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

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 AMENDED WITNESS AND
EXHIBIT LIST FOR TRIAL**

Comes now the Defendant, Joseph Foreman, by and through his Counsel and notifies this honorable court that the following are his amended proposed witness list for the Defense at the upcoming jury trial, to wit:

- 1.) Joseph E. Foreman;
- 2.) Shawn Cooley (As if on Cross Examination);
- 3.) Justin Cooley (As if on Cross Examination);
- 4.) Mike Estep (As if on Cross Examination);
- 5.) Shawn Grooms (As if on Cross Examination);
- 6.) Randy Walters, Jr. (As if on Cross Examination);
- 7.) Lisa Phillips (as if on cross examination);
- 8.) Brian Newland (as if on cross examination);
- 9.) Stephanie Chambers;

- 10.) Angela Foreman;
- 11.) Sherriff Kenny Dick;
- 12.) Rhonda Grooms;
- 13.) Dorothy Chambers;
- 14.) Tabitha Spires;
- 15.) Natahsa Purdin;
- 16.) Any witness identified by the Plaintiff's;
- 17.) Any witness previously identified by the Plaintiff's;
- 18.) Defendant reserves the right to supplement this witness list.

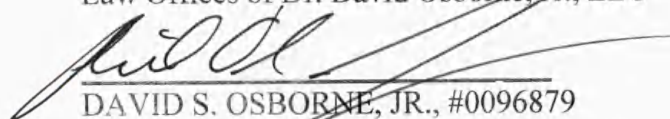
Defendant, Joseph Foreman, by and through his Counsel and notifies this honorable court that the following are his amended proposed exhibit list for the Defense at the upcoming jury trial, to wit:

- 1.) Search warrant for Mr. Foreman's residence;
- 2.) Return on the search warrant for Mr. Foreman's residence;
- 3.) Policies and Procedures for the Adams County Sherriff's Office;
- 4.) Music Video/Song "Lemon Pound Cake";
- 5.) Adams County Sherriff's Office Officer Body Camera Footage for the search of Mr. Foreman's residence;
- 6.) Security footage of the search of Mr. Foreman's residence;
- 7.) Deposition of Shawn Cooley;
- 8.) Deposition of Justin Cooley;
- 9.) Deposition of Brian Newland;
- 10.) Deposition of Shwan Grooms;

- 11.) Deposition of Lisa Phillips;
- 12.) Deposition of Randy Walters, Jr.;
- 13.) 03/26/2023 TikTok Post;
- 14.) 4/6/2023 Instagram Post;
- 15.) 4/7/2023 Instagram Post;
- 16.) 3/22/2023 Instagram Post;
- 17.) 9/19/2022 Instagram Post;
- 18.) 9/21/2022 Instagram Post;
- 19.) Any exhibit disclosed by the Plaintiff in their case in chief;
- 20.) Any exhibit disclosed by the Plaintiff in discovery;
- 21.) The Defendant reserved the right to supplement this list.

Respectfully submitted,

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



DAVID S. OSBORNE, JR., #0096879

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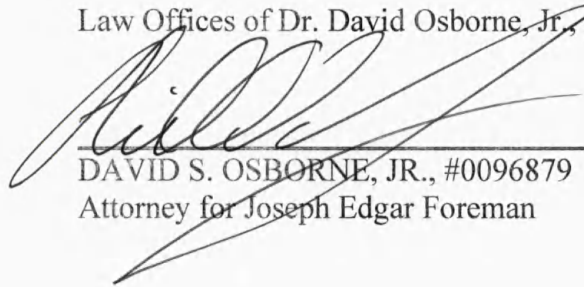
TO THE COURT

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

Legal research was not 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

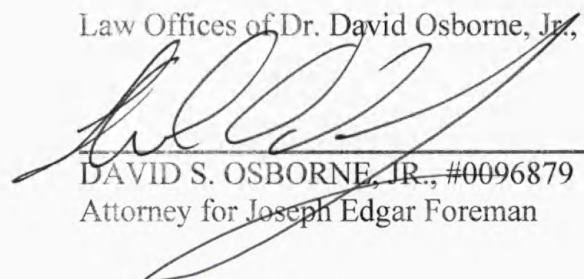
PROOF OF SERVICE

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 _12_ day of _March_, 2026.

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



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