

DISTRICT COURT, CITY AND COUNTY OF DENVER, COLORADO 1437 Bannock Street Denver, Colorado 80202 Phone Number: (720) 865-8301	DATE FILED: November 13, 2021 6:09 PM FILING ID: F5E188762A047 CASE NUMBER: 2020CV34319
ERIC COOMER, Ph.D., Plaintiff  Vs.  DONALD J. TRUMP FOR PRESIDENT, INC., et al., Defendants.	▲ COURT USE ONLY ▲
Michael W. Reagor, No. 22027 Christopher P. Seerveld, No. 17985 Dymond ● Reagor, PLLC 8400 E. Prentice Ave., Suite 1040 Greenwood Village, Colorado 80111 Phone: (303) 734-3400; Fax: (866) 861-7066 <a href="mailto:mreagor@drc-law.com">mreagor@drc-law.com</a> ; <a href="mailto:cseerveld@drc-law.com">cseerveld@drc-law.com</a> Attorneys for Defending the Republic, Inc.	Case Number: 2020CV34319  Courtroom 409
<b>DEFENDING THE REPUBLIC, INC.'S NOTICE OF          OBJECTIONS TO PLAINTIFF'S ANTI-SLAPP HEARING EXHIBITS</b>	

Defendant Defending the Republic, Inc. (hereinafter "DTR") by and through counsel of record, hereby provides its objections to anti-SLAPP hearing Exhibits:

DTR did not exist at the time the statements in this matter were made. DTR must be dismissed from this suit immediately. DTR files these objections in compliance with the court's order. Specifically, DTR incorporates by reference the objections and grounds for objection to exhibits set forth in Defendant Sidney Powell's objections and Defendant Herring Networks, Inc., d/b/a One America News Network, and Chanel Rion's objections, as applicable to and as if the Powell Defendants' and DTR were substituted in the objection for the OAN Defendants, e.g. "C.R.E. 401/402/403 - No relevance to Dr. Coomer's burden of producing clear and convincing

evidence that [the Powell Defendants or DTR] exhibited...,” etc. DTR objects to all of the expert declarations under C.R.E. 702, 704 and 705. DTR adds the following objections:

**Chart of Exhibits – Plaintiff Eric Coomer’s Alleged Evidence**

<b>Exhibit No.</b>	<b>Description of Video/Audio CLIP or Depo Page/Line Reference</b>	<b>State if No Objection</b>	<b>Defendant’s Objections</b>	<b>Plaintiff’s Response as to Why Admissible</b>
A	Declaration of Eric Coomer “I am aware that Defendant Defending the Republic, Inc. (DTR) is closely tied to Defendants Sidney Powell and Sidney Powell, P.C. Sidney Powell is a director of DTR, which shares a mailing address with Sidney Powell, P.C.” (¶ 33, Line 1.)		C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the Powell Defendants made any defamatory statements after DTR came into existence on Dec 1, 2020 and began operations (hereinafter “ <b>Date of Formation Relevance</b> ”).	
A	Declaration of Eric Coomer “Powell began promoting DTR prior to the November 19 press conference.” (¶ 33, Line 2.)		Date of Formation Relevance.	
A	Declaration of Eric Coomer “The ‘Of Counsel’ attorneys employed by her firm have signed the pleadings of DTR in at least two cases, including Powell’s election litigation in Georgia, <i>Pearson v. Kemp</i> , No. 1:20-cv-04809 (N.D. Ga. Dec. 1, 2020) and in Texas, <i>Gohmert v. Pence</i> No. 6:20-cv-00660 (E.D. Tex. Dec. 27, 2020).” (¶ 33, Line 4.)		Date of Formation Relevance.	

K-1	PX 14 12-23-20 video: Coomer contradictions by <a href="http://defendingtherepublic.org">defendingtherepublic.org</a>		Date of Formation Relevance.	
K-5 KKK	11-26-20 Defending the Republic solicitation webpage		C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the Powell Defendants or DTR exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the Powell Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice. Date of Formation Relevance. C.R.E. 901 – Lack of authentication.	
L-1	PX 48 11-14-20 Fox News: Sidney Powell		Date of Formation Relevance.	
L-1 MMM	PX 51 11-14-20 Lou Dobbs: Interview with Sidney Powell; Dominion Denies Claims About Software Issues; Multiple Reports Seem to Show Otherwise.		Date of Formation Relevance.	
L-1 LLL	PX 55 Links re videos & posting on DTR website		Date of Formation Relevance	
Q	Heidi Beedle Declaration “I was never contacted by any of the other Defendants in this		C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of	

	<p>case to confirm whether or not I am actually affiliated with Our Revolution or Antifa, or if I was a participant on the alleged "Antifa call" or had any knowledge or information about such a call. Specifically, I have never been contacted by Donald J. Trump for President, Inc., Rudolph Giuliani, Sidney Powell, Sidney Powell P.C., Defending the Republic, Inc., FEC United, Shuffling Madness Media, Inc. dba Conservative Daily, James Hoft, TGP Communications LLC dba The Gateway Pundit, Michelle Malkin, Eric Metaxas, Chanel Rion, or Herring Networks, Inc. dba One America News Network.” (§18.)</p>		<p>producing clear and convincing admissible evidence that the Powell Defendants or DTR exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the Powell Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice.</p>	
L-1	CLIP 18, 08-04-21 Defending the Republic Depo 14:11-19		Date of Formation Relevance.	
L-1	CLIP 21, 08-04-21 Defending the Republic Depo 29:14-30:15		Date of Formation Relevance.	
L-1	CLIP 22, 08-04-21 Defending the Republic Depo 33:9-24		Date of Formation Relevance.	
L-1	CLIP 23, 08-04-21 Defending the Republic Depo 34:18-25		Date of Formation Relevance.	
L-1	CLIP 24, 08-04-21 Defending the Republic Depo 56:11-18		Date of Formation Relevance.	
L-1	CLIP 25, 08-04-21 Defending the Republic Depo 57:6-24		Date of Formation Relevance.	
L-1	CLIP 26, 08-04-21 Defending the Republic Depo 63:16-24		Date of Formation Relevance.	
L-1	EXCERPT 08-04-21 Defending the Republic Depo 25:15-19		Date of Formation Relevance.	
L-1	EXCERPT 08-04-21 Defending the Republic Depo		Date of Formation Relevance.	

	41:2-16			
L-1	EXCERPT Defending the Republic Depo 55:13-56:18	08-04-21	C Date of Formation Relevance.	

Respectfully submitted,

By: /s/ Christopher P. Seerveld  
Michael W. Reagor  
Christopher P. Seerveld  
Attorneys for Defending the Republic

CERTIFICATE OF SERVICE

The undersigned certifies that on November 13, 2021, a true and correct copy of the foregoing was served via the Colorado Courts e-filing system on all counsel of record.

/s/ Christopher P. Seerveld  
Christopher P. Seerveld