

FILED
ADAMS COUNTY
CLERK OF COURTS

2026 MAR -2 PM 1:47

IN THE COURT OF COMMON PLEAS
CIVIL DIVISION
ADAMS COUNTY, OHIO

Larry Heller
CLERK

SHAWN D. COOLEY, et al.

PLAINTIFFS,

VS.

JOSEPH EDGAR FOREMAN, et al.

DEFENDANTS,

* CASE NO. CVH 2023-0069
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**DEFENDANT JOSEPH EDGAR FOREMAN'S PROPOSED WITNESSES FOR
TRIAL**

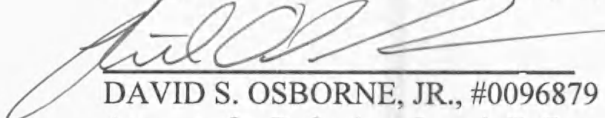
Comes now the Defendant, Joseph Foreman, by and through his Counsel and notifies that the following people are proposed witnesses for the Defense at the upcoming jury trial, to wit:

- 1.) Joseph Foreman;
- 2.) Shawn Cooley (as if on cross);
- 3.) Justin Cooley (as if on cross);
- 4.) Randy Walters (as if on cross);
- 5.) Mike Estep (as if on cross);
- 6.) Brian Newland (as if on cross);
- 7.) Carly Patterson;
- 8.) Dorothy Chandler;
- 9.) Tabitha Spires;
- 10.) Shawn Grooms (as if on cross);

- 11.) Natasha Purdin;
- 12.) Rhonda Grooms (AKA Rhonda Huffman);
- 13.) Lisa Phillips (as if on cross);
- 14.) Angela Foreman;
- 15.) Records Custodian for the Adams County Sherriff's Office or any other ACSO employee for authentication of ACSO records and documents;
- 16.) Any witness called by the Plaintiff in their case in chief;
- 17.) The Defendant reserves the right to supplement this list.

Respectfully submitted,

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



DAVID S. OSBORNE, JR., #0096879

Attorney for Defendant Joesph E. Foreman

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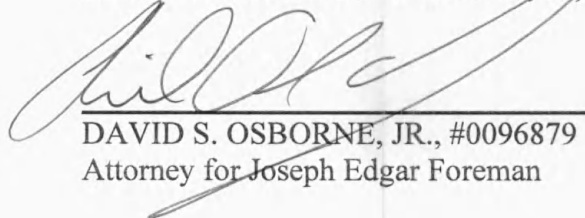
TO THE COURT

The undersigned hereby certifies that he did not use the Artificial Intelligence program by Lexis Nexis.

No legal research was completed using the AI program.

Respectfully submitted,

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



DAVID S. OSBORNE, JR., #0096879

Attorney for Joseph Edgar Foreman

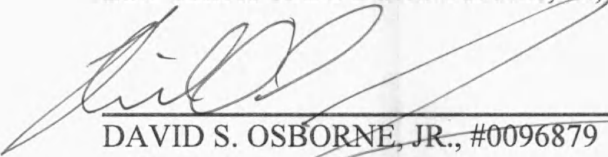
PROOF OF SERVICE

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. **Daniel Downey and Sara Lindsey McElroy**, 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 2 day of March, 2026.

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



DAVID S. OSBORNE, JR., #0096879
Attorney for Joseph Edgar Foreman
