

NISSENBAUM LAW GROUP, LLC

2400 Morris Avenue, Suite 301

Union, New Jersey 07083

(908) 686-8000

Steven L. Procaccini (Attorney ID 041702002)

Attorneys for Defendants World Mission Society,

Church of God A NJ Nonprofit Corporation;

Tara Whalen; Richard Whalen; and Victor Lozada

MICHELE COLÓN, a New Jersey resident,

Plaintiff,

v.

WORLD MISSION SOCIETY, CHURCH OF
GOD, A NJ NONPROFIT CORPORATION,
ET AL.,

Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

Docket No. BER-L-6490-16

Civil Action

CONSOLIDATED WITH:

Docket No. BER-L-3007-13

SUBPOENA DUCES TECUM

Served Upon YouTube, LLC:

YouTube, LLC (Subsidiary of Google, LLC)

c/o Corporation Service Company

2710 Gateway Oaks Drive, Suite 150N

Sacramento, CA 95833

google-legal-support@google.com

With Notice To:

Michele Colón

c/o Peter L. Skolnik, Esq.

Peter L. Skolnik LLC

963 Belvidere Ave.

Plainfield, NJ 07060

pskolnik@clarkguldin.com;

pls@peterlskolnik.com

Attorney for Plaintiff Michele Colon

Gartenberg Howard, LLP

Steven R. Vanderlinden, Esq.

Two University Plaza, Suite 400

Hackensack, New Jersey 07601

thoward@gartenberghoward.com

Attorneys for defendant Dong Il Lee

YOU ARE HEREBY COMMANDED to appear in person for oral deposition to testify as to matters known, or reasonably available to you, in relation to the above-captioned matters, before a person authorized by the laws of the State of New Jersey to administer oaths on **Friday**,

June 19, 2020, commencing at 10:00 A.M., and continuing from day-to-day until such time as the deposition is complete, unless the parties mutually agree to hold the deposition on a different date or time or at a different location.

YOU ARE ALSO HEREBY NOTIFIED that we will conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video teleconferencing (VTC) services offered by Veritext (“Web Deposition”) or telephonically only to provide remote access for those parties wishing to participate in the deposition via the internet and/or telephone. Also take notice that, the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent. Please contact the noticing attorney at least five (5) calendar days prior to the deposition so that the necessary credentials, call-in numbers, testing and information, if necessary, can be provided to you prior to the proceedings. In addition, we also reserve the right to utilize instant visual display technology such that the court reporter’s writing of the proceeding will be displayed simultaneous to their writing of same on ones laptop, iPad, tablet or other type of display device connected to the court reporter.

YOU ARE FURTHER HEREBY COMMANDED to bring with you to the above time and place all of the evidence described in Exhibit A, attached hereto. If you produce the information in Exhibit A on **Friday, June 19, 2020**, we may agree to adjourn the oral deposition. The documents herein subpoenaed shall not be produced or released until the date specified herein for the deposition. If the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action. At the deposition, the parties shall have the right to inspect and copy the subpoenaed evidence produced.

The fact witness subpoenaed herein may be eligible for out-of-pocket expenses and loss of pay, if any, incurred in attending the deposition.

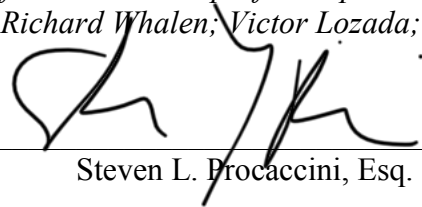
Failure to appear or comply with the command of this Subpoena will subject you to the penalties provided by law.

YOU ARE ALSO HEREBY NOTIFIED that hard copy and electronically stored documents (“ESI”), documents and other tangible things may be an important and irreplaceable source of discovery and/or evidence in connection with any potential claims and/or defenses

between or among the Defendants and the Plaintiff related to the above-captioned actions. As such, the law requires the preservation of all print and ESI no matter where it is stored.

NISSENBAUM LAW GROUP, LLC
*Attorneys for Defendants World Mission Society,
Church of God, a NJ Nonprofit Corporation; Tara
Whalen; Richard Whalen; Victor Lozada; and Jun
Seok Lee*

BY:



Steven L. Procaccini, Esq.

Dated: June 2, 2020

EXHIBIT A

INSTRUCTIONS

You are required to obtain and bring with you all documents available (or that can be made available) to you and any of your representatives, employees, agents, servants or attorneys as identified below.

Each item that requires you to bring documents concerning communications to, from or within a business and/or corporate entity, is hereby designated to mean, and should be construed to include, all communications by and between representatives, employees, agents and/or servants of the business and/or corporate entity.

DEFINITIONS

1. “Person” or “persons” shall mean all natural persons, firms, corporations, partnerships or other business associations, governmental and quasi-governmental agencies, and all other legal entities, including all members, officers, employees, agents, representatives, attorneys, successors, predecessors, assigns, divisions, affiliates and subsidiaries.

2. “Possession, custody or control” of documents means your possession, custody or control or right to possession, custody or control, including your divisions, departments, branches and other subdivisions, domestic and foreign, subsidiaries, domestic and foreign joint ventures, whether or not incorporated, domestic and foreign affiliates, predecessors in interest, present and former officials, executives, officers, employees, agents, attorneys and all other persons acting or purporting to act on your behalf, or on behalf of its divisions, departments, branches, subdivisions, subsidiaries, joint ventures, affiliates or predecessors in interest, as well as your employees, independent contractors, agents, attorneys, accountants and any other person acting on your behalf.

3. “Document” refers to any written or graphic matter however produced or reproduced including, but not limited to, all papers, books, periodicals, minutes, instructions, records, book accounts, notes, telegrams, accounting books and records, tables, analysis, work papers, reports, typewrites and handwritings, data sheets and processing cards, internal memoranda, contracts, drafts of documents, diaries, letters sent or received, telecopied and/or fax transmissions or other correspondence, written communications, photographs, drafts, checks, vouchers, tape recordings or other electronic or mechanical recordings and any log or transcript thereof, bills, invoices, orders, bills of lading, receipts, or any other tangible thing of any communication or representation, including letters, words, pictures, sounds, symbols or combinations thereof.

a. If any document requires translation through some media to which you do not have access, such access must be provided. If an original or an “original” non-identical copy of a document is not available, the term “document” also means and includes identical copies of such originals and non-identical copies.

b. If a document or copy thereof is no longer in existence or is no longer in your custody, control or possession, state the name and address of the person or other entity

last having custody and/or possession of said document to the best of your knowledge and the reason for it no longer existing, or being under your custody, control or possession.

c. The term “document” and “documents” includes all of the above materials, whether there is an asserted privilege or not. In the event that any document to be produced herein calls for information, or for the identification of a document you deem to be privileged, in part or in whole, the information should be given, or the document “identified” (as hereinafter defined) to the fullest extent possible consistent with such claim of privilege, and you should provide a privilege list as required under the New Jersey Court Rules including without limitation R. 4:10-2(e), which, *inter alia*, shall describe the document, describe the privilege claimed and detail the grounds relied upon for the claim of privilege. Unless otherwise indicated, document(s) to be identified shall include documents in your possession, custody or control, or other documents, the existence or substance of which the plaintiffs and/or defendants have knowledge.

4. The term “correspondence” means, in addition to its ordinary meaning, emails, any recording, memorandum or note (handwritten or otherwise) of conversations or telephone calls.

5. The term “electronically stored information” shall mean and include any information, database information, active/online data, migrated data, archival data, near-line data, residual data, and/or backup data (regardless of whether such data is stored on tape or optical disk). **THE ELECTRONICALLY STORED INFORMATION PROVIDED SHALL BE IN ITS NATIVE FORMAT WITH ALL ATTACHMENTS.** All electronically stored information shall be identified in such a manner so as to include the form in which has been stored including, but not limited to: (a) paper printouts, (b) digital communications (e.g. e-mails, voice mails, instant messaging, blog posts, forum posts, forum or other webpage messages), both sent and received, whether internally or externally and regardless whether hard copies of the information exists. Moreover, in the event that these communications are stored by third parties (i.e. AOL, hotmail, etc.) you should contact those parties and instruct them to likewise preserve the ESI within those communications; (c) e-mail server stores (e.g., Microsoft Outlook, Lotus Domino .NSF or Microsoft Exchange .EDB); (d) word-processed documents and files (Microsoft Word or WordPerfect) including drafts and revisions; (e) accounting application data (e.g., Quickbooks, Money, and Peachtree); (f) spreadsheets and tables (e.g., Excel or Lotus 123), including drafts and revisions; (g) databases (e.g., Access, Oracle, SQL Server data, SAP); (h) CAD (computer-aided design) files, including drafts and revisions; (i) image and facsimile files (e.g., .PDF, .TIFF, .JPEG, .GIF images); (j) sound recordings (e.g., .WAV or .MP3 files); (k) video and animation files (e.g., .AVI, .MPEG or .MOV); (l) presentation data or slide shows produced by presentation software such as Microsoft PowerPoint or Corel Presentations; (m) graphs, charts and other data produced by project management software such as Microsoft Project; (n) data generated by calendaring (e.g., Outlook PST or blog entries), task management and personal information management (PIM) software such as Microsoft Outlook, ACT!, or Lotus Notes; (o) data created with the use of personal data assistants (PDAs), such as PalmPilot, HP Jornada, Cassiopeia, Blackberry or other Windows CE-based or Pocket PC devices; (p) data created with the use of document management software; (q) data created with the use of paper and electronic mail logging and routing software; (r) internet and Web-browser-generated history files, caches and “cookies” files generated at the workstation of each employee and/or agent in your clients’ employ and on any and all backup

storage media and regardless whether hard copies of the information exists; (s) network access and server activity logs; (t) backup and archival files (e.g., Veritas, ZIP, .GHO); and, (u) all other files generated by users through the use of computers and/or telecommunications, including but not limited to voice mail, email address(es), Internet Protocol (IP) Address(es) and/or IP logs.

a. Electronic documents and the storage media on which they reside contain relevant, discoverable information beyond that which may be found in printed documents. Because hard copies do not always preserve electronic searchability or metadata, they are not an adequate substitute for, or cumulative of, electronically stored versions. **THEREFORE, YOU ARE ADVISED THAT EVEN WHERE A PAPER COPY EXISTS, WE WILL SEEK ALL DOCUMENTS IN THEIR ELECTRONIC FORM ALONG WITH INFORMATION ABOUT THOSE DOCUMENTS CONTAINED ON THE MEDIA.** We also will seek paper printouts of only those documents that contain unique information after they were printed out (such as paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting and redactions) along with any paper documents for which no corresponding electronic files exist. If information exists in both electronic and paper forms, you should preserve both forms.

b. Unless otherwise indicated, all electronically stored information shall be produced in the form or forms in which you ordinarily maintain it or in a form or forms that are reasonably usable.

c. Electronic mail messages should be produced in paper printout as well as in PST computer file format.

d. Unless otherwise indicated, all electronically stored information shall include all metadata intact. If any metadata or other information has been “locked” and/or “scrubbed” from any electronically stored information, please provide a log of the information locked and/or scrubbed and the stated reason(s) for locking and/or scrubbing such information.

6. The term “tangible things” means all documents, instruments, equipment, inventory, creations, or palpable displays, which relate to the allegations or defenses contained in the pleadings.

7. The term “including” means including, but not by way of limitation.

8. “All documents” means every document, whether an original or copy, as defined above, known to you and every such document which can be located or discovered by reasonably diligent efforts.

9. The word “and” and “or” shall be used conjunctively or disjunctively to make each request inclusive rather than exclusive.

10. The terms “you” or “your” shall mean the party to whom this subpoena is directed.

11. Grammar and syntax as used in this subpoena shall be construed and interpreted to give proper meaning and consistency to its context. The singular includes the plural, the masculine includes the feminine and neuter gender, and the present tense includes the past and future tense.

12. The term “YouTube Livestream” shall mean any video that was streamed live on YouTube.com, through YouTube’s built-in live stream functionality, regardless of whether that video was subsequently posted to a YouTube account.

DOCUMENTS TO BE PRODUCED

1. Any and all YouTube Livestreams commenced by any of the following persons after January 1, 2020:
 - a. Jordan Young (YouTube account name: Jordan Young)
 - b. Jordan Hatfield (YouTube account name: Great Light Studios)
 - c. Kelsey Wells (YouTube account name: kels729)
 - d. Michele Colón
 - e. Ron “Ronnie” Ramos
 - f. Tim Hoffman
 - g. Drew “DJ” Gomez
 - h. Numa Xekai
 - i. Raymond Gonzalez
2. Any and all documents and/or other tangible things in your possession, custody or control related to any YouTube Livestreams produced pursuant to the above Request.

NISSENBAUM LAW GROUP, LLC

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Union, New Jersey 07083

(908) 686-8000

Steven L. Procaccini (Attorney ID 041702002)

Attorneys for Defendants World Mission Society,

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MICHELE COLÓN, a New Jersey resident,

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WORLD MISSION SOCIETY, CHURCH OF
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Defendants.

SUPERIOR COURT OF NEW JERSEY
LAW DIVISION: BERGEN COUNTY

Docket No. BER-L-6490-16

Civil Action

CONSOLIDATED WITH:

Docket No. BER-L-3007-13

SUBPOENA DUCES TECUM

Served Upon Zoom Video Communications, Inc.: With Notice To:

Zoom Video Communications, Inc.
c/o Eric S. Yuan
55 Almaden Blvd, 6th Floor
San Jose, California 95113
legal@zoom.us

Michele Colón
c/o Peter L. Skolnik, Esq.
Peter L. Skolnik LLC
963 Belvidere Ave.
Plainfield, NJ 07060
pskolnik@clarkguldin.com;
pls@peterlskolnik.com
Attorney for Plaintiff Michele Colon

Gartenberg Howard, LLP
Steven R. Vanderlinden, Esq.
Two University Plaza, Suite 400
Hackensack, New Jersey 07601
thoward@gartenberghoward.com
Attorneys for defendant Dong Il Lee

YOU ARE HEREBY COMMANDED to appear in person for oral deposition to testify as to matters known, or reasonably available to you, in relation to the above-captioned matters, before a person authorized by the laws of the State of New Jersey to administer oaths on **Friday**,

June 19, 2020, commencing at 2:00 P.M., and continuing from day-to-day until such time as the deposition is complete, unless the parties mutually agree to hold the deposition on a different date or time or at a different location.

YOU ARE ALSO HEREBY NOTIFIED that we will conduct this deposition utilizing the secure web-based deposition option afforded by Veritext or in the alternative video teleconferencing (VTC) services offered by Veritext (“Web Deposition”) or telephonically only to provide remote access for those parties wishing to participate in the deposition via the internet and/or telephone. Also take notice that, the court reporter may also be remote via one of the options above for the purposes of reporting the proceeding and may or may not be in the presence of the deponent. Please contact the noticing attorney at least five (5) calendar days prior to the deposition so that the necessary credentials, call-in numbers, testing and information, if necessary, can be provided to you prior to the proceedings. In addition, we also reserve the right to utilize instant visual display technology such that the court reporter’s writing of the proceeding will be displayed simultaneous to their writing of same on ones laptop, iPad, tablet or other type of display device connected to the court reporter.

YOU ARE FURTHER HEREBY COMMANDED to bring with you to the above time and place all of the evidence described in Exhibit A, attached hereto. If you produce the information in Exhibit A on **Friday, June 19, 2020**, we may agree to adjourn the oral deposition. The documents herein subpoenaed shall not be produced or released until the date specified herein for the deposition. If the deponent is notified that a motion to quash the subpoena has been filed, the deponent shall not produce or release the subpoenaed evidence until ordered to do so by the court or the release is consented to by all parties to the action. At the deposition, the parties shall have the right to inspect and copy the subpoenaed evidence produced.

The fact witness subpoenaed herein may be eligible for out-of-pocket expenses and loss of pay, if any, incurred in attending the deposition.

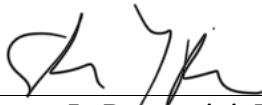
Failure to appear or comply with the command of this Subpoena will subject you to the penalties provided by law.

YOU ARE ALSO HEREBY NOTIFIED that hard copy and electronically stored documents (“ESI”), documents and other tangible things may be an important and irreplaceable source of discovery and/or evidence in connection with any potential claims and/or defenses

between or among the Defendants and the Plaintiff related to the above-captioned actions. As such, the law requires the preservation of all print and ESI no matter where it is stored.

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*Attorneys for Defendants World Mission Society,
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Whalen; Richard Whalen; Victor Lozada; and Jun
Seok Lee*

BY:



Steven L. Procaccini, Esq.

Dated: June 2, 2020

EXHIBIT A

INSTRUCTIONS

You are required to obtain and bring with you all documents available (or that can be made available) to you and any of your representatives, employees, agents, servants or attorneys as identified below.

Each item that requires you to bring documents concerning communications to, from or within a business and/or corporate entity, is hereby designated to mean, and should be construed to include, all communications by and between representatives, employees, agents and/or servants of the business and/or corporate entity.

DEFINITIONS

1. “Person” or “persons” shall mean all natural persons, firms, corporations, partnerships or other business associations, governmental and quasi-governmental agencies, and all other legal entities, including all members, officers, employees, agents, representatives, attorneys, successors, predecessors, assigns, divisions, affiliates and subsidiaries.

2. “Possession, custody or control” of documents means your possession, custody or control or right to possession, custody or control, including your divisions, departments, branches and other subdivisions, domestic and foreign, subsidiaries, domestic and foreign joint ventures, whether or not incorporated, domestic and foreign affiliates, predecessors in interest, present and former officials, executives, officers, employees, agents, attorneys and all other persons acting or purporting to act on your behalf, or on behalf of its divisions, departments, branches, subdivisions, subsidiaries, joint ventures, affiliates or predecessors in interest, as well as your employees, independent contractors, agents, attorneys, accountants and any other person acting on your behalf.

3. “Document” refers to any written or graphic matter however produced or reproduced including, but not limited to, all papers, books, periodicals, minutes, instructions, records, book accounts, notes, telegrams, accounting books and records, tables, analysis, work papers, reports, typewrites and handwritings, data sheets and processing cards, internal memoranda, contracts, drafts of documents, diaries, letters sent or received, telecopied and/or fax transmissions or other correspondence, written communications, photographs, drafts, checks, vouchers, tape recordings or other electronic or mechanical recordings and any log or transcript thereof, bills, invoices, orders, bills of lading, receipts, or any other tangible thing of any communication or representation, including letters, words, pictures, sounds, symbols or combinations thereof.

a. If any document requires translation through some media to which you do not have access, such access must be provided. If an original or an “original” non-identical copy of a document is not available, the term “document” also means and includes identical copies of such originals and non-identical copies.

b. If a document or copy thereof is no longer in existence or is no longer in your custody, control or possession, state the name and address of the person or other entity

last having custody and/or possession of said document to the best of your knowledge and the reason for it no longer existing, or being under your custody, control or possession.

c. The term “document” and “documents” includes all of the above materials, whether there is an asserted privilege or not. In the event that any document to be produced herein calls for information, or for the identification of a document you deem to be privileged, in part or in whole, the information should be given, or the document “identified” (as hereinafter defined) to the fullest extent possible consistent with such claim of privilege, and you should provide a privilege list as required under the New Jersey Court Rules including without limitation R. 4:10-2(e), which, *inter alia*, shall describe the document, describe the privilege claimed and detail the grounds relied upon for the claim of privilege. Unless otherwise indicated, document(s) to be identified shall include documents in your possession, custody or control, or other documents, the existence or substance of which the plaintiffs and/or defendants have knowledge.

4. The term “correspondence” means, in addition to its ordinary meaning, emails, any recording, memorandum or note (handwritten or otherwise) of conversations or telephone calls.

5. The term “electronically stored information” shall mean and include any information, database information, active/online data, migrated data, archival data, near-line data, residual data, and/or backup data (regardless of whether such data is stored on tape or optical disk). **THE ELECTRONICALLY STORED INFORMATION PROVIDED SHALL BE IN ITS NATIVE FORMAT WITH ALL ATTACHMENTS.** All electronically stored information shall be identified in such a manner so as to include the form in which has been stored including, but not limited to: (a) paper printouts, (b) digital communications (e.g. e-mails, voice mails, instant messaging, blog posts, forum posts, forum or other webpage messages), both sent and received, whether internally or externally and regardless whether hard copies of the information exists. Moreover, in the event that these communications are stored by third parties (i.e. AOL, hotmail, etc.) you should contact those parties and instruct them to likewise preserve the ESI within those communications; (c) e-mail server stores (e.g., Microsoft Outlook, Lotus Domino .NSF or Microsoft Exchange .EDB); (d) word-processed documents and files (Microsoft Word or WordPerfect) including drafts and revisions; (e) accounting application data (e.g., Quickbooks, Money, and Peachtree); (f) spreadsheets and tables (e.g., Excel or Lotus 123), including drafts and revisions; (g) databases (e.g., Access, Oracle, SQL Server data, SAP); (h) CAD (computer-aided design) files, including drafts and revisions; (i) image and facsimile files (e.g., .PDF, .TIFF, .JPEG, .GIF images); (j) sound recordings (e.g., .WAV or .MP3 files); (k) video and animation files (e.g., .AVI, .MPEG or .MOV); (l) presentation data or slide shows produced by presentation software such as Microsoft PowerPoint or Corel Presentations; (m) graphs, charts and other data produced by project management software such as Microsoft Project; (n) data generated by calendaring (e.g., Outlook PST or blog entries), task management and personal information management (PIM) software such as Microsoft Outlook, ACT!, or Lotus Notes; (o) data created with the use of personal data assistants (PDAs), such as PalmPilot, HP Jornada, Cassiopeia, Blackberry or other Windows CE-based or Pocket PC devices; (p) data created with the use of document management software; (q) data created with the use of paper and electronic mail logging and routing software; (r) internet and Web-browser-generated history files, caches and “cookies” files generated at the workstation of each employee and/or agent in your clients’ employ and on any and all backup

storage media and regardless whether hard copies of the information exists; (s) network access and server activity logs; (t) backup and archival files (e.g., Veritas, ZIP, .GHO); and, (u) all other files generated by users through the use of computers and/or telecommunications, including but not limited to voice mail, email address(es), Internet Protocol (IP) Address(es) and/or IP logs.

a. Electronic documents and the storage media on which they reside contain relevant, discoverable information beyond that which may be found in printed documents. Because hard copies do not always preserve electronic searchability or metadata, they are not an adequate substitute for, or cumulative of, electronically stored versions. **THEREFORE, YOU ARE ADVISED THAT EVEN WHERE A PAPER COPY EXISTS, WE WILL SEEK ALL DOCUMENTS IN THEIR ELECTRONIC FORM ALONG WITH INFORMATION ABOUT THOSE DOCUMENTS CONTAINED ON THE MEDIA.** We also will seek paper printouts of only those documents that contain unique information after they were printed out (such as paper documents containing handwriting, signatures, marginalia, drawings, annotations, highlighting and redactions) along with any paper documents for which no corresponding electronic files exist. If information exists in both electronic and paper forms, you should preserve both forms.

b. Unless otherwise indicated, all electronically stored information shall be produced in the form or forms in which you ordinarily maintain it or in a form or forms that are reasonably usable.

c. Electronic mail messages should be produced in paper printout as well as in PST computer file format.

d. Unless otherwise indicated, all electronically stored information shall include all metadata intact. If any metadata or other information has been “locked” and/or “scrubbed” from any electronically stored information, please provide a log of the information locked and/or scrubbed and the stated reason(s) for locking and/or scrubbing such information.

6. The term “tangible things” means all documents, instruments, equipment, inventory, creations, or palpable displays, which relate to the allegations or defenses contained in the pleadings.

7. The term “including” means including, but not by way of limitation.

8. “All documents” means every document, whether an original or copy, as defined above, known to you and every such document which can be located or discovered by reasonably diligent efforts.

9. The word “and” and “or” shall be used conjunctively or disjunctively to make each request inclusive rather than exclusive.

10. The terms “you” or “your” shall mean the party to whom this subpoena is directed.

11. Grammar and syntax as used in this subpoena shall be construed and interpreted to give proper meaning and consistency to its context. The singular includes the plural, the masculine includes the feminine and neuter gender, and the present tense includes the past and future tense.

12. The term “Recorded Zoom Call” shall mean any Zoom call that any person in that call recorded with Zoom’s built-in recording feature, whether or not anyone on that call subsequently saved that recording.

DOCUMENTS TO BE PRODUCED

1. Any and all Recorded Zoom Calls between Jordan Hatfield and one or more of the following persons, regardless of who initiated the call, regardless of who recorded the call, and regardless of the length of time any person spent on the call:
 - a. Jordan Young
 - b. Michele Colón
 - c. Ron “Ronnie” Ramos
 - d. Kelsey Wells
 - e. Tim Hoffman
 - f. Drew “DJ” Gomez
 - g. Numa Xekai
 - h. Raymond Gonzalez

2. Any and all Recorded Zoom Calls between Jordan Young and one or more of the following persons, regardless of who initiated the call, regardless of who recorded the call, and regardless of the length of time any person spent on the call:
 - a. Jordan Hatfield
 - b. Michele Colón
 - c. Ron “Ronnie” Ramos
 - d. Kelsey Wells
 - e. Tim Hoffman
 - f. Drew “DJ” Gomez
 - g. Numa Xekai
 - h. Raymond Gonzalez

3. Any and all documents and/or other tangible things in your possession, custody or control related to any Recorded Zoom Calls produced pursuant to either of the above two Requests.