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Exhibit E

<u>NO.</u>	<u>DESCRIPTION</u>	<u>DEFENDANTS' OBJECTIONS</u>	<u>FURTHER EXPLANATION</u>
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	C.R.E. 401/402/403 – No relevance to Dr. Coomer's burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants "of and concerning" Dr. Coomer; any probative value outweighed by undue prejudice C.R.E. 801 – Hearsay to the extent that the content is offered for the truth of the matters asserted therein C.R.E. 901 – Lack of authentication	Dr. Coomer has not alleged, nor could he allege, that the OAN Defendants have made any statements suggesting that Dr. Coomer engaged in computer fraud in the 2020 election, so this statement is irrelevant to the three defamatory statements at issue. But the statement is unduly prejudicial because of how it may taint the OAN Defendants in the eyes of the trier of fact. Moreover, even if this evidence were relevant, it is unauthenticated hearsay offered for the truth of those statements. This article has not been authenticated and there has been no opportunity to cross-examine these purported experts.
H-1	PX 60 Series of tweets by Ron@CodeMonkeyZ	C.R.E. 401/402/403 – No relevance to Dr. Coomer's burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants "of and concerning" Dr. Coomer; any probative value outweighed by undue prejudice C.R.E. 801 – Hearsay to the extent that the content is offered	The Tweets sent by Ron Watkins (@CodeMonkeyZ) have no relevance to the three allegedly defamatory statements made by the OAN Defendants of and concerning Dr. Coomer. No statements by Watkins are at issue in this case, and this evidence is therefore irrelevant. But Dr. Coomer is attempting to introduce evidence related to a controversial figure to unfairly prejudice the OAN Defendants by association. Moreover, to the extent these Tweets are being presented for the truth of the matter asserted,

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		for the truth of the matters asserted therein C.R.E. 901 – Lack of authentication	they are unauthenticated hearsay that is not proper evidence for consideration.
H-1	PX 61 11-17-20 Dominion Voting Systems webpage: Setting the Record Straight: Facts & Rumors	C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice C.R.E. 801 – Hearsay to the extent that the content is offered for the truth of the matters asserted therein C.R.E. 901 – Lack of authentication	Dr. Coomer has not alleged, nor could he allege, that statements made by the OAN Defendants about Dominion Voting Systems are defamatory as to Dr. Coomer. Thus, any statements by Dominion purporting to “set the record straight” have no relevance to the defamatory statements at issue of and concerning Dr. Coomer. Moreover, even if this evidence were relevant, it is unauthenticated hearsay pulled from a Web site, offered for the truth of those statements. Web pages are not self-authenticating, and if the information on the site is relevant in some way to Dr. Coomer’s claims, he needs to present a witness who can authenticate the information on the Web page.
I-1	PX 41 12-22-20 text message from C Herring to ?? re can we counter sue Coomer	C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory	The fact that Charles Herring may have sent a text message to an unknown person to discuss the potential options for a countersuit against Dr. Coomer has no relevance to the statements at issue, which were made <i>before</i> the text message. Given the timing, the text message cannot be

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		<p>statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice</p> <p>C.R.E. 901 – Lack of authentication</p>	<p>evidence of Herring’s mental state at the time the allegedly defamatory statements were made. And the evidence is unfairly prejudicial because it suggests a motive for the allegedly defamatory statements in November 2020 that could not have existed at the time they were made.</p> <p>Moreover, the text messages are not adequately authenticated.</p>
I-1	PX 44 03-11-21 text between Charles Herring and Christina Bobb	<p>C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice</p> <p>C.R.E. 901 – Lack of authentication</p>	<p>Text messages between Charles Herring and Christina Bobb have no relevance to the statements at issue, which were made <i>before</i> the text messages. Given the timing, the text messages cannot be evidence of OAN’s mental state at the time the allegedly defamatory statements were made, and nothing in the string is otherwise probative on the elements of Dr. Coomer’s claims. And the evidence is unfairly prejudicial because it suggests some sort of connection between the statements and Giuliani.</p> <p>Moreover, the text messages are not adequately authenticated.</p>
I-1	PX 45 05-03-21 email chain regarding Newsmax retraction and	C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the OAN Defendants	The email chain at issue here has no relevance to the allegedly defamatory statements at issue, which were made <i>before</i> the emails.

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	boycott of Newsmax	<p>exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice</p> <p>C.R.E. 407 – inadmissible subsequent remedial measure</p> <p>C.R.E. 408 – inadmissible compromise or offer to compromise</p> <p>C.R.E. 901 – Lack of authentication</p>	<p>Given the timing, the email string cannot be evidence of OAN’s state of mind at the time the allegedly defamatory statements were made. And the evidence is unfairly prejudicial because it suggests a motive for the allegedly defamatory statements that could not have existed at the time they were made.</p> <p>Moreover, the Newsmax retraction and any related evidence should be inadmissible as a subsequent remedial measure and/or a compromise after the lawsuit was filed.</p> <p>Regardless, the email chain is not sufficiently authenticated.</p>
N	<p>Declaration of Frederick W. Brown Jr.</p> <p>“It is my opinion that the defendants in this case, Coomer v. Trump, either were ignorant of, disdainful of, or paid almost no attention to, the basic moral standards upon which responsible journalism is based.”</p> <p>(¶ 8, Line 1.)</p>	<p>C.R.E. 403 – Unduly prejudicial and cumulative to group OAN Defendants with other defendants without specifying basis for conclusion</p> <p>C.R.E. 602 – Lack of foundation; no personal knowledge about OAN Defendants’ conduct</p> <p>C.R.E. 704 – Improper expert testimony about whether legal standard has been met</p>	<p>This is an example of numerous statements in Dr. Coomer’s purported expert declarations where all defendants are lumped together, with no effort to distinguish them from one another, even though they engaged in materially different actions. For this reason alone, this statement should be inadmissible under C.R.E. 403.</p> <p>Moreover, Brown’s declaration demonstrates that he has no personal knowledge of the efforts undertaken by the OAN Defendants to report on Dr. Coomer, much less their “moral standards.”</p>

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			<p>Brown simply has no basis to assert this opinion.</p> <p>Finally, this opinion is inappropriate in any event because it purports to provide expert testimony on whether the ultimate legal standard has been met, which is inadmissible under C.R.E. 704.</p>
N	<p>Declaration of Frederick W. Brown Jr.</p> <p>“They did not double-check what they purported to have heard, nor did they adequately pursue explanations from those they were accusing of misbehavior.” (¶ 8, Line 3.)</p>	<p>C.R.E. 403 – Unduly prejudicial and cumulative to group OAN Defendants with other defendants without specifying basis for conclusion</p> <p>C.R.E. 602 – Lack of foundation; no personal knowledge about OAN Defendants’ conduct</p> <p>C.R.E. 704 – Improper expert testimony about whether legal standard has been met</p>	<p>This statement suffers the same fatal flaws as the previous statement. Brown lumps all of the defendants together and concludes that they did not adequately report the articles at issue, even though he has no personal knowledge whatsoever about what was done. And even if Brown had a basis to reach this conclusion, it is improper expert testimony on the ultimate legal standard.</p>
O	<p>Declaration of J. Alex Halderman</p> <p>“Election security experts and public officials have reiterated this countless times, beginning shortly after the election, yet Defendants ignored these authorities and instead advanced baseless conspiracy theories.”</p>	<p>C.R.E. 401/402/403 – No relevance to Dr. Coomer’s burden of producing clear and convincing admissible evidence that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice (to suggest that the defendants acted in unison as a</p>	<p>Once again, Dr. Coomer has not alleged, nor could he allege, that the OAN Defendants have made any statements suggesting that Dr. Coomer “rigged” the 2020 election, so this statement is irrelevant to the three defamatory statements at issue. And the statement is unduly prejudicial because of how it may taint the OAN Defendants in the eyes of the trier of fact.</p> <p>Moreover, this statement improperly impugns the</p>

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	(¶ 7, Lines 2-5.)	<p>monolith is unfounded, unsupported, and unduly prejudicial)</p> <p>C.R.E. 404(a) – Improper testimony about whether the OAN Defendants are telling the truth on a particular occasion</p> <p>C.R.E. 602 – Lack of foundation/no personal knowledge about the OAN Defendants or Dr. Coomer's conduct or state of mind or about all “election security experts and public officials” findings</p> <p>C.R.E. 704 – Improper expert testimony about whether legal standard has been met (on ultimate issues of falsity and actual malice)</p> <p>C.R.E. 801 – Hearsay to the extent that the election security experts and public officials' statements are offered for the truth of the matters asserted</p> <p>C.R.E. 901 – Lack of authentication about other election security expert and public officials' research and findings</p>	<p>character of the OAN Defendants under C.R.E. 404, even though Dr. Halderman has no personal knowledge about what they may have “ignored” or how they decided to proceed with their coverage. It is also improper expert testimony that goes to the ultimate issue of actual malice.</p> <p>But even if this statement were relevant and appropriate, it is inadmissible, unauthenticated hearsay because Dr. Halderman is quoting unnamed “election security experts and public officials” to establish the truth of their out-of-court statements.</p>
O	Declaration of J. Alex Halderman “Leaving no doubt about our view of the credibility of claims such as those advanced by	<p>C.R.E. 106 – Failure to produce complete letter and article</p> <p>C.R.E. 401/402/403 – No relevance to Dr. Coomer's burden of producing clear and convincing admissible evidence</p>	Rather than stating his own opinion in a manner that would be admissible, Dr. Halderman partially quotes a statement that he and unnamed “other leading security experts” made without

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	<p>Defendants, we stated: We are aware of alarming assertions being made that the 2020 election was ‘rigged’ by exploiting technical vulnerabilities. However, in every case of which we are aware, these claims either have been unsubstantiated or are technically incoherent.” (¶ 15, Lines 1-6.)</p>	<p>that the OAN Defendants exhibited knowing falsity or reckless disregard for the truth (subjective awareness of probable falsity) with the allegedly defamatory statements made by the OAN Defendants “of and concerning” Dr. Coomer; any probative value outweighed by undue prejudice</p> <p>C.R.E. 404(a) – Improper testimony about whether the OAN Defendants are telling the truth on a particular occasion</p> <p>C.R.E. 602 – Lack of foundation/no personal knowledge about other election security specialists’ research and findings or about the OAN Defendants’ conduct or state of mind</p> <p>C.R.E. 704 – Improper expert testimony about whether legal standard has been met (on ultimate issues of falsity and actual malice)</p> <p>C.R.E. 801 – Hearsay as to the out-of-court statements made by Halderman and “other leading security experts” to the extent they are offered for the truth of the matters asserted</p> <p>C.R.E. 901 – Lack of authentication about other election security specialists’ research and findings</p>	<p>providing the full statement or identifying the individuals. Accordingly, this statement is inadmissible under C.R.E. 106 and it is also inadmissible, unauthenticated hearsay to the extent Dr. Halderman is relying on the truth of the matter asserted out-of-court by unnamed individuals. The article itself would be the best evidence of this statement.</p> <p>Regardless, this statement is irrelevant because Dr. Coomer has not alleged, nor could he allege, that the OAN Defendants have made any statements suggesting that Dr. Coomer “rigged” the 2020 election, so this statement is irrelevant to the three defamatory statements at issue. And the statement is unduly prejudicial because of how it may taint the OAN Defendants in the eyes of the trier of fact.</p>

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		C.R.E. 1002 – Failure to produce full article and letter as best evidence	