

**IN THE SUPERIOR COURT OF FULTON COUNTY  
STATE OF GEORGIA**

**CAROLINE JEFFORDS, and  
ROBBIN SOTIR,**

**PETITIONERS,**

**v.**

**CIVIL ACTION NO. 2020CV343938**

**FULTON COUNTY, FULTON COUNTY  
BOARD OF REGISTRATION AND  
ELECTIONS, and FULTON COUNTY  
CLERK OF SUPERIOR AND  
MAGISTRATE COURTS,**

**RESPONDENTS.**

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**AFFIDAVIT OF SERVICE**

Personally, appeared before me, an officer duly qualified to administer oaths, JANINE RAHMING, who after being duly sworn, states the following:

1.

Affiant states that JANINE RAHMING, is over 18 years of age, a Citizen of the United States, and not related to the parties herein. The statements made in the affidavit are true and correct and are based on my personal knowledge.

2.

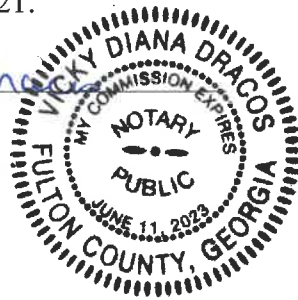
I perfected service RUBY FREEMAN, by placing a SUBPOENA FOR PRODUCTION OF EVIDENCE AT A VIDEOTAPED DEPOSITION, and WITNESS FEE CHECK into the hands of RUBY FREEMAN. Personal description is below. I went to Ms. Freeman's place of ABODE at 5201 Memorial Lane, Powder Springs, GA 30127-3419 on June 3, 2021, at approximately 7:06 p.m. I rang the RING doorbell. Ms. Freeman answered doorbell and communicated via RING and asked me who I was and what I was there for. I told her my name and I was there with a delivery. She asked who it was from and I read the envelope to her. She said

it should be given to her lawyer and asked if I could wait. I waited on the covered front porch where she then came to the door but did not open it. She spoke through the door and told me her lawyer did not answer so she would not be able to accept the envelope. I said okay and thanked her. I left the envelope on the porch slightly under the door mat, took a picture and left the residence.

This being the 7th day of June 2021.

Sworn to and subscribed to before me  
this 7<sup>th</sup> day of June 2021.

Vicky Diana Dracos  
Notary Public



Janine Rahming  
Janine Rahming / Affiant



CIVIL  
SUBPOENA FOR DEPOSITION

Caroline Jeffords, et al.

Case Number: 2020CV343938

Versus

Superior Court  
Fulton County, Georgia

Fulton County, et al

To: Name: Ruby Freeman

Address: 5201 Memorial Lane

Powder Springs, GA 30127-3419

GREETINGS:

You are hereby commanded, that you attend and give testimony at the following date and time: The 11th day of June, 2021 at 10:00 a.m./~~p.m.~~

At the following address and place:

Fulton County Attorney's Office at Government Center 141 Pryor Street, Suite 4038,  
Atlanta GA 30303

Then and there to be examined on deposition for the purpose of discovery and for the preservation of testimony by the Petitioners in the above entitled case, and to bring with you to said deposition the following books, papers, documents and tangible things:

See attached Petitioners' Subpoena for Production of Videotaped Deposition

This deposition shall be recorded by the following means:

Stenographic means;  Sound;  Sound and Visual means.

**HEREIN FAIL NOT, UNDER PENALTY OF LAW**

This the 3rd day of June, 2021.

Signed: 

Print Name: Robert D. Cheeely

Address: 2500 Old Milton Pkwy, Ste 200  
Alpharetta, GA 30009

Phone: ( 770 ) 814 - 7001

Attorney for: Petitioners

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RESPONDENTS.

**SUBPOENA FOR PRODUCTION OF EVIDENCE AT VIDEOTAPED DEPOSITION**

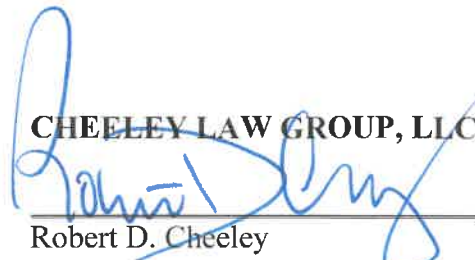
To: Ruby Freeman  
5201 Memorial Lane  
Powder Springs, GA 30127-3419

PLEASE TAKE NOTICE, pursuant to O.C.G.A. §§ 9-11-30 and 9-11-45, that Petitioners will take the deposition upon oral examination of **Ruby Freeman on Friday, June 11**, beginning at **10:00 a.m., Fulton County Attorney's Office at Government Center 141 Pryor Street, Suite 4038, Atlanta GA 30303**, in the presence of an officer duly authorized to administer oaths. Said deposition will be taken by stenographic and videographic means. The witness will be cross-examined for purposes of discovery, for use at trial and for all other purposes allowed under the Georgia Civil Practice Act. The deposition will continue from day to day until said examination is completed. All parties and counsel are invited to attend and examine the witness.

At the time of said deposition, Ruby Freeman is to have in her possession the following:

1. A thumb drive containing separately an electronic bit by bit image of all communications for the time period of January 1, 2020, through December 31, 2020 made and received by Ruby Freeman relating to the November 3, 2020 general election contained on Ruby Freeman's cellphones, emails, tablets, desktop computer or drive, laptops, computers, Snap Chat account, WhatsApp account, Face Book account, Instagram account, You Tube postings or account, other social media communications and any and all other electronic devices and electronic accounts under the custody and control of Ruby Freeman at any time.
2. Bring all electronic devices (including but not limited to cell phones, tablets, thumb drives, laptop computers, desktop computers, in any and all other electronic drives containing electronic stored information) under the custody and control of Ruby Freeman which were utilized during your activities from approximately January 1, 2020, through December 31, 2020.

Submitted this 3rd day of June 2021.

  
**CHEELEY LAW GROUP, LLC**  
Robert D. Cheeley  
GA Bar No. 122727  
2500 Old Milton Parkway, Suite 200  
Alpharetta, GA 30009  
T: (770) 814-7001  
F: (678) 559-0273 **KK**  
[bob@cheeleylawgroup.com](mailto:bob@cheeleylawgroup.com)