

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

CAROLINE JEFFORDS, and
ROBBIN SOTIR,

PETITIONERS,

v.

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

RESPONDENTS.

CIVIL ACTION NO. 2020CV343938

**NOTICE TO TAKE VIDEOTAPED DEPOSITION DUCES TECUM
OF WANDREA SHAYE MOSS**

To: Wandrea Shaye Moss
c/o Cheryl Ringer
141 Pryor Street, Suite 4038
Atlanta, GA 30303

PLEASE TAKE NOTICE, pursuant to O.C.G.A. §§ 9-11-30 AND 24-13-20, *et seq.*, that Petitioners will take the videotaped deposition upon oral examination of **Wandrea Shaye Moss**, on **Thursday, June 10, 2021, 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 examined on deposition for purposes of discovery, and immediately thereafter will be deposed for preservation of testimony 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, Wandrea Shaye Moss 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 Wandrea Shaye Moss relating to the November 3, 2020 general election contained on Wandrea Shaye Moss'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 Wandrea Shaye Moss 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 Wandrea Shaye Moss 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

/s/ Robert D. Cheeley

Robert D. Cheeley

GA Bar No. 122727

2500 Old Milton Parkway, Suite 200
