

FILED
ADAMS COUNTY
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Laura 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 PROPOSED EXHIBITS FOR TRIAL

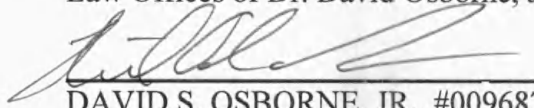
Comes now the Defendant, Joseph Foreman, by and through his Counsel and notifies that the following people are proposed exhibits for the Defense at the upcoming jury trial, to wit:

- 1.) Search Warrant for the residence of Mr. Foreman;
- 2.) Return on the Search Warrant for the residence of Mr. Foreman;
- 3.) Policies and Procedures for the Adams County Sheriff's Office;
- 4.) Music Video: Will you help me repair my door?;
- 5.) Music Video: Lemon Pound Cake;
- 6.) Deposition of Shawn Cooley;
- 7.) ACSO Officer Body Camera Footage of the Search of Mr. Foreman's residence;
- 8.) Security Footage of the execution of the Search Warrant for Mr. Foreman's residence;
- 9.) Trinity White Knights Flyer;
- 10.) Deposition of Justin Cooley;
- 11.) Deposition of Mike Estep;

- 12.) Deposition of Brain Newland;
- 13.) Deposition of Shawn Grooms;
- 14.) Deposition of Lisa Phillips;
- 15.) Deposition of Randy Walters;
- 16.) Any exhibit disclosed by the Plaintiff in their case in chief;
- 17.) Any exhibit disclosed by the Plaintiff in discovery;
- 18.) The Defendant reserves 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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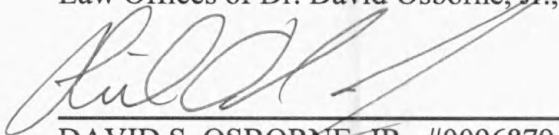
TO THE COURT

The undersigned hereby certifies that he 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

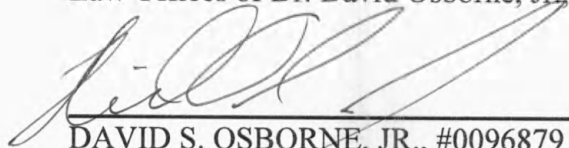
PROOF OF SERVICE

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