

**IN THE CIRCUIT COURT FOR THE STATE OF TENNESSEE
THIRTIETH JUDICIAL DISTRICT AT MEMPHIS**

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|---|---|-------------------------------------|
| PAMELA MOSES, |) | |
| |) | |
| Plaintiff, |) | Case No. CT-1579-19 |
| |) | Division I |
| v. |) | |
| |) | Judge Felicia Corbin-Johnson |
| MARK GOINS, TRE HARGETT, and |) | Judge Suzanne Cook |
| JONATHAN SKRMETTI, in their official |) | Judge Barry Tidwell |
| capacities, |) | |
| |) | |
| Defendants. |) | |

[Proposed] ORDER

The parties in this matter appeared before the Court on December 13, 2024, to argue Plaintiff's Renewal of her Motion to Compel, which Plaintiff filed on August 8, 2024, in connection with her Motion to Compel filed on April 29, 2024. The Court, having considered the Motion, the Parties' briefing related to the Motion, and the Parties' arguments relating to the Motion presented on December 13, 2024, finds that Plaintiff's Motion should be **GRANTED**.

Therefore, the Court **ORDERS** as follows:

Defendants Tre Hargett and Mark Goins shall conduct searches for documents responsive to Plaintiff's Requests for Production Nos. 7, 8, 9, 11, 13, 17, and 25, using the search terms that Plaintiff's counsel provided to Defendants' counsel on July 10, 2024, and that is attached as Exhibit 3 to Plaintiff's Renewal of her Motion to Compel.

Defendants Hargett and Goins shall identify and search the appropriate repositories, including but not limited to: (1) the M-Drive and H-Drive of the Secretary of State's Office; and (2) the files of Secretary Hargett, Coordinator of Elections Goins, Jessica Lim, Beth Henry-

Robertson, Zachery Pratt, D.J. Hall, Lena Russomanno, Andrew Dodd, Lou Alsobrooks, Spenser Jones, and Steve Griffey.

Defendants Hargett and Goins shall produce all non-privileged documents that are responsive to the aforementioned Requests for Production by **January 13, 2025**.

Defendants Hargett and Goins shall produce a privilege log in connection with all assertions of privilege that have been asserted heretofore and any additional assertions of privilege made in connection with any supplemental discovery responses served pursuant to this Order.

It is so ORDERED.

JUDGE FELICIA CORBIN-JOHNSON, CHIEF JUDGE

JUDGE SUZANNE COOK

JUDGE BARRY TIDWELL

SUBMITTED FOR ENTRY BY:

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document has been served via email and the Court's electronic filing system on January 17, 2025, as follows:

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