

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA**

US DOMINION, INC., *et al.*,

Plaintiffs/Counterclaim  
Defendants,

No. 1:21-cv-02130-CJN

v.

HERRING NETWORKS, INC., *et al.*,

Judge Carl J. Nichols

Defendants/  
Counterclaim Plaintiffs/  
Third-Party Plaintiffs,

v.

AT&T SERVICES, INC., *et al.*,

Third-Party Defendants.

**MOTION FOR ENTRY OF DEFENDANTS’  
JOINT PROPOSED ORDER GOVERNING DISCOVERY MATTERS**

Defendant Christina Bobb (“Bobb”) respectfully requests the Court enter Defendants’ joint proposed order governing discovery matters, attached to Defendants Herring Networks, Inc., d/b/a One America News Network, Charles Herring, Robert Herring, Sr., and Chanel Rion’s parallel motion for entry (the “Herring Motion,” Doc. 142, in support of “Defendants’ Proposed Order,” Doc. 142-1). In support, Bobb adopts and incorporates the arguments set forth in the Herring Motion.

Additionally, Bobb writes separately to emphasize that Plaintiffs have not yet conferred with Bobb regarding her objections to Plaintiffs’ requests for production, the appropriate scope of document discovery, potential search terms, possible search, review, or production timelines, or any other matter relating to discovery other than the parties’ respective proposed protocols. Without question, any order entered by the Court should recognize the differing status of each case, and of each consolidated Defendant. The Defendants’ Proposed Order does so by, *inter alia*, providing that

“[n]o party shall be required to produce any documents or ESI until its objections to a particular request for production are resolved by agreement or by the Court,” Doc. 142-1 at 6, and by setting production deadlines only for those “document requests pending at the time of entry of this Order, for which all objections have been resolved by agreement of the parties or the Court,” *id.* at 9–10. The Defendants’ Proposed Order thus provides a sensible framework for organized discovery that supplements, but does not replace, the requirements of Rules 26 and 34, while also accommodating the varying circumstances of the individual Defendants.

Accordingly, Bobb respectfully requests the Court enter the Defendants’ Proposed Order.

Dated: October 20, 2023

Respectfully submitted,

/s/Gregory M. Singer

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