

4. Attached hereto as **Exhibit 43** is a true and correct audio transcription of a videorecorded statement by Patrick Byrne, dated April 2, 2024, which was accessed and saved from the social media website “rumble” on May 10, 2024.¹ Dominion encourages it be read in a full, but at a minimum see: 30:17-31:7, 32:14-33:2, 34:1-35:7, 44:3-9; 44:14-22.

5. Attached hereto as **Exhibit 44** is a true and correct copy of a spreadsheet detailing, to the best of Dominion’s knowledge, the date, location, and Bates number of Dominion documents provided to Sheriff Dar Leaf by Stefanie Lambert and then released via Sheriff Dar Leaf’s X page between March 8, 2024 and May 13, 2024.

6. Attached hereto as **Exhibit 45** is a true and correct copy of the timeline of some of the public appearances and statements relevant to the leak of Dominion documents at issue in this motion (as stated at the hearing, Dominion doubts it has captured all such occurrences), provided to all parties and the Court at the hearing on March 16, 2024.

7. The following exhibits constitute the public appearances and statements attached to the aforementioned timeline:

- a. Attached hereto as **Exhibit 46** is a true and correct copy of posts to social media during the week of February 11, 2024. Specifically, it is a post by Stefanie Lambert (“@AttyStefLambert”) from the social media website “X” dated February 14, 2024, accessed and saved on March 15, 2024.
- b. Attached hereto as **Exhibit 47** is a true and correct copy of relevant posts to social media during the week of March 3, 2024. Specifically, it is a post from the social media website “X” dated March 9, 2024, with the poster’s name

¹ Available at <https://rumble.com/v4nicb6-explosive-kari-lake-pt-2-supreme-court-case-checkmate-in-two-2-april-2024.html>.

redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”), accessed and saved on March 15, 2024.

c. Attached hereto as **Exhibit 48** is a true and correct copy of relevant posts to social media during the week of March 10, 2024. Specifically, it includes:

- i. a post by the account @Real{EIF from the social media website “X” dated March 11, 2024, accessed and saved on March 14, 2024;
- ii. a post by Patrick Byrne (“@PatrickByrne”) from the social media website “X” dated March 14, 2024, accessed and saved on March 15, 2024;
- iii. a post by Stefanie Lambert (“@AttyStefLambert”) from the social media website “X” dated March 15, 2024, accessed and saved on March 15, 2024;
- iv. the account page from the social media website “X” for the account @SheriffLeaf, accessed and saved on May 14, 2024.

d. Attached hereto as **Exhibit 49** is a true and correct copy of relevant posts to social media and press appearances during the week of March 10, 2024. Specifically, it includes:

- i. a post by the account @SheriffLeaf from the social media website “X” dated March 17, 2024, accessed and saved on March 22, 2024;
- ii. another post by the account @SheriffLeaf from the social media website “X” dated March 17, 2024, accessed and saved on March 22, 2024;
- iii. an additional 37 posts by the account @SheriffLeaf from the social media website “X”, listed in chronological order and dated March 18,

2024 between the hours of 10:22 AM and 12:13 PM, accessed and saved on March 22, 2024;

- iv. a post by Stefanie Lambert (“@AttyStefLambert”) on the social media website “X,” dated March 18, 2024, accessed and saved on March 22, 2024;
- v. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 18, 2024, accessed and saved on March 22, 2024.
- vi. a second post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 18, 2024, accessed and saved on March 22, 2024;
- vii. a third post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 18, 2024, accessed and saved on March 22, 2024;
- viii. a fourth post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 18, 2024, accessed and saved on March 22, 2024;
- ix. a post by Tina Peters (“@realtinapeters”) and reposted by Patrick Byrne (“@PatrickByrne”) on the social media website “X” on March 19, 2024, accessed and saved on March 22, 2024;
- x. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 19, 2024, accessed and saved on March 22, 2024;

- xii. an article from ABC News, *Pro-Trump lawyer arrested on warrant after court hearing in separate case on Dominion leaks*, dated March 19, 2024;
- xiii. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated March 20, 2024, accessed and saved on May 14, 2024;
- xiv. a post from the social media website “X” dated March 22, 2024, with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”), accessed and saved on March 22, 2024;
- xv. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on March 22, 2024, and accessed and saved on March 22, 2024;
- xvi. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on March 22, 2024, and accessed and saved on May 14, 2024;
- xvii. a screenshot of the March 22, 2024 episode of the podcast *Joe Oltmann Live - Guest Stefanie Lambert: What They Did to Stefanie Lambert is Incredible*, available at <https://www.everand.com/listen/podcast/717145119>, accessed and saved on May 15, 2024;
- xviii. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Stefanie Lambert (“@StefLambertEsq”) on March 22, 2024, and accessed and saved on May 14, 2024.

- e. Attached hereto as **Exhibit 50** is a true and correct copy of relevant posts to social media during the week of March 24, 2024. Specifically, it is a post by Patrick Byrne (“@PatrickByrne”) from the social media website “X” dated March 26, 2024, accessed and saved on May 14, 2024.
- f. Attached hereto as **Exhibit 51** is a true and correct copy of relevant posts to social media during the week of March 10, 2024. Specifically, it includes:
 - i. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated April 2, 2024, accessed and saved on May 14, 2024;
 - ii. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated April 3, 2024, accessed and saved on May 14, 2024;
 - iii. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated April 6, 2024, accessed and saved on May 14, 2024.
- g. Attached hereto as **Exhibit 52** is a true and correct copy of relevant posts to social media and press appearances during the week of April 7, 2024. Specifically, it includes:
 - i. a screenshot of the April 7, 2024 episode of the podcast *The Joe Hoft Show - Surviving Attacks for Standing Up for Fair Elections with Stefanie Lambert*, available at <https://frankspeech.com/Video/surviving-attacks-for-standing-up-for-fair-elections-with-stefanie-lambert>, accessed and saved on May 15, 2024;
 - ii. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on

April 8, 2024, and accessed and saved on May 15, 2024, along with the full post that was re-shared by Byrne, also accessed and saved on May 15, 2024;

iii. a post by the account @SheriffLeaf from the social media website “X” dated April 11, 2024, accessed and saved on May 15, 2024.

h. Attached hereto as **Exhibit 53** is a true and correct copy of relevant posts to social media during the week of April 14, 2024. Specifically, it includes:

i. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 14, 2024, and accessed and saved on May 14, 2024;

ii. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 16, 2024, and accessed and saved on May 14, 2024;

iii. another post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 16, 2024, and accessed and saved on May 14, 2024;

iv. a post by Mike Lindell (“@realMikeLindell”) on the social media website “X” dated April 17, 2024, accessed and saved on May 14, 2024;

v. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated April 17, 2024, accessed and saved on May 14, 2024;

vi. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 17, 2024, and accessed and saved on May 14, 2024;

- vii. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 20, 2024, and accessed and saved on May 14, 2024, along with the full post that was re-shared by Byrne, also accessed and saved on May 14, 2024.
- i. Attached hereto as **Exhibit 54** is a true and correct copy of relevant posts to social media during the week of April 21, 2024. Specifically, it is a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on April 24, 2024, and accessed and saved on May 14, 2024.
- j. Attached hereto as **Exhibit 55** is a true and correct copy of relevant posts to social media during the week of May 5, 2024. Specifically, it includes:
 - i. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 7, 2024, and accessed and saved on May 14, 2024;
 - ii. another post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 7, 2024, and accessed and saved on May 14, 2024;
 - iii. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 8, 2024, and accessed and saved on May 14, 2024;

- iv. a second post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 8, 2024, and accessed and saved on May 14, 2024;
- v. a third post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 8, 2024, and accessed and saved on May 14, 2024;
- vi. a fourth post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 8, 2024, and accessed and saved on May 14, 2024;
- vii. a post by Patrick Byrne (“@PatrickByrne”) on the social media website “X” dated May 8, 2024, accessed and saved on May 14, 2024;
- viii. a post by Stefanie Lambert (“@StefLambertEsq”) on the social media website “X” dated May 8, 2024, accessed and saved on May 14, 2024;
- ix. a post by Stefanie Lambert (“@StefLambertEsq”) on the social media website “X” dated May 9, 2024, accessed and saved on May 17, 2024;
- x. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Stefanie Lambert (“@StefLambertEsq”) on May 9, 2024, accessed and saved on May 14, 2024;
- xi. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 9, 2024, and accessed and saved on May 17, 2024;

- xii. a second post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 9, 2024, and accessed and saved on May 17, 2024;
 - xiii. a post by the account @SheriffLeaf from the social media website “X” dated May 9, 2024, accessed and saved on May 15, 2024;
 - xiv. a post by the account @SheriffLeaf from the social media website “X” dated May 10, 2024, accessed and saved on May 15, 2024;
 - xv. a second post by the account @SheriffLeaf from the social media website “X” dated May 10, 2024, accessed and saved on May 15, 2024.
- k. Attached hereto as **Exhibit 56** is a true and correct copy of relevant posts to social media during the week of May 12, 2024. Specifically, it includes:
- i. a post from the social media website “X” with the poster’s name redacted, which was re-shared by Patrick Byrne (“@PatrickByrne”) on May 12, 2024, and accessed and saved on May 17, 2024;
 - ii. a post by the account @SheriffLeaf from the social media website “X” dated May 13, 2024, accessed and saved on May 14, 2024;
 - iii. transcript of broadcast story, *Arraignments in Adams Township Election Case*, Fox 47 News (May 14, 2024), <https://www.fox47news.com/neighborhoods/jackson-hillsdale/former-adams-township-clerk-stephanie-scott-and-her-attorney-stefanie-lambert-plead-not-guilty>.

8. Attached hereto as **Exhibit 57** is a true and correct copy of *Atkins v. Fisher*, 232 F.R.D. 116 (D.D.C. 2005), provided to the Court and Counsel for Mr. Byrne at the May 16, 2024 hearing.

9. Attached hereto as **Exhibit 58** is a true and correct copy of *Kramer v. Tribe*, 156 F.R.D. 96 (D.N.J. 1994) *aff'd without opinion*, 52 F.3d 315 (3d Cir. 1995), provided to the Court and Counsel for Mr. Byrne at the May 16, 2024 hearing.

10. Attached hereto as **Exhibit 59** is a true and correct copy *Vollmer v. Publishers Clearing House*, 49 F.3d 698 (7th Cir. 2001), provided to the Court and Counsel for Mr. Byrne at the May 16, 2024 hearing.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Signed this 17th day of May, 2024, at Los Angeles, California.

/s/Davida Brook

Davida Brook