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ADAMS COUNTY
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2025 JUL -9 AM 9:28

COURT OF COMMON PLEAS
ADAMS COUNTY, OHIO

Larry Heller
CLERK

SHAWN COOLEY ET AL

PLAINTIFFS,

VS.

JOSEPH EDGAR FOREMAN ET AL

DEFENDANTS,

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CASE NO. CVH 2023-0069

**NOTICE OF DEPOSITION OF
PLAINTIFFS**

Please take notice that the Defendant's, Joseph E. Foreman and Hungry Husler Records, by and through counsel, will take the deposition upon oral testimony of the following people, to wit:

- 1.) Shawn D. Cooley,
- 2.) Justin Cooley,
- 3.) Michael Estep,
- 4.) Shawn Grooms,
- 5.) Brian Newland,
- 6.) Lisa Phillips,
- 7.) Randolph Walters.

on **Wednesday, August 6, 2025**, and **Friday, August 8, 2025** at the Law Offices of Dr. David Osborne, Jr., LLC, 115 West Main Street, West Union, Ohio 45693, beginning at **9:00 a.m.** The Deposition will be recorded by stenography and/or videotaped. The Deposition will continue in progress from day-to-day until completed. All counsel are

invited to attend and question the witnesses.

Respectfully submitted,

Law Offices of Dr. David Osborne, Jr., LLC

/s/ David Osborne, Jr./s/
DAVID S. OSBORNE, JR., #0096879
Attorney for Plaintiffs
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PROOF OF SERVICE

The undersigned hereby certifies that a true copy of the foregoing was served upon to following:

1. **Robert A. Klinger**, Robert A. Klinger Co., LPA, 895 Central Ave. Ste. 300, Cincinnati, Ohio 45202;
2. **Arthur West**, 120 State Ave. NE, #1497, Olympia, WA 98501;
3. **David J. Caray**, ACLU of Ohio Foundation, 4506 Chester Ave., Cleveland, Ohio 44102;
4. **Amy R. Gilbert**, ACLU of Ohio Foundation, 4506 Chester Ave., Cleveland, Ohio 44102;
5. **Freda J. Levenson**, ACLU of Ohio Foundation, 4506 Chester Ave., Cleveland, Ohio 44102;
6. **Vera Eidelman**, American Civil Liberties Union Foundation, 125 Broad Street, 18th Floor, New York, NY 10004;
7. **David Moser**, Fishel Downey Albrecht and Riepenhoff, LLP, 7775 Walton Parkway, Suite 200, New Albany, Ohio 43054.

by regular U.S. mail, hand delivery, email, fax, by dropping off in the Attorney box at Adams County Court, or email this 8 day of July, 2025.

Law Offices of Dr. David Osborne, Jr., LLC

/s/ David Osborne, Jr./s/
DAVID S. OSBORNE, JR., #0096879
Attorney for Plaintiffs