Admitting into Evidence</b>	<b>Defendant's Objections</b>	<b>Plaintiff's Response as to Why Admissible</b>
M-1	EXCERPT 08-13-21 Donald J. Trump for President, Inc. Depo 12:7-16			

Plaintiff reserves the right to cite to or rely upon any evidence submitted by Defendants in their motions or reply briefs.

Respectfully submitted this 29th day of October 2021.

/s/ Charles J. Cain

Charles J. Cain, No. 51020

[ccain@cstrial.com](mailto:ccain@cstrial.com)

Steve Skarnulis, No. 21PHV6401

[skarnulis@cstrial.com](mailto:skarnulis@cstrial.com)

Bradley A. Kloewer, No. 50565

[bkloewer@cstrial.com](mailto:bkloewer@cstrial.com)

Zachary H. Bowman, No. 21PHV6676

[zbowman@cstrial.com](mailto:zbowman@cstrial.com)

Thomas M. Rogers III, No. 28809

[trey@rklawpc.com](mailto:trey@rklawpc.com)

Mark Grueskin, No. 14621

[mark@rklawpc.com](mailto:mark@rklawpc.com)

Andrew E. Ho, No. 40381

[andrew@rklawpc.com](mailto:andrew@rklawpc.com)

**ATTORNEYS FOR PLAINTIFF**

### **CERTIFICATE OF SERVICE**

I certify that true and accurate copy of the foregoing Plaintiff's Chart of Exhibits has been e-served via ICCES on all counsel of record on the 29th day of October 2021.

/s/ Charles J. Cain

Charles J. Cain, No. 51020