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	0, 2021
UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY LOUISVILLE DIVISION Case No. 3-19-CV-00851-BJB-CHL CHELSEY NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, PLAINTIFFS v. LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT, et al., DEFENDANTS DEPONENT: CRYSTAL LUDWICK DATE: MARCH 30, 2021 COURT REPORTER: JESSICA TAYLOR ROSS	APPEARANCES APPEARANCES COUNSEL FOR PLAINTIFFS: Bryan D Neihart, Esq, AZ Bar No 035937 (Via Zoom videoconference) ALLIANCE DEFENDING FREEDOM I5100 N 90th Street Scottsdale, AZ 85260 Telephone: (480) 444-0020 email: bneihart@ADFlegal org COUNSEL FOR DEFENDANT, LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT: John F Carroll, Esq John F Carroll, Esq KVia Zoom videoconference) ASSISTANT JEFFERSON COUNTY ATTORNEYS Sil Court Place, Suite 900 Louisville, KY 40202
TAYLOR COURT REPORTING KENTUCKY 2901 SIX MILE LANE LOUISVILLE, KENTUCKY 40220	Telephone: (502) 574-6321 rmail: john carroll2@louisvilleky gov rmail: jason fowler@louisvilleky gov
1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 CRYSTAL LUDWICK 16 MARCH 30, 2021 17 18 19 20 21 22 23 24 25	1

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	March 3	30, 202	1
	5		7
1		1	
2	EXHIBITS	2	INTRODUCTION
4	PAGE	3	
5 6	Exhibit A 15	4	THE COURT REPORTER: We're on the
O	(Website "About" page)	5	record. My name is Jessie Ross, the court
7		6	reporter. I'm reporting remotely today from
8	Exhibit B 18 (Website "Price" page)	7	Louisville, Kentucky via Zoom videoconference.
9	Exhibit C 19	8	Counsel, please state your name and whom you
10	(Website "Wedding" page)	9	represent, and let us know if there is anyone
1.1	Exhibit D 21	10	else in the room with you.
11 12	(Photographs) Exhibit E 22	11	MR. NEIHART: Good afternoon. My
	(Photographs)	12	name is Bryan Neihart. I'm appearing on behalf
13	Exhibit F 23	13	of the plaintiffs, Chelsey Nelson Photography
14	(Photographs)	14	LLC and Chelsey Nelson. There's no one else
15	Exhibit G 24 (Photographs)	15	present in the room with me.
16	· · · · · · · · · · · · · · · · · · ·	16	MR. CARROLL: My name is John
17	Exhibit H 32 (Metro Ordinance 92.05)	17	Carroll and I represent the defendants along
18	Exhibit I 25	18	with Jason Fowler. We are not in the same room
19	(Instagram screenshots)	19	together and there is no one else in the rooms
10	Exhibit J 28	20	with us.
20 21	(FEVA website "Welcome" page) Exhibit K 30	21	THE COURT REPORTER: Thank you.
21	(FEVA photographer directory)	22	I'll now ask the witness, can you please state
22	Exhibit L 30	23	your full name and let us know if there is
23	(FEVA website "Joining" page)	24	anyone else in the room with you.
24 25		25	THE WITNESS: Crystal Rae Ludwick
2 3 4 5 6 7 8 9 10 11 12 13 14	STIPULATIONS The remote deposition on written questions of CRYSTAL LUDWICK, was taken pursuant to Notice via Zoom videoconference, on Tuesday, March 30, 2021; said deposition, to be used in accordance with the Federal Rules of Civil Procedure.	2 3 4 5 6 7 8 9 10 11 12 13 14	THE COURT REPORTER: Is Rae just R-a-y? THE WITNESS: No, it's R-a-e. THE COURT REPORTER: R-a-e. Okay * * * THE COURT REPORTER: Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.)
16		16	THE COURT REPORTER: Do you
17		17	solemnly swear or affirm the testimony you're
18		18	about to give will be the truth, the whole
19		19	truth, and nothing but the truth?
20		20	THE WITNESS: Yes.
21		21	THE COURT REPORTER: Thank you.
22		22	
23		23	
24		24	
25		25	
23		25	

March 30, 2021			
	9		11
1		1	wedding photography on behalf of Crystal Ludwick
2	PROCEEDINGS	2	Photo LLC?
3		3	A. Do I?
4	CRYSTAL LUDWICK, the said witness,	4	THE COURT REPORTER: Or an
5	called by the Plaintiffs, CHELSEY NELSON	5	employee, agent, or independent contractor under
6	PHOTOGRAPHY, LLC and CHELSEY NELSON, having been	6	your supervision.
7	first duly sworn, was examined and deposed as	7	A. Yes.
8	follows, with the court reporter reading the	8	Q. Please assume that the remaining
9	questions:	9	questions about your photography and photography
10	questions.	10	services also refer to the photography and
11	* * *	11	photography services of Crystal Ludwick Photo
12	EXAMINATION	12	LLC.
13	Q What is your name, age, current	13	Are you based out of Louisville,
14	residence address, and occupation?	14	Kentucky? If not, where is Crystal Ludwick
15	· · · · · · · · · · · · · · · · · · ·	15	Photo LLC's principal place of business?
16	A My name is Crystal Rae Ludwick	16	A. Yes, Louisville, Kentucky.
17	Age; Address; ,	17	Q. Do you offer photography services
18	Louisville, Kentucky, 40220 What was the other	18	to the general public for a fee?
	question?	19	A. Yes.
19	THE COURT REPORTER: Occupation	20	Q. Do you offer wedding photography
20	A I'm a photographer	21	for a fee to the general public?
21	Q Do you know any of the parties to	22	A. Yes.
22	the above-entitled action, and if so, how long	23	Q. Do you offer wedding photography
23	have you known such parties or party?	24	for a fee to members of the public who reside in
24	A Do I know Chelsey Nelson? No	25	or near Louisville, Kentucky?
25	Q Have you discussed taking this		, ,
	10		12
1	deposition with any official from the	1	A. Yes.
_	deposition with any official from the	_	11. 105.
2	Louisville/Jefferson County Metro Government?	2	O. Do you offer to photograph same-sex
2	Louisville/Jefferson County Metro Government? If so, describe everything you talked about		Q. Do you offer to photograph same-sex
2 3 4	If so, describe everything you talked about.	2 3 4	and opposite-sex weddings for a fee for persons
3 4	If so, describe everything you talked about. A. No, I have not.	3	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky?
3	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal	3 4	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes.
3 4 5	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC?	3 4 5	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex
3 4 5 6	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who
3 4 5 6 7	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick	3 4 5 6 7	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex
3 4 5 6 7 8	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6 7 8	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes.
3 4 5 6 7 8 9	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6 7 8	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to
3 4 5 6 7 8 9	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo	3 4 5 6 7 8 9	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements
3 4 5 6 7 8 9 10	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part?	3 4 5 6 7 8 9 10	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near
3 4 5 6 7 8 9 10 11	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes.	3 4 5 6 7 8 9 10 11	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky?
3 4 5 6 7 8 9 10 11 12 13	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices	3 4 5 6 7 8 9 10 11 12 13	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes.
3 4 5 6 7 8 9 10 11 12 13 14 15	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC?	3 4 5 6 7 8 9 10 11 12 13 14 15	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex
3 4 5 6 7 8 9 10 11 12 13 14 15 16	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6 7 8 9 10 11 12 13 14	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons
3 4 5 6 7 8 9 10 11 12 13 14 15 16	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services	3 4 5 6 7 8 9 10 11 12 13 14 15 16	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes.
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes. Q. Do you create wedding photography	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with other wedding photographers in or near the
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes. Q. Do you create wedding photography on behalf of Crystal Ludwick Photo LLC?	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with other wedding photographers in or near the Louisville area?
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes. Q. Do you create wedding photography on behalf of Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with other wedding photographers in or near the Louisville area? A. Do I compete for business? I don't
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes. Q. Do you create wedding photography on behalf of Crystal Ludwick Photo LLC? A. Yes. Q. Do you or an employee, agent, or	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with other wedding photographers in or near the Louisville area? A. Do I compete for business? I don't know how to answer that. Compete. I mean, I
3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	If so, describe everything you talked about. A. No, I have not. Q. Are you the founder of Crystal Ludwick Photo LLC? A. Yes. Q. Do you operate Crystal Ludwick Photo LLC? A. Yes. Q. Do you own Crystal Ludwick Photo LLC in whole or in part? A. Yes. Q. Are you familiar with the practices and policies of Crystal Ludwick Photo LLC? A. Yes. Q. Are you familiar with the services Crystal Ludwick Photo LLC offers and provides? A. Yes. Q. Do you create wedding photography on behalf of Crystal Ludwick Photo LLC? A. Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. Yes. Q. Have you photographed same-sex engagements for a fee in the past for persons who reside in or near Louisville, Kentucky? A. Same-sex engagements? Yes. Q. Do you compete for business with other wedding photographers in or near the Louisville area? A. Do I compete for business? I don't

	March 30, 2021				
	13		15		
1	engagement and wedding photographs of	1	Q. Please take a look at Exhibit A,		
2	opposite-sex weddings with other wedding	2	pages 1–2. Are these pages true and correct		
3	photographers in or near the Louisville area?	3	copies of the current "About" page of Crystal		
4	A. Is that the same question that you	4	Ludwick Photo LLC's website?		
5	just asked me? Okay.	5	A. Yes.		
6	THE COURT REPORTER. No. I'll	6	(Whereupon, the referred to		
7	repeat it.	7	document was marked as Exhibit A,		
8	Q. Do you compete to provide	8	and is attached hereto and made a		
9	engagement and wedding photographs of	9	part hereof.)		
10	opposite-sex weddings with other wedding	10	Q. If these pages are not true and		
11	photographers in or near the Louisville area?	11	correct copies of the current "About" page of		
12	A. No.	12	Crystal Ludwick Photo LLC's website, are they		
13	Q. Do you have a business website for	13	true and correct copies of a former "About" page		
14	Crystal Ludwick Photo LLC accessible at this	14	of Crystal Ludwick Photo LLC's website?		
15	address: http://www.crystalludwickphoto.com/?	15	A. Yes.		
16	A. Yes.	16	THE COURT REPORTER: You said they		
17	Q. Do you advertise or promote the	17	are current, right?		
18	services of Crystal Ludwick Photo LLC to the	18	A. Yeah, they're current.		
19	public on Crystal Ludwick Photo LLC's website?	19	THE COURT REPORTER: Like I said,		
20	A. Yes.	20	some of these don't necessarily apply.		
21	Q. Is it your regular practice to	21	THE WITNESS: Okay, sorry. It's		
22	advertise or promote the services of Crystal	22	kind of hard to follow along.		
23	Ludwick Photo LLC on Crystal Ludwick Photo LLC's	23	Q. Did you or someone acting on behalf		
24	website?	24	of Crystal Ludwick Photo LLC write the		
25	A. Yes.	25	statements contained in Exhibit A?		
	14		16		
1	Q. Is it your regular practice to	1	A. Yes.		
2	create content for Crystal Ludwick Photo LLC's	2	Q. Approximately when were the		
3	website?	3	statements in Exhibit A posted on the "About"		
4	A. Yes.	4	page of Crystal Ludwick Photo LLC's website?		
5	Q. Does this include writing and	5	A. In the past one to two years.		
6	updating the "About" page, the "Price" page, and	6	Q. Exhibit A, page 1 states: "I		
7	the "Wedding" page of Crystal Ludwick Photo	7	identify as LGBTQ+, and pride myself on being		
8	LLC's website?	8	inclusive and open to any type of couple,		
9	A. Yes.	9	regardless of who they love." Is this a true		
10	Q. Are visitors to Crystal Ludwick	10	and accurate statement?		
11	Photo LLC's website allowed to post comments	11	A. Yes.		
12	anywhere?	12	Q. Exhibit A, pages 1 and 2 states: "I		
13	A. I would have to check, possibly	13	am the co-founder of a non-profit organization		
14	under my blog section, but shouldn't be under	14	called the Fair Event Vendors Alliance (FEVA),		
15	any other section.	15	which is aimed at connecting the LGBTQ+		
16	Q. Other than the comments by visitors	16	community with wedding and event vendors in our		
17	to Crystal Ludwick Photo LLC's website, do you	17	area who stand for fairness and welcome LGBTQ+		
18	dictate and control the contents on Crystal	18	clients." Is this a true and accurate		
19	Ludwick Photo LLC's website?	19	statement?		
20	A. Yes.	20	A. Yes.		
21	Q. Does Crystal Ludwick Photo LLC	21	Q. Are the statements contained in		
22	maintain its website, including the "About"	22	Exhibit A, discussing the services you provide,		
23	page, the "Price" page, and the "Wedding" page	23	true and accurate statements about the services		
24	in the ordinary course of its business activity?	24	that you actually provide?		
25	A. Yes.	25	A. Yes.		

	March 3		
	17		19
1	THE COURT REPORTER: The next	1	that you actually provide?
2	question is "If not, please identify which	2	A. Yes.
3	statements do not accurately reflect the	3	THE COURT REPORTER: The next
4	services that you or Crystal Ludwick Photo LLC	4	question is "If not, please identify which
5	actually provide." But that doesn't apply.	5	statements do not accurately reflect the
6	Correct?	6	services that you or Crystal Ludwick Photo LLC
7	A. Correct.	7	actually provide."
8	O. Are the statements contained in	8	That's not relevant.
9	Exhibit A, discussing the services you have	9	Correct?
10	provided in the past, true and accurate	10	A. Correct.
11	statements about the services that you actually	11	Q. Please take a look at Exhibit C,
12	provided?	12	pages 1–5.
13	A. Yes.	13	A. All right.
14	THE COURT REPORTER: The next	14	Q. Are these pages true and accurate
15	question is "If not, please identify which	15	copies of the current "Wedding" page of Crystal
16	statements do not accurately reflect the	16	Ludwick Photo LLC's website?
17	services that you or Crystal Ludwick Photo LLC	17	A. Yes.
18	have actually provided in the past."	18	(Whereupon, the referred to
19	Q. Please take a look at Exhibit B,	19	document was marked as Exhibit C,
20	pages 1–3. Are these pages true and accurate	20	and is attached hereto and made a
21	copies of the current "Price" page of Crystal	21	part hereof.)
22	Ludwick Photo LLC's website?	22	THE COURT REPORTER: The next
23	THE COURT REPORTER: Did you	23	question is "If these pages are not true and
24	answer? Sorry. I didn't hear you. Sorry.	24	correct copies of the current "Wedding" page of
25	Okay.	25	Crystal Ludwick Photo LLC's website, are they
	5.mj.		eryour Eddinion rates alle a weeking une may
	18		20
1	A. Yes.	1	true and correct copies of a former "Wedding"
2	(Whereupon, the referred to	2	page of Crystal Ludwick Photo LLC's website?"
3	document was marked as Exhibit B,	3	That doesn't apply.
4	and is attached hereto and made a	4	Correct?
5	part hereof.)	5	A. Correct.
6	THE COURT REPORTER: The next	6	Q. Did you or someone acting on behalf
7	question is "If these pages are not true and	7	of Crystal Ludwick Photo, LLC create the
8	correct copies of the current "Price" page of	8	photographs contained in Exhibit C for couple's
9		1 ^	
1.0	Crystal Ludwick Photo LLC's website, are they	9	weddings?
10	true and correct copies of a former "Price" page	10	weddings? A. Yes.
11	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?"	10 11	weddings? A. Yes. Q. Did you or someone acting on behalf
11 12	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current.	10 11 12	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the
11 12 13	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct?	10 11 12 13	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the
11 12 13 14	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes.	10 11 12 13 14	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website
11 12 13 14 15	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf	10 11 12 13 14 15	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine
11 12 13 14 15 16	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the	10 11 12 13 14 15 16	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC?
11 12 13 14 15 16	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B?	10 11 12 13 14 15 16 17	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes.
11 12 13 14 15 16 17	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes.	10 11 12 13 14 15 16 17 18	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC
11 12 13 14 15 16 17 18	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the	10 11 12 13 14 15 16 17 18 19	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the
11 12 13 14 15 16 17 18 19 20	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price"	10 11 12 13 14 15 16 17 18 19 20	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in
11 12 13 14 15 16 17 18 19 20 21	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price" page of Crystal Ludwick Photo LLC's website?	10 11 12 13 14 15 16 17 18 19 20 21	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C in the ordinary course of
11 12 13 14 15 16 17 18 19 20 21	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price" page of Crystal Ludwick Photo LLC's website? A. In the past year.	10 11 12 13 14 15 16 17 18 19 20 21 22	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C in the ordinary course of business?
11 12 13 14 15 16 17 18 19 20 21 22 23	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price" page of Crystal Ludwick Photo LLC's website? A. In the past year. Q. Are the statements contained in	10 11 12 13 14 15 16 17 18 19 20 21 22 23	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C in the ordinary course of business? A. Yes.
11 12 13 14 15 16 17 18 19 20 21 22 23 24	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price" page of Crystal Ludwick Photo LLC's website? A. In the past year. Q. Are the statements contained in Exhibit B, discussing the services you provide,	10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C in the ordinary course of business? A. Yes. Q. Please take a look at Exhibit D,
11 12 13 14 15 16 17 18 19 20 21 22 23	true and correct copies of a former "Price" page of Crystal Ludwick Photo LLC's website?" You said they are current. Correct? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC write the statements contained in Exhibit B? A. Yes. Q. Approximately when were the statements in Exhibit B posted on the "Price" page of Crystal Ludwick Photo LLC's website? A. In the past year. Q. Are the statements contained in	10 11 12 13 14 15 16 17 18 19 20 21 22 23	weddings? A. Yes. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC write the statements contained on the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C as a routine part of operating Crystal Ludwick Photo, LLC? A. Yes. Q. Does Crystal Ludwick Photo, LLC maintain the "About," the "Price," and the "Wedding" pages on its website identified in Exhibits A, B, and C in the ordinary course of business? A. Yes.

		50, 202	
	21		23
1	A. One through what?	1	Q. Please take a look at Exhibit F,
2	THE COURT REPORTER: Twelve.	2	pages 1–9. Are these pages true and accurate
3	A. Okay.	3	copies of wedding photographs currently on
4	(Whereupon, the referred to	4	Crystal Ludwick Photo LLC's website?
5	document was marked as Exhibit D,	5	A. Yes.
6	and is attached hereto and made a	6	(Whereupon, the referred to
7	part hereof.)	7	document was marked as Exhibit F,
8	Q. Are these pages true and accurate	8	and is attached hereto and made a
9	copies of wedding photographs currently on	9	part hereof.)
10	Crystal Ludwick Photo LLC's website?	10	Q. If these pages are not true and
11	A. Yes.	11	accurate copies of wedding photographs currently
12	THE COURT REPORTER: The next	12	on Crystal Ludwick Photo LLC's website, are they
13	question is "If these pages are not true and	13	true and correct copies of photographs that were
14	accurate copies of wedding photographs currently	14	previously on Crystal Ludwick Photo LLC's
15	on Crystal Ludwick Photo LLC's website, are they	15	website?
16	true and correct copies of photographs that were	16	THE COURT REPORTER: You said these
17	previously on Crystal Ludwick Photo LLC's	17	are current.
18	website?"	18	Correct?
19	But you said they are current.	19	A. Correct.
20	Correct?	20	Q. Did you or someone acting on behalf
21	A. Correct.	21	of Crystal Ludwick Photo, LLC create these
22	Q. Did you or someone acting on behalf	22	photographs?
23	of Crystal Ludwick Photo, LLC create these	23	A. Yes.
24	photographs?	24	Q. Please take a look at Exhibit G,
25	A. Yes.	25	pages 1–11. Are these pages true and accurate
	12 100		L.8
	22		24
1		1	
1 2	Q. Please take a look at Exhibit E,	1 2	24 copies of wedding photographs on Crystal Ludwick Photo LLC's website?
	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate		copies of wedding photographs on Crystal Ludwick
2	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on	2	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes.
2	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website?	2	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to
2 3 4	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can	2 3 4	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes.
2 3 4 5	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them.	2 3 4 5	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a
2 3 4 5 6	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes.	2 3 4 5 6	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.)
2 3 4 5 6 7	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to	2 3 4 5 6 7	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf
2 3 4 5 6 7 8	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E,	2 3 4 5 6 7 8	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these
2 3 4 5 6 7 8	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a	2 3 4 5 6 7 8	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf
2 3 4 5 6 7 8 9	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.)	2 3 4 5 6 7 8 9	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes.
2 3 4 5 6 7 8 9 10	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next	2 3 4 5 6 7 8 9 10	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have
2 3 4 5 6 7 8 9 10 11	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and	2 3 4 5 6 7 8 9 10 11 12	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes.
2 3 4 5 6 7 8 9 10 11 12	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently	2 3 4 5 6 7 8 9 10 11 12 13	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they	2 3 4 5 6 7 8 9 10 11 12 13 14	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal
2 3 4 5 6 7 8 9 10 11 12 13 14 15	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were	2 3 4 5 6 7 8 9 10 11 12 13 14 15	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?"	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current. Correct?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo LLC's Instagram page?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current. Correct? A. Correct.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo LLC's Instagram page? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current. Correct? A. Correct. Q. Did you or someone acting on behalf	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Besides comments by visitors, do
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current. Correct? A. Correct. Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Besides comments by visitors, do you control or dictate the materials posted to
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. Please take a look at Exhibit E, pages 1–16. Are these pages true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website? THE COURT REPORTER: And you can take your time to look through all of them. A. Yes. Yes. (Whereupon, the referred to document was marked as Exhibit E, and is attached hereto and made a part hereof.) THE COURT REPORTER: The next question is "If these pages are not true and accurate copies of wedding photographs currently on Crystal Ludwick Photo LLC's website, are they true and correct copies of photographs that were previously on Crystal Ludwick Photo LLC's website?" You said these are current. Correct? A. Correct. Q. Did you or someone acting on behalf	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	copies of wedding photographs on Crystal Ludwick Photo LLC's website? A. Yes. (Whereupon, the referred to document was marked as Exhibit G, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Crystal Ludwick Photo, LLC create these photographs? A. Yes. Q. Does Crystal Ludwick Photo LLC have an Instagram page? A. Yes. Q. Are you familiar with Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Do you advertise or promote your services to the public on Crystal Ludwick Photo LLC's Instagram page? A. Yes. Q. Besides comments by visitors, do

	March 30, 2021				
	25		27		
1	Q. Please take a look at Exhibit I,	1	photographs contained in Exhibit I?		
2	pages 1-8. Are the screenshots contained in	2	A. Yes.		
3	Exhibit I true and accurate copies of portions	3	Q. Are you a co-founder of the Fair		
4	of Crystal Ludwick Photo LLC's current Instagram	4	Event Vendors Alliance?		
5	page?	5	A. Yes.		
6	A. Yes.	6	Q. Are you on the board or leadership		
7	(Whereupon, the referred to	7	team of the Fair Event Vendors Alliance?		
8	document was marked as Exhibit I,	8	A. No.		
9	and is attached hereto and made a	9	Q. Are you a founding member of the		
10	part hereof.)	10	Fair Event Vendors Alliance?		
11	Q. If not, are the screenshots	11	A. Yes.		
12	contained in Exhibit I true and accurate copies	12	Q. Could you describe the purpose of		
13	of portions of posts that previously appeared on	13	the Fair Event Vendors Alliance?		
14	Crystal Ludwick Photo LLC's Instagram page?	14	A. It's to provide a directory of		
15	THE COURT REPORTER: You said these	15	wedding and event vendors in Louisville and		
16	are current.	16	Southern Indiana for inclusive vendors for		
17	Correct?	17	the LGBTQ+ community.		
18	A. Correct.	18	Q. Does the Fair Event Vendors		
19	Q. Did you or someone acting on behalf	19	Alliance have a website accessible at this		
20	of Crystal Ludwick Photo LLC write the Instagram	20	address: http://www.fairvendors.org/?		
21	posts in Exhibit I attributable to Crystal	21	A. Yes.		
22	Ludwick Photo LLC?	22	Q. Are you familiar with the website?		
23	A. Yes.	23	A. As of recently, no.		
24	Q. When did you or someone acting on	24	Q. Do you help to support the website?		
25	behalf of Crystal Ludwick Photo LLC write the	25	A. Not anymore, no.		
	•		,		
	26		28		
1	statements contained in Exhibit I?	1	O. Are the contents of the website		
2	A. Well, it looks like 2015 was maybe	2	Q. Are the contents of the website attributable to the Fair Event Vendors Alliance		
3	the earliest one, so	3	and its members?		
4	THE COURT REPORTER: Were you	4	A. Yes.		
5	finished with that answer?	5	O. Please take a look at Exhibit J.		
6	A. Yeah, yeah, yeah.	6	Is Exhibit J a true and accurate copy of the		
7		7	"Welcome" page of the Fair Event Vendors		
8	Q. Is it your regular business practice to create posts like these about your	8	Alliance's website?		
9	photography services for Crystal Ludwick Photo	9	A. I wouldn't know be cause I haven't		
10	LLC's Instagram page?	10	been on the website in a long time.		
11	A. Yes.	11	(Whereupon, the referred to		
12	Q. Does Crystal Ludwick Photo LLC	12	document was marked as Exhibit J,		
13	maintain its Instagram page and all of the	13	and is attached hereto and made a		
14	contents on the Instagram page attributable to	14	part hereof.)		
15	Crystal Ludwick Photo LLC, in the ordinary	15	Q. Page 2 of Exhibit J states: "Fair		
16	course of its business activity?	16	Event Vendors Alliance TM aims to connect the		
17	A. Yes.	17	LGBTQ community with Louisville and Southern		
18		18	Indiana area wedding and event professionals,		
19	Q. Are the photographs contained in Exhibit I true and accurate copies of	19	who welcome them as clients and believe in their		
20		20	equality and fair treatment. FEVA also desires		
21	photographs of a wedding that you photographed or someone acting on behalf of Crystal Ludwick	21	to promote the growth and professional		
22	Photo LLC photographed?	22	development of that community of support in		
23		23	Louisville and Southern Indiana. On our		
24		24	website, you will find the section Directory		
25	Q. Did you or someone acting on behalf of Crystal Ludwick Photo LLC create all of the	25	which provides a listing by category of our		
2.5	of Crystal Eddwick I note LEC create all of the		which provides a listing by category of our		
1		1			

26 2.13-CA-00021-D1D-CUL	Ducument 92-1	LIIGO 03/01/51	Page ZII UI 303 Pa
	34yst	al Ludwick	_
	Marc	h 30, 2021	

	IVIAIOIT	,	•
	29		31
1	members who offer a wide variety of goods and	1	Fair Event Vendors Alliance?
2	services from formal wear to venues." Is this a	2	A. I mean, can I say more than yes,
3	true and accurate statement?	3	no, I don't know, because, I mean, I guess I'm
4	A. Yes.	4	technically still a member of FEVA, but and I
5	Q. Does the Fair Event Vendors	5	did help, you know, found it, and I was I
6	Alliance have a directory of vendors who provide	6	used to be on the board, but I'm not anymore and
7	wedding or other event services?	7	I haven't paid dues, so technically I wouldn't
8	A. Yes.	8	be a member, so I can't really speak on their
9	Q. Approximately how many vendors are	9	behalf.
10	members of the Fair Event Vendors Alliance?	10	Q. Exhibit L page 2 lists "Criteria
11	A. I do not know.	11	for Involvement." Are these true and accurate
12	Q. Approximately how many	12	criteria used to determine membership in Fair
13	photographers are members of the Fair Event	13	Event Vendors Alliance?
14	Vendors Alliance?	14	A. Yes.
15	A. I do not know.	15	Q. Approximately when was the content
16	Q. Please take a look at Exhibit K,	16	in Exhibits J, K, and L posted to the Fair Event
17	pages 1-15.	17	Vendors Alliance's website?
18	THE COURT REPORTER: And I'll go	18	A. Sometime in the past ten years. I
19	ahead and ask the question so you know as you	19	can't be sure.
20	look through it.	20	Q. Was the content in Exhibits J, K,
21	Q. Is Exhibit K a true and accurate	21	and L created by the Fair Event Vendors Alliance
22	copy of the current directory of photographers	22	during the normal course of operating this
23	on the Fair Event Vendors Alliance's website?	23	organization?
24	A. I do not know.	24	A. Yes.
25	11. I do not know.	25	Q. Does the Fair Event Vendors
23			Q. Boes the Fair Event Vendors
	30		32
1	(Whereupon, the referred to	1	Alliance maintain the content on its website,
2	document was marked as Exhibit K,	2	including the content in Exhibits J, K, and L,
3	and is attached hereto and made a	3	in the ordinary course of its business activity?
4	part hereof.)	4	A. Yes.
5	Q. If not, is Exhibit K a true and	5	Q. Excluding comments by visitors to
6	correct copy of a previous directory of	6	your website, Instagram has any material been
7	photographers on the Fair Event Vendors	7	posted on Crystal Ludwick Photo LLC's website
8	Alliance's website?	8	that inaccurately describes the services that
9	A. Yes.	9	Crystal Ludwick Photo LLC offers to the public?
10	Q. Please take a look at Exhibit L.	10	If so, describe that material and how it is
11	•	11	inaccurate.
12	Is Exhibit L a true and accurate copy of the	12	A. No.
13	current "Joining" page of the Fair Event Vendors Alliance's website?		
14		13	Q. Have you ever knowingly had to
	A. I do not know.	14	modify how you operate your business in order to
15 16	(Whereupon, the referred to	15	comply with Metro Ordinance 92.05, attached as
16	document was marked as Exhibit L,	16	Exhibit H? If so, how?
17	and is attached hereto and made a	17	A. Can you repeat the question?
18	part hereof.)	18	THE COURT REPORTER: Sure.
19	Q. If not, is Exhibit L a true and	19	(Whereupon, the referred to
20	correct copy of a previous "Joining" page of the	20	document was marked as Exhibit H,
21	Fair Event Vendors Alliance's website?	21	and is attached hereto and made a
22	A. Yes.	22	part hereof.)
22	O Evhibit I magaz 1 2 lists "Farm	. 33	45 11 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

Q. Have you ever knowingly had to

modify how you operate your business in order to

comply with Metro Ordinance 92.05, attached as

23

24

Exhibit L pages 1-2 lists "Four

true and accurate statements attributable to

Reasons Why You Should Join FEVA!" Are these

23

24

25

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```
33
 1
       Exhibit H? If so, how?
 2
           A. No, because I don't discriminate.
 3
               THE COURT REPORTER: Okay. Those
 4
       are all the questions. Thank you.
 5
               THE WITNESS: Thank you.
 6
 7
 8
                (Witness Excused.)
 9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
                                                     34
       STATE OF KENTUCKY )
 1
                    ) SS.
 2
       COUNTY OF JEFFERSON )
 3
             I, JESSICA TAYLOR ROSS, a Notary
 4
       Public within and for the State at Large, do
 5
       hereby certify that the foregoing deposition was
 6
       taken before me, via Zoom, at the time and for
 7
       the purpose in the caption stated; that the
 8
       witness was first duly sworn to tell the truth,
 9
       the whole truth and nothing but the truth; that
10
       the deposition was reduced to digital shorthand
11
       and recorded by me in the presence of the
12
       witness; that the foregoing is a full, true and
13
       correct transcript of my digital notes and
14
       recording; that there was no request that the
15
       witness read and sign this deposition; that the
16
       appearances were as stated in the caption.
17
18
             WITNESS MY SIGNATURE this 8th day of
19
       April, 2021.
20
             My commission expires July 21, 2022.
21
               /s/ Jessica T. Ross
22
               JESSICA TAYLOR ROSS
               Court Reporter
23
               Notary Public, State At Large
               Notary ID 602031
24
       V/JR-P
25
```

CRYSTAL LUDWICK

HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG

Hey there, potential new client, collab partner or lifelong friend! You have come here to get to know me & to see if we jive, so let's dive in!

I obviously love tattoos, sci-fi everything (Trekky for life), animals have my heart (ferret mama), green spaces including the ones I create in my home, sober livin,' kombucha and planning my next adventure! I identify as LGBTQ+, and pride myself on being inclusive and open to any type of couple, regardless of who they love, skin color, faith, gender identity, body type or physical ability. My pronouns are she/her and I'd love to know yours.

I have been photographing weddings and families for seven years and I hold a BFA in Fine Art Photography & a BA in Cultural Anthropology from the University of Louisville. While I am based out of Louisville, Kentucky, I love to travel & shoot adventure elopements or micro-weddings in epic locations, where we hike to our ceremony spot and bond along cliff sides and muddy boots! Join me in 2020 in these rad spots: Costa Rica, Banff, Canada, the Faroe Islands and Scotland.

Being civically engaged is an important part of who I am and how I connect to my local community. I'm currently serving as a mentor for the Louisville Youth Group

(louisvilleyouthgroup.org) and I am the co-founder of a non-profit organization called the Fair Event







Vendors Alliance (FEVA), which is aimed at connecting the LGBTQ+ community with wedding and event vendors in our area who stand for fairness and welcome LGBTQ+ clients (www.fairvendors.org.).

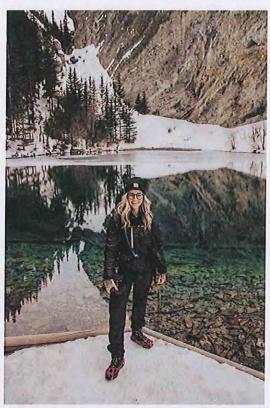
I would love the opportunity to get to know you and create something special together. For a quote or to set up a meeting, please email me at: crystalraeludwick@gmail.com

lesses to the Heart of Vertilation

CONTACT ME









Chaid Lavid Phop I C O W Kight



Exhibit B

Price — Crystal Ludwick Photo

CRYSTAL LUDWICK

PHOTO

HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG



2022 WEDDINGS \$3600-\$3800

9 HOURS
50% RETAINER REQUIRED TO BOOK
PRINTING & SOCIAL MEDIA RIGHTS

CONTACT ME



2022 KY ELOPEMENTS

2 HOURS MIN-6 HOURS MAX 40 MAX GUEST COUNT \$425 PER HOUR



Price — Crystal Ludwick Photo

CONTACT ME



2022 ENGAGEMENT, FAMILY & MATERNITY

I LOCATION, OUTFIT, HOUR \$350
2 LOCATIONS, OUTFITS, HOURS \$450
50% NON-REFUNDABLE DEPOSIT REQUIRED
MAX 5 PEOPLE

CONTACT ME



2022 NEWBORN:

\$450 2 HOURS

LIFESTYLE: NOT SUPER POSED

1-2 LOCATIONS

50% NON-REFUNDABLE DEPOSIT REQUIRED

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Price — Crystal Ludwick Photo



Don't see what you are looking for on this list? No prob!

EMAIL ME AT

CRYSTALRAELUDWICK@GMAILCOM

CONTACT ME

Crystal Ludwick Photo, LLC. ©2021-2022





CRYSTAL LUDWICK

HOME WEDDING FAMILY COUPLES ABOUT PRICE



Red River Gorge Styled Shoot



Deanna & Audrey



Marlowo & Cory



Styled Shoot The Foundry on Broadway Frankfort, Ky



Catherine & David



Jason & Jay



Ellen & Lee



Kelsey & Daniel

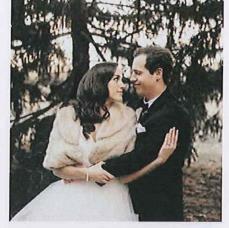


Katie & Brad



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Ellie & Logar



McKenzie & Colby



Emily & G



Hannah & Luc



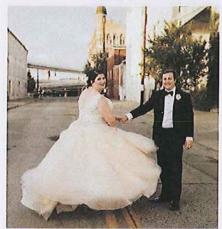
Beth & Bobby



Lauren & Ryan

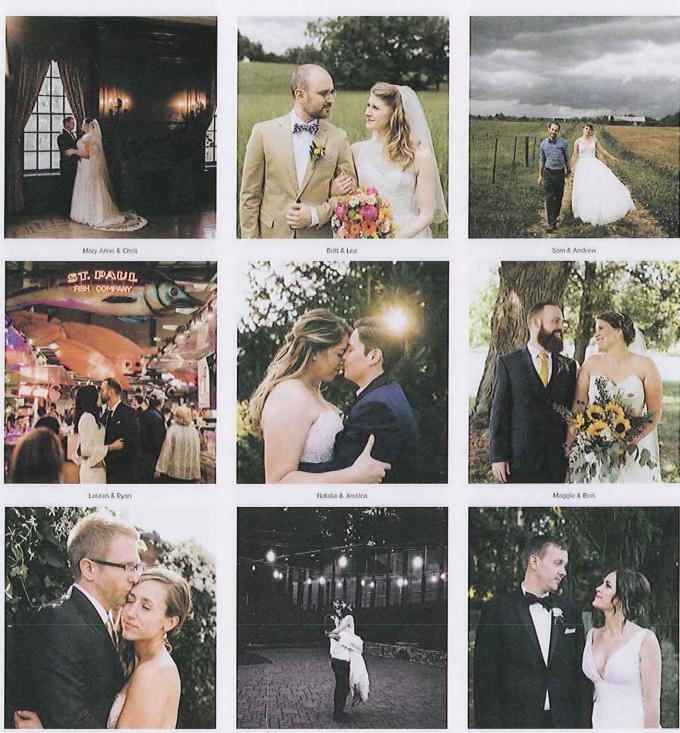


Haylee & Nick



Andy & Grace

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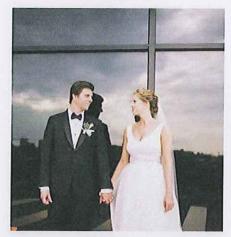


Kate & Jordan

Kirston & Matt

Morgan & Daniel

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Elizabeth & Brandon



Emily & Joe



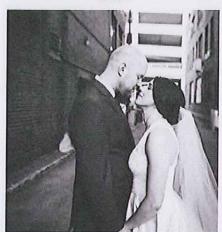
Kate & Mik



Stephanie & Ashleigi



Abby & Tyle



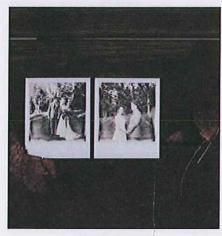
Megan & Josh



Carrio & Pete



Colleon & Jim



Emity & Bon Ceremony

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Jill & Mott



Emilia & Chris



Scott & Josie

Crystal Ludwick Photo LLC

0200 202

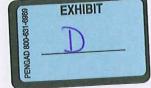




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2/25/2021

Wedding - Crystal Ludwick Photo



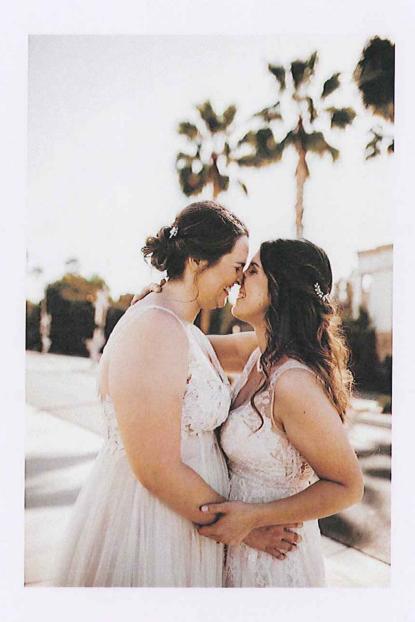


HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG

DEANNA & AUDREY

Orange County, California









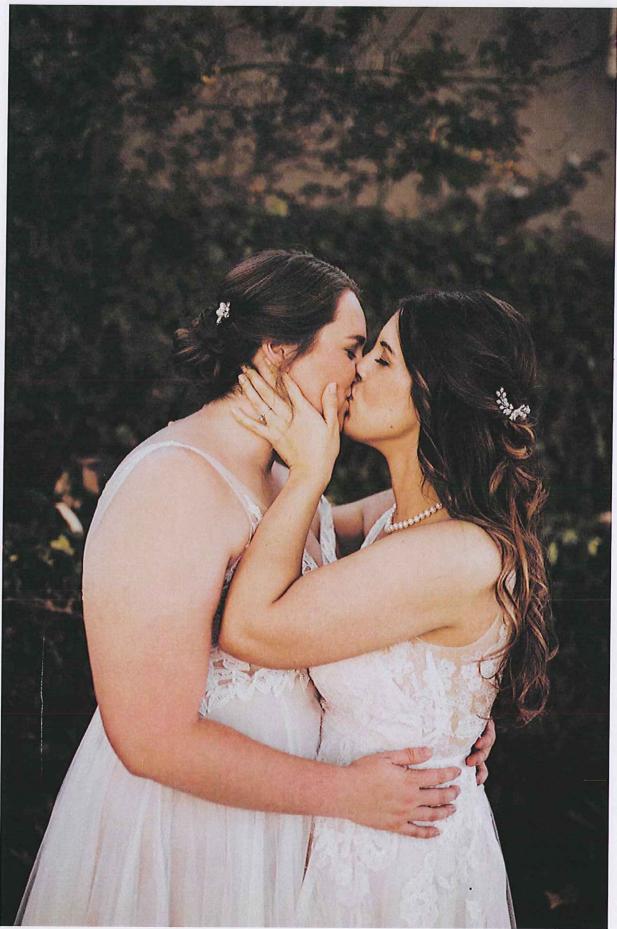


Wedding — Crystal Ludwick Photo



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Wedding — Crystal Ludwick Photo



2/25/2021

Wedding — Crystal Ludwick Photo



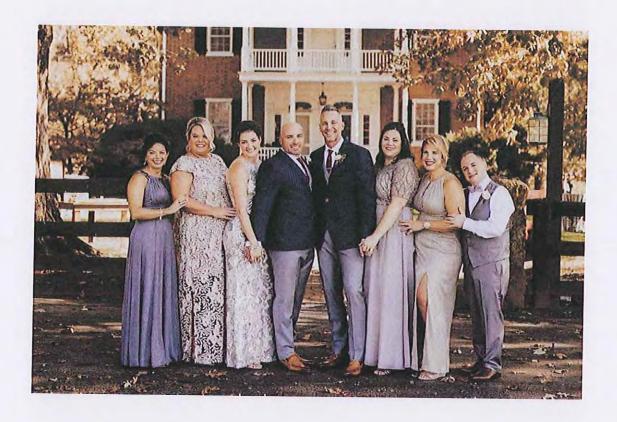
HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG

JASON & JAY

HERMITAGE FARM, GOSHEN, KY WEDDING













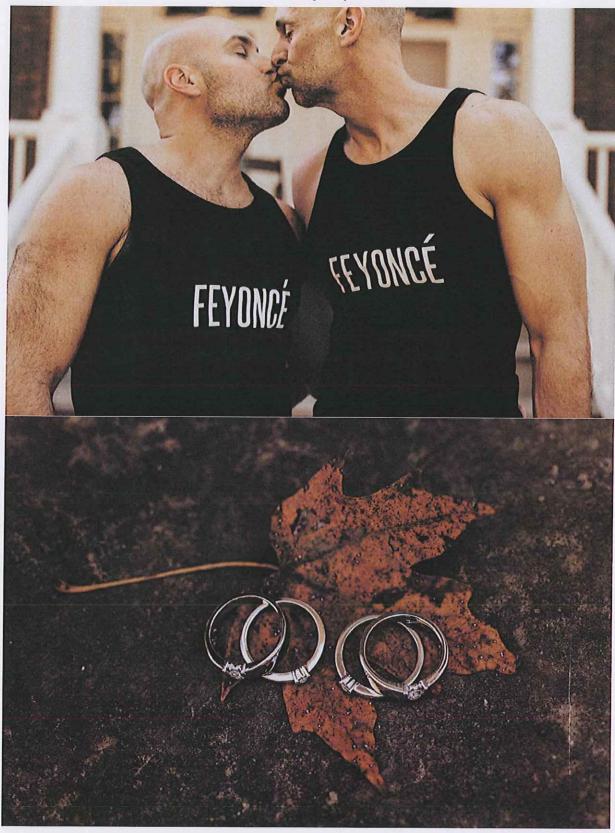






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Wedding — Crystal Ludwick Photo



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Wedding - Crystal Ludwick Photo



HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG

McKenzie & Colby 2017

Kentucky Science Center, Louisville, Kentuckyln bloom for flowers

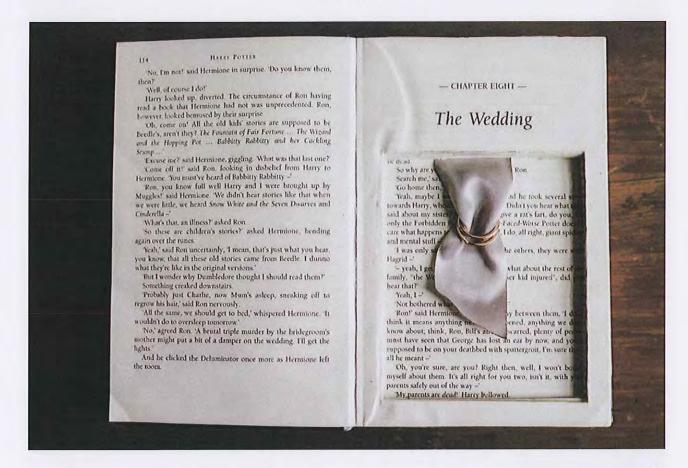
In Bloom Again, Florals

Wiltshire, Catering

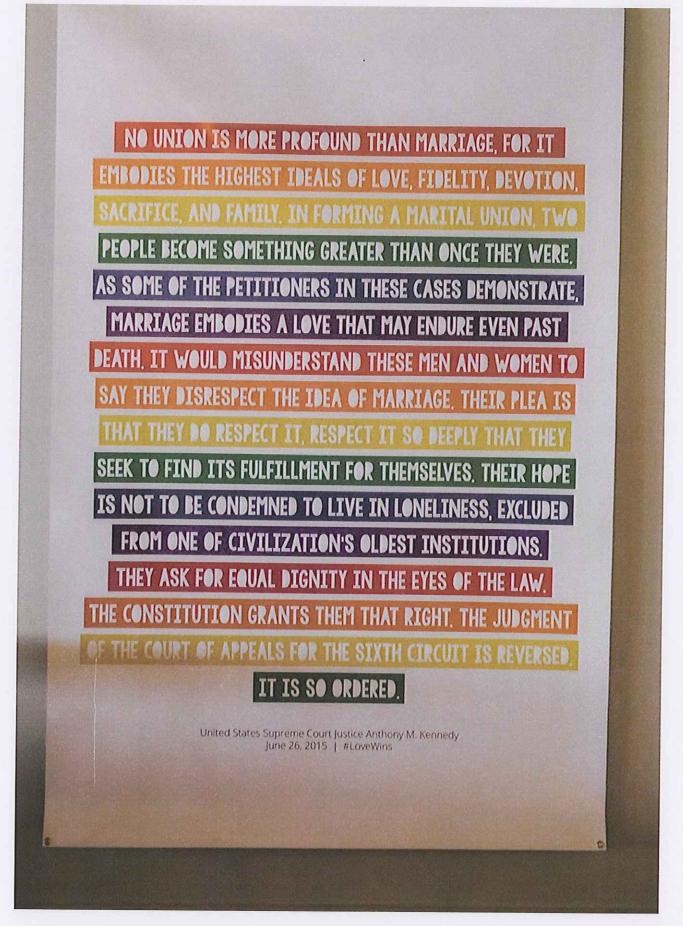
Triangle talent, DJ

Flour de Lis Bakery, cake

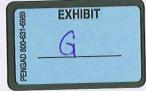
Ann DeEvelyn, Suit







Wedding — Crystal Ludwick Photo



CRYSTAL LUDWICK

PHOTO

HOME WEDDING FAMILY COUPLES ABOUT PRICE BLOG

GUTHRIE & JOHN RUSSELL

LOUISVILLE, KY

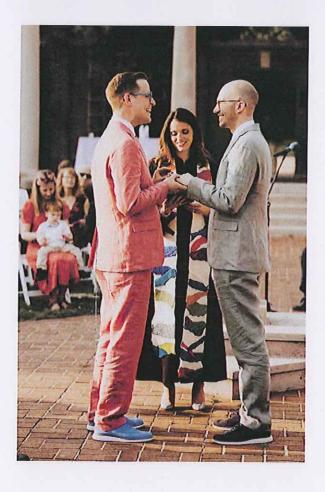


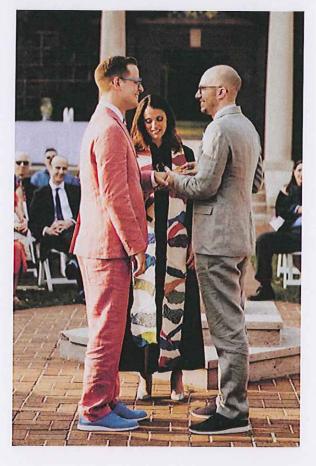
CNP MSJ 00571 www.crystalludwickphoto.com/wedding#/guthrie-john-russell/

Ludwick Ex. G 001

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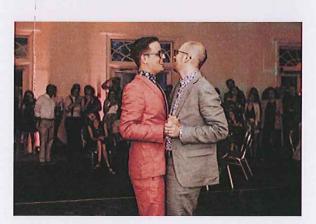
Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 246 of 565 PageID #: 3478

























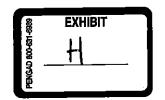
3/1/2021

https://export.amlegal.com/api/export-requests/1b21e8f7-8afb-4365-9cb8-263d96698ac7/download/

§ 92.05 UNLAWFUL PRACTICES IN CONNECTION WITH PUBLIC ACCOMMODATIONS.

- (A) Except as otherwise provided herein, it is an unlawful practice for a person to deny an individual the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation, resort or amusement as defined in § 92.02, on the ground of race, color, religion, national origin, disability, sexual orientation or gender identity.
- (B) It is an unlawful practice for a person, directly or indirectly, to publish, circulate, issue, display, or mail, or cause to be published, circulated, issued, displayed, or mailed, a written, printed, oral or visual communication, notice, or advertisement, which indicates that the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation, resort or amusement, will be refused, withheld, or denied an individual on account of his race, color, religion, national origin, disability, sexual orientation or gender identity, or that patronage of, or presence at, a place of public accommodation, resort or amusement, of an individual, on account of his race, color, religion, national origin, disability, sexual orientation or gender identity is objectionable, unwelcome, unacceptable, or undesirable.
- (C) It shall be an unlawful practice to deny an individual, because of sex, the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a restaurant, hotel, motel, or any facility supported directly or indirectly by government funds.
 - (1) The provisions of this subsection shall not apply to:
- (a) Restrooms, shower rooms, bath houses and similar facilities which are in their nature distinctly private;
 - (b) YMCA, YWCA and similar type dormitory lodging facilities;
- (c) The exemptions contained in the definitions of "Place of Public Accommodations, Resort or Amusement" set forth in § 92.02;
- (d) Hospitals, nursing homes, penal or similar facilities, to require that men and women be in the same room.

(1994 Jeff. Code, § 92.06) (Jeff. Ord. 36-1999, adopted and effective 10-12-1999) (1999 Lou. Code, § 98.05) (Lou. Ord. No. 0088-2001, 2, approved 8-16-2001; Lou. Metro Am. Ord. No. 193-2004, approved 12-10-2004)



















Fair Event Vendors Alliance

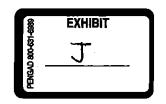


WELCOME ABOUT DIRECTORY MEMBERSHIP EVENTS
DONATION CONTACT



Welcome

Ludwick Ex. J 001



Fair Event Vendors Alliance

Fair Event Vendors AllianceTM aims to connect the LGBTQ community with Louisville and Southern Indiana area wedding and event professionals, who welcome them as clients and believe in their equality and fair treatment. FEVA also desires to promote the growth and professional development of that community of support in Louisville and Southern Indiana. On our website, you will find the section Directory which provides a listing by category of our members who offer a wide variety of goods and services from formal wear to venues.





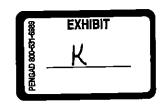


WELCOME ABOUT DIRECTORY MEMBERSHIP EVENTS
DONATION CONTACT

Photography



ChocolateBox Photography



Photography & Video — Fair Event Vendors Alliance

General Member

Owner: Natalia Bishop

Established: 2010

Services: Documentary photography for awesome families and couples in love. "The best portion of your life will be the small, nameless moments you spend smiling with someone who means everything to you"

Member Statement: "I am a FEVA member because I believe marriage to be about love and commitment, I believe equality and fairness and more importantly I believe in the importance of documenting our memories and our legacy. I look forward to seeing our Louisville community flourish into a place of inclusion and fair treatment of all couples in love!"

Contact: Natalia Bishop

Phone: (502)

Email: @chocolateboxphoto.com

Website: www.chocolateboxphoto.com

Social Media Links:

https://www.facebook.com/chocolateboxphotography

http://instagram.com/chocolateboxphotography



Photography & Video — Fair Event Vendors Alliance

Crystal Ludwick Photo LLC

Founding Member

Owner: Crystal Ludwick

Established: 2014

Services: Louisville based photographer focusing on weddings, engagements/couples, pregnancy & children, with a fine art background. Loves getting to know the client on a personal level, which compliments the photographs. Never pushy or rushed; it's about the photo, not the finances.

Member Statement: "Fairness is a term to live by and can one day be the "norm". Let's defy social negativity and continue to progress as equal businesses, clients and partners."

Contact: Crystal Ludwick

Email: @gmail.com

Website: crystalludwickphoto.com

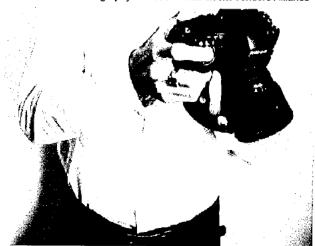
Social Media Links;

instagram.com/crystalludwickphoto

https://www.facebook.com/crystalludwickphoto/



Photography & Video - Fair Event Vendors Alliance



First Light Image

General Member

Creative photography bringing your memories to light!

Owner: Andrew J. McCawley

Established: 2013

Services: To produce not just the highest quality images but the most authentic and most inspiring, FLI places focus on the creative process and being open to possibilities. There is 10 years professional experience and a background in fine art driving every project to completion. The aim is to make your First Light experience as much a memory and inspiration as the images it creates.

Member Statement: "I love what I do, which is essentially creating happiness and satisfaction through photographs for my clients that will serve as joyous memories or tools to help their business and passions grow. These are things We All seek, things that connect us and things I'd like to continue bringing to everyone the best I can."

Contact: Andrew J. McCawley

Phone: (502)

Email: @gmail.com

Website: http://www.firstlightimage.net

Social Media Links:

Pholography & Video --- Fair Event Vendors Alliance

https://www.facebook.com/FirstLightImage/



Gary Barragan Photography

General Member

Owners: Gary Barragan

Established: 2013

Services:

Gary Barragan is a recognized and talented headshot and portrait photographer. Gary has earned a reputable name in fashion and film circles where he honed his editorial infused style, while his laid-back demeanor makes him a favorite with his headshot and portrait clients. His love for the art of image making has cemented a pathway for him tell countless stories and create continued success for his clients over the years.

Member Statement: "I'm a firm believer in live and let live, so I feel everyone has the humanly right to happiness and living their life with the soul mate as they please. With that, I think it's critical to equality that there are community members who will use their talents to capture those lives."

Contact: Gary Barragan

Phone: (502)

Email: @garybarragan.com



Photography & Video - Fair Event Vendors Alliance

Website: www.garybarragan.com

Social Media Links:

https://www.instagram.com/photobygaryb/

https://www.facebook.com/garybarragan?fref=ts&ref=br tf

https://twitter.com/search?q=photobygaryb&src=typd



Jess Amburgey Photography

General Member

Be seen.

Owner: Jess Amburgey

Established: 2015

Services: I offer photography, social media marketing, and graphic design services. With a passion for promoting inclusiveness in the advertising world, I believe we all deserve to be seen, and to feel valuable, uplifted, and worthy. From businesses to individuals and families, to animals, to cherished moments, or taking a leap towards a dream - my mission is to capture and showcase YOUR truth no matter your gender identification, sexual orientation, ability, race, or socioeconomic status.

Member Statement: "Each client has a uniqueness and beauty that deserves to be highlighted and have their



Photography & Video — Fair Event Vendors Alliance

remarkable light brought to the surface; to be seen."

Contact: Jess Amburgey

Phone: (502)

Email: @gmail.com

Website: www.jessamburgey.com/

Social Media Links:

https://www.facebook.com/jessamburgeyphotography/

https://www.instagram.com/jess.amburgey/



Kriech-Higdon Photography

Founding Member

Owners: Jessie Kriech-Higdon & Chris Higdon

Established: 2005

Services: Based in Louisville, Kentucky and servicing Lexington and Indianapolis, we are a husband-and-wife team specializing in wedding, lifestyle, family, portraits, and baby photography. From your engagement to your first baby, we've got you covered.

Member Statement: "We're a part of FEVA because love is love! And everyone deserves to have those moments



Ludwick Ex. K 007

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captured- weddings, kiddos and more!"

Contact: Jessie Kriech-HIgdon

Phone: (502)

Email: @kriechphoto.com

Website www.kriech-higdonphoto.com

Social Media Links:

https://www.facebook.com/pages/Kriech-Higdon-Photography/120331627980140?ref=hl



Lauren Alexandra Photography

General Member

Owners: Lauren Alexandra Wessel



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Established: 2017

Services: I am a full-time Louisville, Kentucky based photographer with a fine art background servicing Louisville, Lexington, and Cincinnati/Northern Kentucky. I have a documentary and detailed approach to photographing love, life, and everything in between.

Member Statement: "I want everyone to feel absolutely comfortable, supported, and safe with their choice of vendors. Photographing people in love is my favorite, and I want to make sure my clients are confident that I am 100% on their side."

Contact: Lauren Alexandra Wessel

Phone: (502)

Email: p

Website: https://laurenalexandra.photography/

Social Media Links:

https://www.instagram.com/laurenalexandra.photography/

https://www.facebook.com/laurenalexandrawesselphotograph y/



Love Hunters

General Member

Wanderlust photographer seeking out genuine connections between adventurous couples all over the world.



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Owner: Susan Stewart

Established: Love Hunters, est. 2016 (Formerly known as Stewart-Hunter Photography, est. 2011)

Services: Our goal is to put the emphasis on wedding photography back where it belongs: the couple's commitment to one another. We love highlighting our couples' amazing personalities and strong connections. When we aren't photographing weddings, we are shooting families, lifestyle portraits, and branding sessions for small businesses!

Member Statement: "We focus on utilizing the beautiful, powerful connections and amazing personalities our couples possess as fuel for our art. It doesn't matter to us who the intimate connection is between, if it is present, we want to document it!"

Contact: Susan Stewart

Phone: (502) \$

Email: @love-hunters.com

Website: http://love-hunters.com/

Social Media Links:

https://www.instagram.com/love_hunters/, www.facebook.com/huntandcapture



Megan Resch Photography

Photography & Video - Fair Event Vendors Alliance

General Member

Owner: Megan Resch

Established: 2005

Services: I'm based in Louisville Ky but will travel anywhere! I love documenting life's most treasured moments. I cherish being invited into your homes or to being a part of your wedding day & being given the responsibility of capturing your love.

Member Statement: "I watched a dear friend struggle for many years because he was not accepted for who he was. It broke my heart. I'm so grateful to be a part of FEVA... an organization where couples & families of all kinds can come & feel accepted. I want to document your love, your beautiful story."

Contact: Megan Resch

Phone: (502)

Email: @gmail.com

Website: www.meganresch.com

Social Media Links:

http://instagram.com/megreschphoto



Photography & Video — Fair Event Vendors Alliance

Mothwing Photography

General Member

"Kentucky-based photographer crafting wedding photos that celebrate who you are & headshots that celebrate who you want to be."

Owner: Ayna Lorenzo

Established: 2018

Services: I'm a people photographer living to make portraits that describe the real you and your relationships with the people you love most. My wedding photography is a mix of narrative photography, editorial portraiture, and gosh darn dang good fun. If you want a photographer who will really lean into storytelling, who adores people, and who will love every second of photographing your wedding, I'm your gal.

Member Statement: "I'm part of FEVA because everyone should feel loved, supported, and wholeheartedly welcomed. It's important to me to be as clear as possible about my values as both a person and as a business. Love is love, and I look forward to photographing the heck out of your love story."

Contact: Ayna Lorenzo

Email: @gmail.com

Website: www.mothwingphoto.com

Social Media Links:

https://www.instagram.com/oh.cecilia/

https://www.facebook.com/mothwingphotography/



Ludwick Ex. K 012

Photography & Video — Fair Event Vendors Alliance



Sarah Katherine Davis Photography

Founding Member

"Enthusiastically & honestly photographing adventurous, genuine love in Louisville & worldwide."

Owner: Sarah Katherine Davis

Established: 2010

Services: I love getting to tell the stories of the amazing people I work with— from wedding clients to small businesses.

Member Statement: "Everyone deserves to have quality photographs of their most important moments. Marriage is about love not orientation."

Contact: Sarah Katherine Davis

Phone: (502):

Email: @gmail.com

Website: www.sarahkatherinedavis.com

Social Media Links:

https://www.facebook.com/SarahKatherineDavisPhotography

http://instagram.com/sarahkatherinedavis

Photography & Video — Fair Event Vendors Alliance

Photography & Videography



Blair Dog

Founding Member

Owner: Josh Minogue

Established: 2010

Services: A film and photography company specializing in motion and stills. Blair Dog utilizes cinematic styling to capturing moments both planned and naturally occurring.

Member Statement: "I have too many friends and family members in this community that I care for and to not be part of a cause that strives for equality, in both my personal life and business, would be a slap in the face to them and everything I believe."

Contact: Josh Minogue

Phone: (502)

Email: @blairdog.com

Website: www.blairdog.com

Social Media Links;

Photography & Video - Fair Event Vendors Alliance

https://www.facebook.com/BlairdogMovingStories

https://vimeo.com/blairdog

https://twitter.com/BlairDogProd

http://instagram.com/blairdog/



Trent and Kendra Photography

General Member

"Helping couples feel present and in the moment on their wedding day... because everyone deserves real photos to hold dear for years to come!"

Owners: Trenton and Kendra Farris

Established: 2015

Services: Wedding, portrait and family photography and videography.

Member Statement: "It's important for us to be a part of FEVA because we believe that everyone deserves photos that document their love and their moments. We are just grateful to be a part of our client's lives!"

Contact: Kendra Farris

Joining - Fair Event Vendors Alliance



WELCOME ABOUT DIRECTORY MEMBERSHIP EVENTS
DONATION CONTACT

Joining

4 Reasons Why You Should Join FEVA!

- 1. We provide support for an underserved part of our community, who despite anti- discrimination laws and marriage equality, are still subject to discriminatory attitudes.
- 2. We are the first business league/wedding alliance in the US that's non-profit and strictly focused on advocacy by uniting as a group of wedding vendors for fairness, connecting with the LGBTQ community through events and the online directory, and providing local training opportunities in LGBTQ competency for our members.
- 3. We support and encourage the growth of the valuable LGBTQ wedding market and in doing so, enhance our local economy. In October 2015, we hosted the FIRST inclusive wedding show in the state specifically for LGBTQ guests and allies.



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2/25/2021

Joining — Fair Event Vendors Alliance

4. We are innovators within our industry and our city, equipped with a model that can be implemented in underrepresented cities throughout the country, beginning in Kentucky.

2020 Membership (\$50 annual fee)

Membership includes the following...

A profile on our website including a photo shoot, brief description of your business, a member statement and links to your website and social media

The use of our logo on your company's promotional materials and/or website to signify your status as a member and an ally

Access to workshops designed specifically to educate vendors how best to serve the LGBT community and professional networking opportunities

Criteria for Involvement

- Provide a service in the wedding industry
- Fair and equal treatment of your clients and colleagues
- In business for at least 1 year w/ references
- Professional behavior and quality service
- · Participation in at least one meeting annually
- Support at least one FEVATM fundraiser annually

Please contact Heather Yenawine (FEVA Director) at fevalouisville@gmail.com to begin the process!



2/25/2021

Joining — Fair Event Vendors Alliance





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	March 3	00, 2021	
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	UNITED STATES DISTRICT COURT WESTERN DISTRICT OF KENTUCKY LOUISVILLE DIVISION	1 2 APPEARANCES 3	
	Case No. 3-19-CV-00851-BJB-CHL	4 COUNSEL FOR PLAINTIFFS:	
	CHELSEY NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, PLAINTIFFS	6 Bryan D Neihart, Esq , AZ Bar No 035937 7 (Via Zoom videoconference) 8 ALLIANCE DEFENDING FREEDOM	
	v.	9 15100 N 90th Street 10 Scottsdale, AZ 85260 11 Telephone: (480) 444-0020	
	LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT, et al., DEFENDANTS	 12 email: bneihart@ADFlegal org 13 14 COUNSEL FOR DEFENDANT, LOUISVILLE/JEFFERSON 	
	DEPONENT: SARAH KATHERINE DAVIS DATE: MARCH 30, 2021	COUNTY METRO GOVERNMENT: 15 16 Casey L Hinkle, Esq	
	COURT REPORTER: JESSICA TAYLOR ROSS	 17 KAPLAN JOHNSON ABATE & BIRD LLP 18 710 W Main Street 19 4th Floor 	
	TAYLOR COURT REPORTING KENTUCKY	20 Louisville, KY 40202 21 dkaplan@kaplanjohnsonlaw com 22 Telephone: (502) 416-1630 23 email: chinkle@kaplanjohnsonlaw com	
	2901 SIX MILE LANE LOUISVILLE, KENTUCKY 40220	24 25	
	2		4
1 2 3		1 2 APPEARANCES 3	
4 5		4 COUNSEL FOR DEFENDANT, LOUISVILLE/JEFFERSON COUNTY METRO GOVERNMENT:	
6 7 8 9 10		5 6 Jason D Fowler, Esq 7 (Via Zoom videoconference) 8 ASSISTANT JEFFERSON COUNTY ATTORNEYS 9 531 Court Place, Suite 900	
11 12 13 14		10 Louisville, KY 40202 11 Telephone: (502) 574-6321 12 email: jason fowler@louisvilleky gov 13	
15 16 17	SARAH KATHERINE DAVIS MARCH 30, 2021	14 15 16 17	
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C	EXHIBITS PAGE Chibit A 18 Pebrite "Home" page) Chibit B 19 Pebrite "About" page) Chibit C 21 Pebrite "Prices & Rates" page) Chibit D 23 Pebrite "Frequently Asked Questions" page) Chibit E 25 Chibit F 26 Carrent 1, 2018 blog post) Chibit G 27 Chibit H 28 Chibit H 28 Chibit H 29 Covember 23, 2018 blog post) Chibit J 30 Chibit J 31 Chibit J 30 Chibit J 31 Chibit J 30 Chibit J 30 Chibit J 31 Chibit J 31 Chibit J 32 Chibit J 33 Chibit M 35 Chibit M 35	6	1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25	STIPULATIONS The remote deposition on written questions of SARAH KATHERINE DAVIS, was taken pursuant to Notice via Zoom videoconference, on Tuesday, March 30, 2021; said deposition, to be used in accordance with the Federal Rules of Civil Procedure.	

		30, 202	· · · · · · · · · · · · · · · · · · ·
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1		1	
2	INTRODUCTION	2	PROCEEDINGS
3		3	
4	THE COURT REPORTER: We're on the	4	SARAH KATHERINE DAVIS, the said
5	record. My name is Jessie Ross, the court	5	witness, called by the Plaintiffs, CHELSEY
6	reporter. I'm reporting remotely today from	6	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON,
7	Louisville, Kentucky via Zoom videoconference.	7	having been first duly sworn, was examined and
8	Counsel, please state your name and whom you	8	deposed as follows, with the court reporter
9	represent, and let us know if there is anyone	9	reading the questions:
10	else in the room with you.	10	reading the questions.
11	MR. NEIHART: Good morning. My	11	* * *
12	name is Bryan Neihart. I'm appearing on behalf	12	EXAMINATION
13	of the plaintiffs, Chelsey Nelson Photography	13	Q What is your name, age, current
14	LLC and Chelsey Nelson. I'm in my office and	14	residence address, and occupation?
15	there is no one else here.	15	A Sarah Katherine Davis I'm
16	MS. HINKLE: Casey Hinkle, attorney	16	And I live at Louisville,
17	for the defendants in this matter and there is	17	Kentucky, 40217 and that's
18	no one else present with me.	18	And I'm a photographer
19	MR. FOWLER: Jason Fowler,	19	Q Do you know any of the parties to
20	Assistant County Attorney, representing the	20	
21	defendant. No one else present in the room with	21	the above-entitled action, and if so, how long
22	me.	22	have you known such parties or party?
23	THE COURT REPORTER: Okay. I'll		A Are referring just specifically
24	now ask the witness, please state your full name	23	like Chelsey Nelson or
25	and let us know if there is anyone in the room	24	THE COURT REPORTER: Chelsey Nelson
	•	25	Photography LLC and Chelsey Nelson versus
	10		12
1	present with you.	1	Louisville/Jefferson County Metro Government, et
2			
	THE WITNESS: Sarah Katherine Davis	2	al. That is the caption for the action.
3	THE WITNESS: Sarah Katherine Davis and there is no else in the room.	2 3	-
3 4			al. That is the caption for the action.
		3	al. That is the caption for the action.A. I've only heard about the one line.
4		3 4	al. That is the caption for the action.A. I've only heard about the one line.Q. Have you discussed taking this
4 5		3 4 5	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney
4 5 6	and there is no else in the room. * * *	3 4 5 6	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County
4 5 6 7	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having	3 4 5 6 7	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government?
4 5 6 7 8	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I	3 4 5 6 7 8	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No.
4 5 6 7 8 9	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to	3 4 5 6 7 8	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up
4 5 6 7 8 9	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6).	3 4 5 6 7 8 9	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you
4 5 6 7 8 9 10	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for	3 4 5 6 7 8 9 10	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about."
4 5 6 7 8 9 10 11	and there is no else in the room. * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me?	3 4 5 6 7 8 9 10 11	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah
4 5 6 7 8 9 10 11 12	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.)	3 4 5 6 7 8 9 10 11 12 13	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography?
4 5 6 7 8 9 10 11 12 13	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you	3 4 5 6 7 8 9 10 11 12 13	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes.
4 5 6 7 8 9 10 11 12 13 14 15	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're	3 4 5 6 7 8 9 10 11 12 13 14 15	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're about to give will be the truth, the whole truth, and nothing but the truth? THE WITNESS: Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine Davis Photography? A. Yes. Q. Do you own Sarah Katherine Davis
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're about to give will be the truth, the whole truth, and nothing but the truth? THE WITNESS: Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine Davis Photography? A. Yes. Q. Do you own Sarah Katherine Davis Photography in whole or in part?
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're about to give will be the truth, the whole truth, and nothing but the truth? THE WITNESS: Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine Davis Photography? A. Yes. Q. Do you own Sarah Katherine Davis Photography in whole or in part? A. In whole. Q. Are you familiar with the practices
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're about to give will be the truth, the whole truth, and nothing but the truth? THE WITNESS: Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine Davis Photography? A. Yes. Q. Do you own Sarah Katherine Davis Photography in whole or in part? A. In whole. Q. Are you familiar with the practices and policies of Sarah Katherine Davis
4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	and there is no else in the room. * * * * THE COURT REPORTER: Okay. Having identified everyone present for the record, I will now swear the witness in pursuant to KRS 423.455(6). Can you raise your right hand for me? THE WITNESS: (Complies.) THE COURT REPORTER: Do you solemnly swear or affirm the testimony you're about to give will be the truth, the whole truth, and nothing but the truth? THE WITNESS: Yes.	3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	al. That is the caption for the action. A. I've only heard about the one line. Q. Have you discussed taking this deposition with any official from or attorney Representing the Louisville/Jefferson County Metro Government? A. No. THE COURT REPORTER: The follow up to that was "If so, describe everything you talked about." Q. Are you the founder of Sarah Katherine Davis Photography? A. Yes. Q. Do you operate Sarah Katherine Davis Photography? A. Yes. Q. Do you own Sarah Katherine Davis Photography in whole or in part? A. In whole. Q. Are you familiar with the practices

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	Sar <mark>35</mark> 1⁄2 therine Davis	•
	March 30, 2021	

	13		15
1	Sarah Katherine Davis Photography offers and	1	who reside in or near Louisville, Kentucky?
2	provides?	2	A. Again, probably, but I do not ask
3	A. Yes.	3	each couple what their orientation is or what
4	Q. Do you create wedding photography	4	their sexual identity is.
5	on behalf of Sarah Katherine Davis Photography?	5	Q. Do you compete for business with
6	A. Yes.	6	other wedding photographers in or near the
7	Q. Do you or an employee, agent, or	7	Louisville area?
8	independent contractor under your supervision	8	A. Yes.
9	(like a second shooter) create all of the	9	Q. Do you compete to provide
10	wedding photography on behalf of Sarah Katherine	10	engagement and wedding photographs of
11	Davis Photography?	11	opposite-sex weddings with other wedding
12	A. Yes.	12	photographers in or near the Louisville area?
13	Q. Please assume that the remaining	13	A. I guess so.
14	questions about your photography and photography	14	Q. Do you have a business website for
15	services also refer to the photography and	15	Sarah Katherine Davis Photography accessible at
16	photography services of Sarah Katherine Davis	16	this address:
17	Photography.	17	https://www.sarahkatherinedavis.com/?
18	Are you based out of Louisville,	18	A. Yes.
19	Kentucky?	19	Q. Do you advertise or promote the
20	A. Yes.	20	services of Sarah Katherine Davis Photography to
21	THE COURT REPORTER: The next	21	the public on Sarah Katherine Davis
22	question is "If not, where is Sarah Katherine	22	Photography's website?
23	Davis Photography's principal place of	23	A. Yes.
24	Business?" So we can move to the next one.	24	
25		25	Q. Is it your regular practice to
23	Q. Do you offer photography services	25	advertise or promote the services of Sarah
	14		16
1		1	
1 2	to the general public for a fee? A. Yes.	1 2	Katherine Davis Photography on Sarah Katherine
	to the general public for a fee? A. Yes.	1	
2	to the general public for a fee? A. Yes. Q. Do you offer wedding photography	2	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes.
2	to the general public for a fee? A. Yes.	2 3	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes.
2 3 4	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes.	2 3 4	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis
2 3 4 5	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography	2 3 4 5	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website?
2 3 4 5 6	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in	2 3 4 5 6	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes.
2 3 4 5 6 7	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography	2 3 4 5 6 7	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and
2 3 4 5 6 7 8	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes.	2 3 4 5 6 7 8	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and
2 3 4 5 6 7 8	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex	2 3 4 5 6 7 8 9	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine
2 3 4 5 6 7 8 9	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons	2 3 4 5 6 7 8 9	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and
2 3 4 5 6 7 8 9 10	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky?	2 3 4 5 6 7 8 9 10	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes.
2 3 4 5 6 7 8 9 10 11	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples.	2 3 4 5 6 7 8 9 10 11	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about
2 3 4 5 6 7 8 9 10 11 12	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex	2 3 4 5 6 7 8 9 10 11 12 13	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. I don't ask each of my couples what their sexuality is, so probably. Q. Do you willingly offer to	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed and then posted those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes. Q. Do you or an employee, agent, or independent contractor under your supervision
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. I don't ask each of my couples what their sexuality is, so probably. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed and then posted those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes. Q. Do you or an employee, agent, or independent contractor under your supervision write the statements about the weddings you've photographed and post those statements as blogs
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. I don't ask each of my couples what their sexuality is, so probably. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed and then posted those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes. Q. Do you or an employee, agent, or independent contractor under your supervision write the statements about the weddings you've photographed and post those statements as blogs on Sarah Katherine Davis Photography's website?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. I don't ask each of my couples what their sexuality is, so probably. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky? A. I don't discriminate.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed and then posted those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes. Q. Do you or an employee, agent, or independent contractor under your supervision write the statements about the weddings you've photographed and post those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	to the general public for a fee? A. Yes. Q. Do you offer wedding photography for a fee to the general public? A. Yes. Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky? A. Yes. Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky? A. I serve all couples. Q. Have you photographed same-sex weddings for a fee in the past for persons who reside in or near Louisville, Kentucky? A. I don't ask each of my couples what their sexuality is, so probably. Q. Do you willingly offer to photograph same-sex and opposite-sex engagements for a fee for persons who reside in or near Louisville, Kentucky?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Katherine Davis Photography on Sarah Katherine Davis Photography's website? A. Yes. Q. Is it your regular practice to create content for Sarah Katherine Davis Photography's website? A. Yes. Q. Does this include writing and updating the "Home" page, the "About" page, and the "Prices & Rates" page of Sarah Katherine Davis Photography's website? A. Yes. Q. Have you written statements about the engagements and weddings you've photographed and then posted those statements as blogs on Sarah Katherine Davis Photography's website? A. Yes. Q. Do you or an employee, agent, or independent contractor under your supervision write the statements about the weddings you've photographed and post those statements as blogs on Sarah Katherine Davis Photography's website?

	March 3	30, 202	TI
	17		19
1	website, are those statements attributable to	1	A. Yes.
2	Sarah Katherine Davis Photography?	2	(Whereupon, the referred to
3	A. Yes.	3	document was marked as Exhibit B,
4	Q. Are visitors to Sarah Katherine	4	and is attached hereto and made a
5	Davis Photography's website allowed to post	5	part hereof.)
6	comments anywhere else?	6	THE COURT REPORTER: The next
7	A. They can post comments on the blog.	7	question says, "If these pages are not true and
8	Is that what they're asking?	8	correct copies of the current "About" page of
9	THE COURT REPORTER: I'm not sure.	9	Sarah Katherine Davis Photography's website, are
10	A. People can comment on the blog.	10	they true and correct copies of a former "About"
11	Q. Other than the comments by visitors	11	page of Sarah Katherine Davis Photography's
12	to Sarah Katherine Davis Photography's website,	12	website?"
13	do you dictate and control the contents on Sarah	13	
14	•	14	But you said they are current. A. Yes.
	Katherine Davis Photography's website?	15	
15 16	A. Yes.	16	Q. Did you or someone acting on behalf
	Q. Does Sarah Katherine Davis		of Sarah Katherine Davis Photography write the
17	Photography maintain a website, including the	17	statements contained in Exhibit B?
18	"Home" page, the "About" page, the "Prices &	18	A. Yes.
19	Rates" page, the "Frequently Asked Questions"	19	Q. Approximately when were the
20	page, and the blog posts, in the ordinary course	20	statements in Exhibit B posted on Sarah
21	of its business activity?	21	Katherine Davis Photography's website?
22	A. Yes.	22	A. One or two years ago.
23	Q. Please take a look at Exhibit A,	23	Q. Is it true and accurate that you
24	pages 1–2. Are these pages true and correct	24	are "a proud member of Louisville's Fair
25	copies of a portion of the current "Home" page	25	Event Vendors Alliance and love working with
	18		20
1	of Sarah Katherine Davis Photography's website?	1	LGBTQIA+ folks"?
2	A. Yes.	2	A. True.
3	(Whereupon, the referred to	3	O. Is it true and accurate that "Sarah
4	document was marked as Exhibit A,	4	Katherine Davis is an award-winning, inclusive
5	and is attached hereto and made a	5	wedding & elopement photographer based out of
6	part hereof.)	6	Louisville, Kentucky," and "Sarah is passionate
7	Q. If these pages are not true and	7	about fairness & inclusion and loves working
8	correct copies of the current "Home" page of the	8	with the LGBTQ+ community"?
9	website, are they true and correct copies of a	9	A. True.
10	former "Home" page?	10	Q. Are the statements contained on
11	THE COURT REPORTER: That doesn't	11	page 2 in Exhibit B, discussing the services you
12	apply.	12	provide, true and accurate statements about the
13	Q. Did you or someone acting on behalf	13	services that you actually provide?
14	of Sarah Katherine Davis Photography write the	14	A. Yes.
15	statements contained in Exhibit A?	15	THE COURT REPORTER: The next
16	A. Yes.	16	question is "If not, please identify which
17	Q. Approximately when were the	17	statements do not accurately reflect the
18	statements in Exhibit A posted on Sarah	18	services that you or Sarah Katherine Davis
19	Katherine Davis Photography's website?	19	Photography actually provide."
20	A. I'm not sure, maybe two years ago,	20	But that does not apply.
21	maybe a year ago.	21	:
22	Q. Please take a look at Exhibit B,	21	Correct? A. Correct.
23		23	
24	pages 1–2. Are these pages true and accurate		Q. Are the statements contained on
25	Copies of a portion of the current "About" page	24 25	page 1 in Exhibit B, discussing the services you
43	of Sarah Katherine Davis Photography's website?	43	have provided in the past, true and accurate

	Sar ah K atr March 3		
	21		23
1	statements about the services that you actually	1	A. Correct.
2	provided?	2	Q. Please take a look at Exhibit D,
3	A. Yes.	3	pages 1–7.
4	THE COURT REPORTER: The next	4	A. Okay.
5	question is "If not, please identify which	5	Q. Are these pages true and accurate
6	statements do not accurately reflect the	6	copies of the current "Frequently Asked
7	services that you or Sarah Katherine Davis	7	Questions" page of Sarah Katherine Davis
8	Photography have actually provided in the past."	8	Photography's website?
9	But that does not apply.	9	A. Yes.
10	Correct?	10	(Whereupon, the referred to
11	A. Correct.	11	document was marked as Exhibit D,
12	Q. Please take a look at Exhibit C,	12	and is attached hereto and made a
13	pages 1–4.	13	part hereof.)
14	A. Okay.	14	THE COURT REPORTER: The next
15	Q. Are these pages true and accurate	15	question begins, "If these pages are not true
16	copies of the current "Prices & Rates" page of	16	and accurate copies of the current "Frequently
17	Sarah Katherine Davis Photography's website?	17	Asked Questions" page" but that does not apply.
18	A. Yes.	18	Correct?
19	(Whereupon, the referred to	19	A. Correct.
20	document was marked as Exhibit C,	20	Q. Did you or someone acting on behalf
21	and is attached hereto and made a	21	of Sarah Katherine Davis Photography write the
22	part hereof.)	22	statements contained in Exhibit D?
23	THE COURT REPORTER: The next	23	A. Yes.
24	question begins, "If these pages are not true	24	Q. Approximately when were the
25	and correct copies," but that does not apply, so	25	statements in Exhibit D posted on Sarah
	22		24
1	we'll move to the next question.	1	Katherine Davis Photography's website?
2	Q. Did you or someone acting on behalf	2	A. Around two years ago.
3	of Sarah Katherine Davis Photography create the	3	Q. Do the statements in Exhibit D
4	photographs contained in Exhibit C?	4	accurately reflect the policies and practices of
5	A. Yes.	5	Sarah Katherine Davis Photography?
6	Q. Did you or someone acting on behalf	6	A. Yes.
7	of Sarah Katherine Davis Photography write the	7	Q. If not, identify (by page number
8	statements contained in Exhibit C?	8	and sentence) what material in Exhibit D does
9	A. Yes.	9	not accurately reflect the policies and
10	Q. Approximately when were the	10	practices of Sarah Katherine Davis Photography.
11	statements in Exhibit C posted on Sarah	11	THE COURT REPORTER: That does not
12	Katherine Davis Photography's website?	12	apply, right?
13	A. Around two years ago.	13	A. Correct.
14	Q. Are the statements contained in	14	Q. Did you or someone acting on behalf
15	Exhibit C, discussing the services you provide	15	of Sarah Katherine Davis Photography write the
16	and the prices you charge, true and accurate	16	statements contained on the "Home," the "About,"
17	statements about your prices and the services	17	the "Prices & Rates," and the "Frequently Asked
18	that you actually provide?	18	Questions" pages on its website identified in
19	A. Yes.	19	Exhibits A, B, C, and D as a routine part of
20	THE COURT REPORTER: The next	20	operating Sarah Katherine Davis Photography?
21	question begins, "If not, please identify which	21	A. Yes.
22	statements do not accurately reflect your	22	Q. Does Sarah Katherine Davis
23	prices."	23	Photography maintain the "Home," the "About,"
24	But that does not apply.	24	the "Prices & Rates," and the "Frequently Asked

Questions" pages on its website identified in

25

Correct?

25

		50, 202 1	
	25		27
1	Exhibits A, B, C, and D in the ordinary course	1	describing an engagement session that you
2	of business?	2	photographed?
3	A. Yes.	3	A. Yes.
4	Q. Please take a look at Exhibit E,	4	(Whereupon, the referred to
5	page 1.	5	document was marked as Exhibit G,
6	A. Okay.	6	and is attached hereto and made a
7	Q. Is this page a true and accurate	7	part hereof.)
8	copy of a blog post from July 1, 2017 on Sarah	8	Q. Did you or someone acting on behalf
9	Katherine Davis Photography's website,	9	of Sarah Katherine Davis Photography write the
10	describing an engagement session that you	10	statements contained in Exhibit G, page 1?
11	photographed?	11	A. Yes.
12	A. Yes.	12	Q. Please take a look at Exhibit G,
13	(Whereupon, the referred to	13	pages 2–5.
14	document was marked as Exhibit E,	14	A. Okay.
15	and is attached hereto and made a	15	Q. Are these true and accurate copies
16	part hereof.)	16	of photographs posted on Sarah Katherine Davis
17	Q. Did you or someone acting on behalf	17	Photography's website for the blog post that you
18	of Sarah Katherine Davis Photography write the	18	just described?
19	statements contained in Exhibit E?	19	A. Yes.
20	A. Yes.	20	Q. Did you or someone acting on behalf
21	Q. Please take a look at Exhibit F,	21	of Sarah Katherine Davis Photography create
22	page 1. Is this page a true and accurate copy	22	these photographs?
23	of a blog post from May 1, 2018 on Sarah	23	A. Yes.
24	Katherine Davis Photography's website,	24	Q. Please take a look at Exhibit H,
25	describing a wedding that you photographed?	25	pages 1–3.
	26		28
			20
1	A. It is March 1, 2018.	1	A. Okay.
1 2	(Whereupon, the referred to	1 2	A. Okay.Q. Are these pages true and accurate
	(Whereupon, the referred to document was marked as Exhibit F,		A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on
2	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a	2 3 4	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website,
2 3 4 5	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.)	2 3 4 5	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed?
2 3 4 5 6	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf	2 3 4 5 6	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes.
2 3 4 5 6 7	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the	2 3 4 5 6 7	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to
2 3 4 5 6 7 8	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1?	2 3 4 5 6 7 8	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H,
2 3 4 5 6 7 8	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes.	2 3 4 5 6 7 8	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a
2 3 4 5 6 7 8 9	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F,	2 3 4 5 6 7 8 9	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.)
2 3 4 5 6 7 8 9 10	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a	2 3 4 5 6 7 8 9 10	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf
2 3 4 5 6 7 8 9 10 11	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis	2 3 4 5 6 7 8 9 10 11 12	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the
2 3 4 5 6 7 8 9 10 11 12 13	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you	2 3 4 5 6 7 8 9 10 11 12 13	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and
2 3 4 5 6 7 8 9 10 11 12 13 14	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described?	2 3 4 5 6 7 8 9 10 11 12 13 14	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2?
2 3 4 5 6 7 8 9 10 11 12 13 14 15	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H,
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography create this	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography?	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography? A. Yes.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography? A. Yes. Q. Please take a look at Exhibit G,	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	 A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate copies of photographs posted on Sarah Katherine
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography create this photograph? A. Yes. Q. Please take a look at Exhibit G, page 1.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate copies of photography sosted on Sarah Katherine Davis Photography's website for the blog post
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography create this photograph? A. Yes. Q. Please take a look at Exhibit G, page 1. A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate copies of photography posted on Sarah Katherine Davis Photography's website for the blog post that you just described?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography create this photograph? A. Yes. Q. Please take a look at Exhibit G, page 1. A. Okay. Q. Is this page a true and accurate	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate copies of photography posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	(Whereupon, the referred to document was marked as Exhibit F, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit F, page 1? A. Yes. Q. Please take a look at Exhibit F, page 2. Is this a true and accurate copy of a photograph posted on Sarah Katherine Davis Photography's website for the blog post that you just described? A. Yes. Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography create this photograph? A. Yes. Q. Please take a look at Exhibit G, page 1. A. Okay.	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Okay. Q. Are these pages true and accurate copies of a blog post from July 10, 2019 on Sarah Katherine Davis Photography's website, describing a wedding that you photographed? A. Yes. (Whereupon, the referred to document was marked as Exhibit H, and is attached hereto and made a part hereof.) Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the statements contained in Exhibit H, pages 1 and 2? A. Yes. Q. Please take a look at Exhibit H, pages 1, and 3–14. A. Okay. Q. Do they contain true and accurate copies of photography posted on Sarah Katherine Davis Photography's website for the blog post that you just described?

	March 3	30, 202	1
	29		31
1	these photographs?	1	pages 1, and 3–8.
2	A. Yes.	2	A. Okay.
3	Q. Please take a look at Exhibit I,	3	Q. Are these a true and accurate
4	pages 1–2.	4	copies of photographs posted on Sarah Katherine
5	A. Okay.	5	Davis Photography's website for the blog post
6	Q. Are these pages true and accurate	6	that you just described?
7	copies of a blog post from November 23, 2018 on	7	A. Yes.
8	Sarah Katherine Davis Photography's website,	8	Q. Did you or someone acting on behalf
9	describing a couple's session that you	9	of Sarah Katherine Davis Photography create
10	photographed?	10	these photographs?
11	A. Yes.	11	A. Yes.
12	(Whereupon, the referred to	12	Q. Is it your regular business
13	document was marked as Exhibit I,	13	practice to create blog posts like those
14	and is attached hereto and made a	14	identified in Exhibits E, F, G, H, I, and J for
15	part hereof.)	15	Sarah Katherine Davis Photography's website?
16	Q. Did you or someone acting on behalf	16	A. Yes.
17	of Sarah Katherine Davis Photography write the	17	Q. Does Sarah Katherine Davis
18	statements contained in Exhibit I, pages 1 and	18	Photography keep its blog posts like those
19	2?	19	identified as Exhibits E, F, G, H, I, and J in
20	A. Yes.	20	the ordinary course of its business activity?
21	Q. Please take a look at Exhibit I,	21	A. Yes.
22	pages 1–5.	22	Q. Please take a look at Exhibit K,
23	A. Okay.	23	pages 1–3.
24	Q. Do these pages contain true and	24	A. Okay.
25	accurate copies of photographs posted on Sarah	25	Q. Are the photographs contained in
	30		32
1	Katherine Davis Photography's website for the	1	Exhibit K true and accurate copies of
2	blog post that you just described?	2	photographs of a wedding that you photographed?
3	A. Yes.	3	A. Yes.
4	Q. Did you or someone acting on behalf	4	(Whereupon, the referred to
5	of Sarah Katherine Davis Photography create	5	document was marked as Exhibit K,
6	these photographs?	6	and is attached hereto and made a
7	A. Yes.	7	part hereof.)
8	Q. Please take a look at Exhibit J,	8	Q. Did you or someone acting on behalf
9 10	pages 1–2.	9	of Sarah Katherine Davis Photography create
11	A. Okay.	11	these photographs? A. Yes.
12	Q. Are these pages true and accurate copies of a blog post from February 1, 2021 on	12	
13		13	
14	Sarah Katherine Davis Photography's website,	14	Photography have an Instagram page? A. Yes.
15	describing a wedding that you photographed? A. Yes.	15	A. Yes. Q. Are you familiar with Sarah
16	A. Yes. (Whereupon, the referred to	16	Katherine Davis Photography's Instagram page?
17	document was marked as Exhibit J,	17	A. Yes.
18	and is attached hereto and made a	18	Q. Do you advertise or promote your
19	part hereof.)	19	services to the public on Sarah Katherine
20	Q. Did you or someone acting on behalf	20	Davis Photography's Instagram page?
21	of Sarah Katherine Davis Photography write the	21	A. Yes.
22	statements contained in Exhibit J, pages 1 and	22	Q. Please take a look at Exhibit L,
23	2?	23	pages 1–3.
24	A. Yes.	24	A. Okay.
25	Q. Please take a look at Exhibit J,	25	Q. Are these screenshots true and
	· ··· 		•

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Sar351Katl	nerine	Davis
March :	30, 20	21

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	33		35
1	accurate copies of portions of Sarah Katherine	1	A. Yes.
2	Davis Photography's Instagram page?	2	Q. Are you familiar with Sarah
3	A. Yes.	3	Katherine Davis Photography's Facebook page?
4	(Whereupon, the referred to	4	A. Yes.
5	document was marked as Exhibit L,	5	Q. Do you advertise or promote your
6	and is attached hereto and made a	6	services to the public on Sarah Katherine Davis
7	part hereof.)	7	Photography's Facebook page?
8	Q. Are the photographs contained in	8	A. Yes.
9	Exhibit L true and accurate copies of	9	Q. Please take a look at Exhibit M,
10	photographs of a wedding that you photographed?	10	page 1. Is the statement, titled "Documenting
11	A. Yes.	11	love is my favorite thing," a true and correct
12	Q. Did you or someone acting on behalf	12	copy of a statement posted on Sarah Katherine
13	of Sarah Katherine Davis Photography create the	13	Davis Photography's Facebook page?
14	photographs contained in Exhibit L?	14	A. Yes.
15	A. Yes.	15	
16		16	(Whereupon, the referred to document was marked as Exhibit M,
17	Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the	17	and is attached hereto and made a
18	Instagram posts in Exhibit L attributable to	18	
19		19	part hereof.)
20	Sarah Katherine Davis Photography? A. Yes.	20	Q. Did you or someone acting on behalf of Sarah Katherine Davis Photography write the
21			
	Q. Approximately when were the	21	statement in Exhibit M?
22	statements contained in Exhibit L posted on	22	A. Yes.
23	Sarah Katherine Davis Photography's Instagram	23	Q. When did you write the statement
24	page?	24	contained in Exhibit M or approve it to be
25	A. It's a variety of dates that they	25	posted on Sarah Katherine Davis Photography's
	34		36
1		1	
1 2	have here, so 2019 and 2020.	1 2	website?
2	have here, so 2019 and 2020. Q. Is it your regular business	2	website? A. October 1, 2018.
2	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your	2 3	website? A. October 1, 2018. Q. Is it your regular business
2 3 4	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis	2 3 4	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about
2 3 4 5	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page?	2 3 4 5	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah
2 3 4 5 6	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes.	2 3 4 5 6	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook?
2 3 4 5 6 7	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis	2 3 4 5 6 7	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes.
2 3 4 5 6 7 8	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Instagram and all of	2 3 4 5 6 7 8	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes. Q. Does Sarah Katherine Davis
2 3 4 5 6 7 8	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Instagram and all of the contents on the Instagram page attributable	2 3 4 5 6 7 8	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Facebook page and all
2 3 4 5 6 7 8 9	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Instagram and all of the contents on the Instagram page attributable to Sarah Katherine Davis Photography, in the	2 3 4 5 6 7 8 9	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Facebook page and all of the contents on the Facebook page, in the
2 3 4 5 6 7 8 9 10	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Instagram and all of the contents on the Instagram page attributable to Sarah Katherine Davis Photography, in the ordinary course of its business activity?	2 3 4 5 6 7 8 9 10	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Facebook page and all of the contents on the Facebook page, in the ordinary course of its business activity?
2 3 4 5 6 7 8 9 10 11	have here, so 2019 and 2020. Q. Is it your regular business practice to create posts like these about your photography services for Sarah Katherine Davis Photography's Instagram page? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Instagram and all of the contents on the Instagram page attributable to Sarah Katherine Davis Photography, in the ordinary course of its business activity? A. Yes.	2 3 4 5 6 7 8 9 10 11 12	website? A. October 1, 2018. Q. Is it your regular business practice to create posts like this about yourself or your photography services for Sarah Katherine Davis Photography's Facebook? A. Yes. Q. Does Sarah Katherine Davis Photography maintain its Facebook page and all of the contents on the Facebook page, in the ordinary course of its business activity? A. Yes.
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	March 3	30, 202	. 1
	37		39
1	reflect the services that you or Sarah Katherine	1	STATE OF KENTUCKY)
2	Davis Photography actually provide.") SS.
3	But that does not apply.	2	COUNTY OF JEFFERSON)
4	Correct?	3 4	I, JESSICA TAYLOR ROSS, a Notary
5	A. Correct.	5	Public within and for the State at Large, do hereby certify that the foregoing deposition was
6	Q. Are the portions of Exhibit M,	6	taken before me, via Zoom, at the time and for
7	discussing the services you have provided in the	7	the purpose in the caption stated; that the
8	past, true and accurate statements about the	8	witness was first duly sworn to tell the truth,
9	services that you have actually provided?	9	the whole truth and nothing but the truth; that
10	A. Yes.	10 11	the deposition was reduced to digital shorthand
11	THE COURT REPORTER: The next	12	and recorded by me in the presence of the witness; that the foregoing is a full, true and
12	question is, "If not, please identify which	13	correct transcript of my digital notes and
13	portions of the statement do not accurately	14	recording; that there was no request that the
14	reflect the services that you or Sarah Katherine	15	witness read and sign this deposition; that the
15	Davis Photography have actually provided."	16	appearances were as stated in the caption.
16	But that does not apply.	17	WITNESS MAY GIONIATURE 4: 04 1 C
17	Correct?	18 19	WITNESS MY SIGNATURE this 8th day of April, 2021.
18	A. That's correct.	20	My commission expires July 21, 2022.
19	Q. Excluding comments attributed to	21	
20	visitors to your website, Instagram, or Facebook		/s/ Jessica T. Ross
21	page, has any material been posted on Sarah	22	JESSICA TAYLOR ROSS
22	Katherine Davis Photography's website that		Court Reporter
23	inaccurately describes the services that Sarah	23	Notary Public, State At Large Notary ID 602031
24	Katherine Davis Photography offers to the	24	V/JR-P
25	public?	25	775101
	38		
1			
1 2	A. No.		
	A. No. THE COURT REPORTER: The follow up		
2	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is		
2	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate."		
2 3 4	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate." But that does not apply.		
2 3 4 5	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate."		
2 3 4 5 6	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate." But that does not apply. Correct? A. Correct.		
2 3 4 5 6 7	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate." But that does not apply. Correct? A. Correct. Q. Have you ever knowingly had to		
2 3 4 5 6 7 8	A. No. THE COURT REPORTER: The follow up is, "If so, describe that material and how it is inaccurate." But that does not apply. Correct? A. Correct. Q. Have you ever knowingly had to modify how you operate your business in order to		
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Hey there! I'm a wedding & elopement photographer based out of Louisville, Kentucky.

I've been photographing weddings for the past twelve years — it's my jam. A few of my favorite things include: exploring new places, using houseplants to slowly turn my home into a jungle, good (and bad) coffee, and developing film in my free time.

I would love to tell your story!





WEDDINGS

My favorite part of weddings is that you get to celebrate your commitment to your partner with all of your family and friends cheering you on. Even after photographing over 180 weddings, each one holds something completely unexpected and wonderful. I can't wait to be part of yours!



ELOPEMENTS

Elopements allow you the time & space to reflect on your relationship and to make your ceremony focused only on each other. This can be as simple as heading to the courthouse together or as adventurous as spending the day hiking a trail and saying your vows on a cliff as the sun sets.



COUPLES

Couple's sessions are a wonderful way
to document your
relationship, whether that's an
engagement, an anniversary, or just
because. Together we choose a
location that best reflects you as a
couple, such as on a favorite hike, in
your home, a greenhouse, or your
neighborhood bar.

Weddings & Elopements

AUTHENTIC & JOURNALISTIC WEDDING PHOTOGRAPHY

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I can't explain how surreal and amazing it is to wake up each morning and have the career I've always wanted... all because wonderful folks like you allow me to photograph your love. So thank you for literally making my dreams come true every single day, it means the world to me.

I'm a proud member of Louisville's Fair Event Vendors Alliance and love working with LGBTQIA+ folks. I do not discriminate on the basis of race, color, religion, creed, sexual orientation, gender identity, age, national origin, or disability. I routinely research ways to be more inclusive and best serve all my couples, so rest assured I have your back.

I officially founded my business in 2010. Since then, I've photographed over 180 weddings, my work has appeared in more than 50 publications, & I was voted as The Knot's Best of Weddings Pick for KY seven times. If you'd like to hear what other couple's say about working with me you can check out my reviews over on The Knot.





Outside of photographing weddings, you can find me:

- fussing over my 200 house plants (philodendrons & ficuses are my current favorites)
- putting the b in LGBTQ+, loving on my spouse Joyce, and using she/her pronouns
- traveling, hiking, and generally searching for new experiences
- · gardening, learning to forage wild plants, and cooking for friends
- quickly reading sci-fi & fantasy and very slowly reading non-fiction
- staying civically engaged & promoting inclusivity in the wedding industry as a whole

A little background on how I got here: I first stepped into a darkroom when I was 11 years old and immediately knew that photography was what I wanted to do for the rest of my life. When I turned 16, I started working at a studio doing post-production and editing. By 18, I had taken every single photography class my school offered and I realized my favorite part of it all was documenting the relationships around me. My art teacher hired me to photograph her sister's wedding that year and something just clicked. I went on to receive my Bachelor in Fine Arts from U of L and began shooting more and more weddings. I still love documenting the relationships around me just as much as when I began, and I would absolutely love to tell your story.

Sarah Katherine Davis is an award-winning, inclusive wedding & elopement photographer based out of Louisville, Kentucky who specializes in authentic & candid wedding photography. She creates intimate, joyous, & genuine imagery with a blend of documentary and fine art approaches. She has been voted as The Knot Best of Weddings pick for Kentucky by reviewers for seven years. Sarah is passionate about fairness & inclusion and loves working with the LGBTQ+ community and folks of any race, body size, ability, or creed.

Louisville Wedding Photographer // Lexington Wedding Photographer // Kentucky Wedding Photographer



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BASE WEDDING COLLECTION

8 hours // 3,350

Extra hours can be added on at the rate of 400/h up to 10 hours and 700/h

WHAT'S INCLUDED?

- an online gallery full of edited highresolution photos you can download and print
- · timeline assistance

Davipexsonalized assistance with planning



CNP MSJ 00618

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after 10 hours. You can view album pricing here (https://www.sarahkathe rinedavis.com/albums).

I also offer videography (/wedding-videography) as an add on to wedding packages!

- vendor recommendations to fit your style
- · engagement session

TRAVEL RATES

I am always happy to travel for weddings or elopements! My passport is up to date for international weddings, so let me know if you're going that way. For things a little closer to home— if your wedding is within driving distance from Louisville travel is billed simply at 55 cents a mile. For travel that requires a flight I just need the airfare, rental car, and Airbnb covered and no more. I'd love to go wherever you are!

Please see my FAQ (/faq) or contact me (/contact) for additional details.



COUPLE SESSION

1 hour // 500

I LOVE couple sessions. This could be a "day after" session so we can

WHAT'S INCLUDED?

- personalized assistance with planning
- · curated suggestions for locations
- an online gallery full of edited highresolution photos you can download

Davised Print

CNP MSJ 00619

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explore and get messy after your wedding, it could be an engagement, anniversary, or a just because session! I like to work with you to find a location that reflects you as a couple— it might be in your home, your favorite hike, a regular coffee shop, etc.

 "how to get the most out of your couple's session" guide



BASE ELOPEMENT COLLECTION

3 hours // 1,750

Elopement packages are avalaible for non-Saturday events with 50 guests or fewer.

Extra hours can always be added, but for more than 5 hours I recommend the full wedding collection. Travel fees apply outside of the Louisville area.

WHAT'S INCLUDED?

- · personalized assistance with planning
- vendor recommendations to fit your style
- curated suggestions for locations & activities
- an online gallery full of edited highresolution photos you can download and print

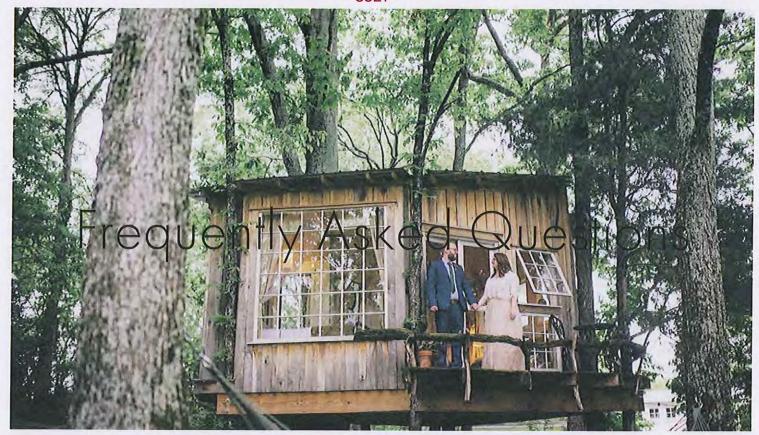
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Sarah Katherine Davis is an award-winning, inclusive wedding & elopement photographer based out of Louisville, Kentucky who specializes in authentic & candid wedding photography. She creates intimate, joyous, & genuine imagery with a blend of documentary and fine art approaches. She has been voted as The Knot Best of Weddings pick for Kentucky by reviewers for seven years. Sarah is passionate about fairness & inclusion and loves working with the LGBTQ+ community and folks of any race, body size, ability, or creed.

Louisville Wedding Photographer // Lexington Wedding Photographer // Kentucky Wedding Photographer



LOUISVILLE, KY @SARAHKATHERINEDAVIS.COM (MAILTO: @SARAHKATHERINEDAVIS.COM)



STYLE

What type of photography do you do for weddings?

I strive to enthusiastically & honestly photograph adventurous, genuine love. My style is largely journalistic, with bits of fine art flair throughout. I'm very hands-off in my coverage of the day (and even a bit sneaky to get those candid shots!), but I still believe there's a time and place for lovely posed images of the two of you together. So while I won't stop you and make you pose while you're cutting the cake or dancing, I would like some time alone with you both to create images of you as a couple without your friends or family around watching. I love breaking this up into three smaller 10-15 minute time-slots when we can— during the first look, after the ceremony, and about 20 minutes before sunset. I always make sure to get shots of the details of the wedding: from your centerpieces to your shoes, so my images will capture all those little things you might have missed during the excitement of the day. My photos of the guests at the wedding are almost entirely journalistic. I don't pull groups away from the fun for posed photos or stop people while eating for those "table shots", instead I prefer to capture them laughing, dancing, drinking, and generally having a wonderful time.

Can I give you a list of shots we want on the day?

Other than the family formals, no. I love to know what important relatives and friends will be present, and if any events or details are significant to you, but tons of requests for posed CNP MSJ 00622s and having a checklist for me to work from is counterproductive to the images you've Davis Ex. D 001



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seen here on my website. "Shot lists" provided by most bridal magazines are a great idea, but please know that I generally will capture those images without any prompting. I always ask for meaningful details & what groupings you'd like for family formals on my pre-wedding form— it gets sent out 4-6 weeks before the wedding.

TRAVEL AND COVERAGE

Do you work with a second shooter?

Not typically. I offer the option if you plan to have an exceptionally large wedding or a wedding that has different elements spread across town, but I've found it unnecessary for 95% of the weddings I've photographed. If you're unsure as to how the day can be documented by only one photographer please check out the weddings posted on my blog— I have an incredible knack for seeming to be in more than one place at once! The phrase "photography ninja" has been used to describe me on multiple occasions. Let me know if adding a second shooter is something you're interested in and we can review your timeline to figure out all of our options together. There have been a handful of weddings when I've been really glad my couple chose to add a second shooter on!

Do you travel for weddings or adventurous engagement sessions?

Yes! My passport is up to date and I love nothing more than a good adventure. I'd love to go wherever you are— from your own backyard all the way to Timbuktu. But seriously, I have a long list of locations I'm really interested in photographing a wedding or elopement in— Colorado, Utah, Oregon, Washington, and California are a few states who's scenery I'm always crushing on. I love visiting the Rocky Mountains, Blue Ridge Mountains, the desert, and literally any coastline from the Pacific Northwest to South America. Internationally, I've traveled to Japan, Peru, Costa Rica, France, Italy, England, China, Iceland, The Virgin Islands, and soon I'll get to add Portugal to the list! I'd love to visit any of those spots again to photograph you and your love in some amazing landscapes or go somewhere brand new with you.

How is travel billed?

Travel is billed very simply— if airfare, hotel and a rental car are needed you are responsible for a direct reimbursement for those charges and no more. Travel outside of the Louisville area, but still within a few hours drive is priced at 55 cents a mile. I'm a budget flyer and an AirBnB lover, so it's surprisingly affordable to have me travel to you!

How long does it take to get our images?

Typically I'll share an image or two on Instagram within a week of the wedding date and the digital files will be shared within six weeks. You'll usually have your images much earlier than when I promise them, but I do like to be safe. The time for fine art albums

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(https://www.sarahkatherinedavis.com/albums) to become available varies depending on many factors, but four to six weeks from the order date is a fairly a safe estimate.

How many pictures will we get?

The number of photographs taken depends on many things — the number of guests, hours of coverage, types of events. My minimum for eight hour weddings is 400 images, but very often it's higher.

What kind of images are given? Can we print them?

I provide the selected, edited high-resolution JPEG files for you to download. Images may be used for personal use only. The contract acts as a written release that will allow you to make unlimited personal prints and copies for your friends and families— you can order them through my online gallery or you can print them from your downloaded files— totally up to you! I do retain the copyright to the images and the right to use them for promotional purposes, competition, professional review, and so on.

Can we upload our photos to Facebook or Instagram once we get the files?

Yes! Social media is a wonderful way to share your photos. As stated in the contract, you may use your images for personal use only. If you want to share them make sure you put "www.sarahkatherinedavis.com" as a comment or caption under each photo and please don't crop or alter the photo in any way. I always appreciate being tagged in the photo as well. You can find me on instagram @sarahkatherinedavisphotography (https://www.instagram.com/sarahkatherinedavisphotography/) or on facebook.com/sarahkatherinedavisphotography (http://facebook.com/sarahkatherinedavisphotography)

Do we get all the raw, unedited files from the day?

No, these files are not available for viewing or purchase. I promise you don't want all the photos of people blinking, walking in front of the lens, or those random awkward faces that sometimes sneak up. I share all the images with you that you'd want— and take a lot of care in selecting and editing those images for final delivery to you.

I see some people have more images than others. Why is that?

Please understand that the blog posts of different weddings all vary based on many things—length of the day, number of guests, how many events were covered in a day, rehearsal dinner coverage, full weekend coverage, etc. Every wedding is different, so each will result in a differing number of final images.

Do you do engagement sessions or couples sessions?

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Yes! I offer a complimentary engagement session for all couples who book a wedding with me. Engagement sessions not only allow you to have images for your save the dates or for placing around the reception, but they also give us a chance to work together before the wedding so you'll feel more comfortable in front of the camera and so we have a chance get to know each other better. Please take note that most engagement sessions need to be done Monday-Thursday because of wedding scheduling, but there is occasionally additional availability on the weekends. Typically these are scheduled 90 minutes before sunset or at sunrise for ideal light, but this can vary depending on location. Complimentary engagements need to take place in Louisville and cannot be traded for other goods or services. Couples sessions outside of a wedding package are \$500. They are a wonderful way to capture more of who you are on a daily basis— outside of all the wedding clothing, flowers, decor, etc. Engagement sessions, anniversary sessions, or sessions just because are so much fun! I could go on and on. Get in contact (/contact) if you're interested and we can plan something specific to you— it could be in your home, somewhere adventurous, in a favorite coffee shop or bar, at a botanical garden, etc...the options are pretty much endless!

I don't need an engagement session. Can I trade it for more hours or products?

The complimentary engagement session cannot be transferred over to other services/products or passed on for credit. A few years ago I added it to my package (without raising prices) because I found that the wedding day goes a million times more smoothly when we've had a chance to work together beforehand. Even couples I know really well all respond to being in front of the camera differently— some prompts and direction work great for one couple and are not a good fit for another. The engagement session lets us try out a whole bunch of different things so that on the wedding day we don't have to spend as much time taking photos since we've already got our groove together. Ultimately, I don't think anyone wants to share their wedding day with a stranger, so I always try to advocate for the session as much as I can— I see it more about the experience and relationship that comes out of it (with the pictures being an awesome bonus.)

Do you offer day after sessions?

YES! Day after sessions are the perfect way to get more photos of you as a couple without having to devote tons of time to it on your wedding day! This gives us the option of going somewhere really amazing (*cough* Red River Gorge *cough*) to get some epic shots without having to worry as much about the wedding day timeline, getting clothing dirty, etc. Pricing for this varies depending on where exactly we'll be going— but I would LOVE to discuss how we can make this happen for you and brainstorm ideas that are in your budget!

What do you charge?

For a detailed breakdown of all my rates click here (/pricing).

Weddings begin at \$3,350 and include eight hours of wedding day coverage, high-resolution images with printing rights, online hosting for 10 years, and a complementary engagement session.

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Additional hours or products can be added on a la carte. Extra hours can be added on at the rate of 400/h up to 10 hours and 700/h after 10 hours. You can view all album (https://www.sarahkatherinedavis.com/albums) pricing here. Engagement or couple sessions outside of a wedding package are \$500.

Please contact me for additional details— I also offer elopement pricing starting at \$1,750 if you're going that way!

BUSINESS AND DETAILS

Do you have business insurance?

Yep!

My venue needs a certificate of insurance. Can you provide that?

Yes— let me know a couple months before wedding if you can since it takes a little bit for my insurance company to process and provide that document.

What kind of cameras do you have?

I have three Nikon 850s as my primary & backup bodies. I shoot with all prime lenses, favoring my 35mm, my 85mm, 105mm and my 50mm. I bring two Nikon Speedlight SB-800s, although I prefer to work with available light when possible.

How long have you been in business?

I shot my first wedding in 2007 and founded my business officially in 2010—shooting over 150 weddings since then!

Can you hold a date for me?

I'm sorry, but I can't hold the date or pencil you in. To be fair to everyone I can't reserve a date without a retainer and a signed contract. I accept bookings on a first come/first served basis.

What is your payment schedule like?

A retainer of 50% of your total balance is due to reserve your date. The remainder is due 30 days prior to your wedding.

I have to cancel my wedding. Can I have my retainer back?

Regretfully, no. The retainer fee and all monies paid are non-refundable. The retainer guarantees that I will hold the date exclusively for you and once you've signed the contract I do turn down

CNP MSJ 00626 commissions for that date.

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If we run overtime, will you stay?

Of course! Additional hours will be billed at my current rate— I will stay only with your permission and approval that I continue coverage. I will bill you for those hours once I get back into the office.

Do you offer discounts during the off-season or for non-weekend events?

I don't offer discounts, but I do offer smaller elopement packages for non-Saturday weddings. If you have concerns about your budgetary needs, please let me know and let's see if we can figure something out!

Do we need to feed you at the reception?

Yes, it would be really wonderful if you did. Feeding me ensures that I stay pleasant, mobile, and that I don't faint from starvation or start taking out of focus images because I can't see straight! I like to be fed when you are fed, not afterwards, because no one wants photos of themselves while eating and that way when you're done, I will be done as well to continue your coverage. (Also sometimes sunset lines up with dinner and we can sneak away together for 5 minutes once you all finish eating to make some sunset magic together!) For buffets I'll usually go in line right after the wedding party. For a served dinner it would be great if you could seat me with guests at a table that has a view of where you'll be sitting. This makes sure I don't get stuck in a backroom to eat the vendor meal— which always has me in a panic thinking I'm going to miss something. (Don't let them hide me away!!)

Can our guests take pictures with their cameras? Will that bother you?

Of course, they are welcome to take photos! I request they try not to jump in front of me while I'm shooting and that they not swarm the family photographs (I'd really prefer all eyes facing my camera in your images), but I don't mind at all if they snap away from the background. I do not allow any family or friends to come along for the images of you two alone for privacy purposes and because other people can be seriously distracting! I welcome other cameras during dancing, cake cutting, and other events— but I do ask politely that people not push me out of the way and generally respect my presence. (I once got elbowed by a very aggressive grandmother so that she could get the shot she wanted— no lies!)

Sarah Katherine Davis is an award-winning, inclusive wedding & elopement photographer based out of Louisville, Kentucky who specializes in authentic & candid wedding photography. She creates intimate, joyous, & genuine imagery with a blend of documentary and fine art approaches. She has been voted as The Knot Best of Weddings

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pick for Kentucky by reviewers for seven years. Sarah is passionate about fairness & inclusion and loves working with the LGBTQ+ community and folks of any race, body size, ability, or creed.

Louisville Wedding Photographer // Lexington Wedding Photographer // Kentucky Wedding Photographer



COUISVILLE, KY @SARAHKATHERINEDAVIS.COM (MAILTO:

CNP MSJ 00628

HOME FEATURED WEDDINGS RECENT WORK ABOUT INFO

Couple's Sessions

Elle & Suzy // LGBTQ Engagement Session // Louisville Couple Photographer

July 1, 2017

Elle & Suzy // Cherokee Park Engagement // Louisville, KY // May 2017

Elfe and Suzy weren't going to make it to Louisville until two days before their wedding, but luckily they carved out some time for us to adventure around the park together. I am always incredibly thankful to all the couples who take the time to have an engagement session with me, but when you've only got a handful of days in town and your session starts at the end of an eight-hour car ride I am especially grateful. I knew we were going to be a great fit for each other as soon as I met them, but when a Seinfeld gif was sent my way after their session I was smitten.

If you've spent any time talking to me you know I LOVE engagement sessions— which is kind of funny since I was vehemently against having one when I was getting marcied. (It's always hard for me to be on the other side of the camera at first.) Honestly one of the reasons I love them so much is because I know a lot of my couples also feel awkward in front of the camera and I want to show them that they won't feel awkward with me. Engagement sessions are an amazing way to experience my style of shooting (goofy, laid-back, and dare I say fun?) and make sure couples aren't stressed at all on the actual wedding day. It also gives all of us a chance to get to know each other better (I don't think anyone wants a stranger at their wedding) and of course, couples get some really awesome images out of it too.

Elle and Suzy were all I could hope for in a couple and more— they were down to climb, wade, and explore with me (and were really chill when we narrowly avoided some poison ivy- eek.) If you think their engagement photos are great, just wait for the wedding images.

Looking to check out more adventurous engagement sessions? Try Angela & Jonathan or Jame & Blake.





March 1, 2018

It's always really hard for me to choose a favorite moment on wedding days, but I will never forget Suzy's face when she saw Elle for the first time at the ceremony. It's way up at the top of my list of best moments from the day (although it was full of amazing moments). If you're short on time, scroll down to the start of the ceremony photos because I really don't want you to miss those reaction shots.

When I first pulled up to the Lincliff Estate I was blown away and I have never been SO GLAD to get to a venue early. There was enough time for me to explore the gardens and once again I found myself fangirling over plants at a wedding. It ended up raining throughout the ceremony (and well into the reception), but it made it feel really intimate and fun. Their grandmothers were the flower girls and one of their best friends was the ring bearer. They had several friends and family members do readings throughout the ceremony— It felt personal, intentional, and romantic.

I would be lying if I said I didn't get a little teary during the toasts and as Elle & Suzy danced with their families. With every interaction, you could tell how much everyone there adored them. Also, EVERYONE was tearing it up on the dance floor— I don't know if I've ever seen a dance floor so packed and full of energy.

If you're wanting to see even more gorgeous spring florals Angela & Jon and Lauren & Joey brought their A-game to the floral department as well. Also Elle & Suzy's engagement session was so much fun—you really should check it out if you haven't seen it already. Or even if you've already seen it because it's that good. As always, I've linked to all the amazing vendors at the bottom of the post.

Elle & Suzy's wedding was featured over on Catalyst Wedding Co!



HOME FEATURED WEDDINGS RECENT WORK ABOUT INFO CONTACT

Couple's Sessions

Will & Nate // Distillery Engagement Session // Louisville Kentucky LGBTQ Wedding and Elopement Photographer //

January 21, 2019

When I work with my couples to plan their engagement sessions, I always start out by having them fill out a questionnaire. I swear it's more fun than it sounds — typically the questions are things we've likely already talked about over coffee or beer. I'm a dork so it's unbelievably fun for me to read about how they met, their typical weekday vs. weekend activities, the favorite date they've ever been on, what their proposal was like, etc. I take all of that information and come up with a few different ideas for shoots and see what direction they want to go in.

For Will and Nate, they mentioned they enjoy distillery tours and that they would love for their session to be something unique to Louisville or Kentucky with casual & cozy vibes. Naturally, Buffalo Trace came to mind and I was so excited when they were on the same page! It's my goal to make couple's sessions feel as much like a date as possible, so we started things out by going on one of the hourly tours. I've had the chance to photograph here several times, but this was the first time I've actually gotten to go on a tour and I really enjoyed it.

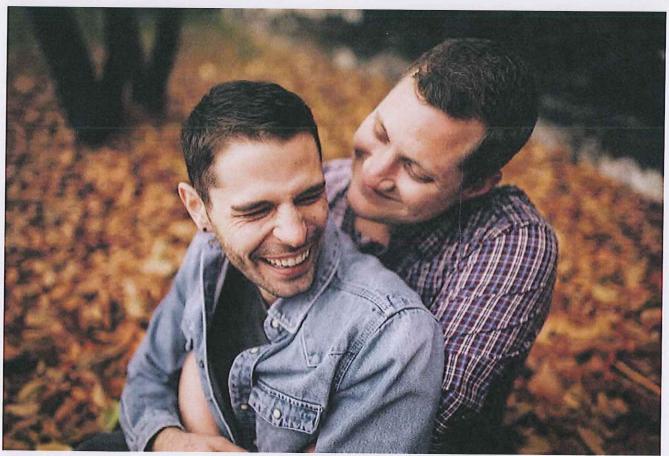
During the session, they made each other laugh so easily. I cannot tell you how much I'm looking forward to their wedding this June!! It was incredibly difficult narrowing down the images for the blog post, but I'm really happy with where I've landed.

If you're hoping for some more cozy & urban vibes then Marcos & Aica's Brooklyn in-home session is always a good choice.



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Weddings

Pride Month LGBTQ Wedding at Hazelnut Farm in Kentucky by Sarah Katherine Davis Photography

July 10, 2019





Ever since Will & Nate's Buffalo Trace engagement session (https://www.sarahkatherinedavis.com/blog/2018/will-amp-nate-distillery-engagement-session-louisville-kentucky-wedding-and-elopement-photographer-), I have been counting down the days until their wedding. When I asked them what they were looking forward to and what inspired them when planning they said, "Our venue is a barn meets ballroom feel so we tried to focus on an upscale Kentucky vibe. Looking forward to everything coming together and having a relaxed evening celebrating."

Their wedding was only the second at Hazelnut Farm (https://www.hazelnutfarmevents.com/) — a new venue that was designed with the help of the ladies over at Honeycomb Wedding Planners (http://www.honeycombweddingplanners.com/). I was freaking out about the gorgeous blue velvet couch in one of the getting ready rooms when Nate let me know that he and Will helped pick it out...which made total sense because it was the perfect backdrop for all their little details. They both wore rainbow socks that complimented each other's but didn't match — same with their boutonnières. All their details were perfect— Will's shoes and belt were both vintage, he carried a handkerchief that was his father's, and the pin her wore over his boutonnière was a family heirloom as well. Nate wore an intricately patterned loafer as well as floral patterned tie & pocket square.

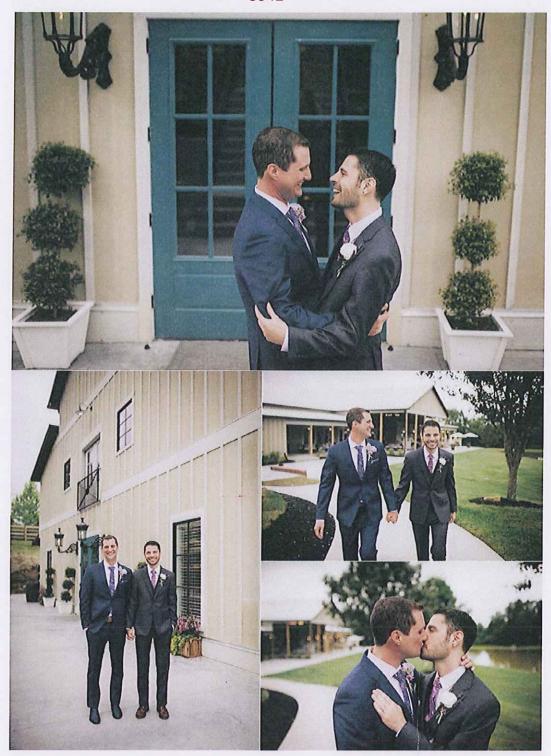
It made me so happy to see that the venue had two quality getting ready rooms— so often the heteronormative attitudes that run rampant the wedding industry mean one "bridal suite" that is big and beautiful and one "man cave" type tiny hideaway room. Regardless if a wedding is LGBTQ or not, everyone deserves to get ready and spend time in a nice room before their wedding.

During the wedding ceremony, family members gave a couple of readings and in-lieu of a sand ceremony they did a bourbon bottling ceremony...which might be my new favorite thing. One of their best friends officiated, which made it really personal and sweet. Speaking of friends helping out, at the reception each table had beautifully handwritten table numbers made by my best friend (and one of their best friends!) Michelle Marie Calligraphy (https://www.instagram.com/michellemariecalligraphy/) who is as kind as she is talented. I loved that their good friend Denizen (http://www.shopdenizen.com/) used actual potted plants in addition to florals on the table— bird's nest ferns are always my favorites (mainly because I struggle growing them myself.) There were also tiny little succulent babies at each seat that each guest was able to take home. They ended up having an extra one that is now living in my kitchen and it makes me smile every time I see it.

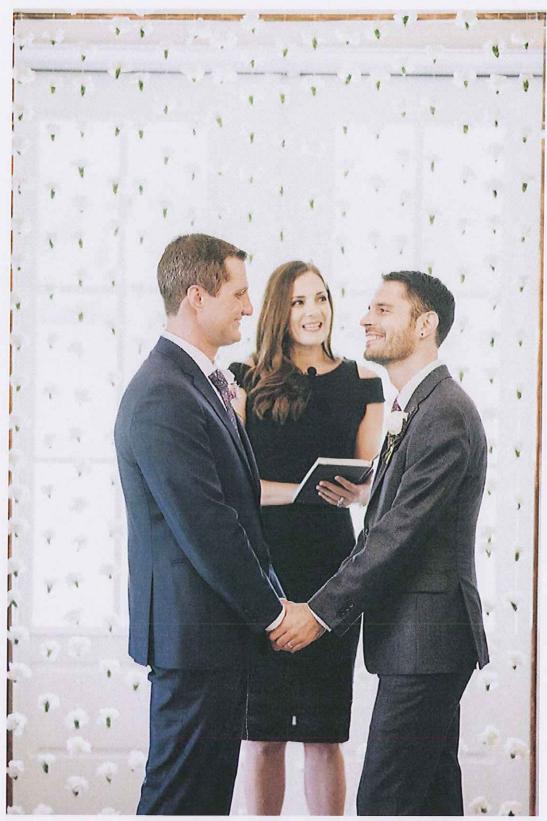
I didn't cry until the first dance— it was "Here I AM" by Dolly Parton & Sia. Something about Dolly always hits me right in the heart and I hadn't heard this one before. During the motherson dances, Nate cut in and danced with Will's mother at the very end and it gave me all the feels. The night ended with glow sticks, light up jewelry, dancing on chairs, and White Castles so you know it was a good time. Now that I've written a novel, shall we hop to the vendor credits & the images?

Venue: Hazelnut Farm (https://www.hazelnutfarmevents.com/) // Coordinator: Melissa Montgomery with Honeycomb Wedding Planners (http://www.honeycombweddingplanners.com/) // Calligraphy : Michelle Marie Calligraphy (https://www.instagram.com/michellemariecalligraphy/) // Florist: Denizen (http://www.shopdenizen.com/) // DJ: Triangle Talent (http://www.triangletalent.com/) // Caterer: Masterson's (http://www.mastersons.com/) // Wedding Party Attire: David's Bridal

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Tagged: pride month (/blog/tag/pride+month), lgbt wedding (/blog/tag/lgbt+wedding), lgbtq wedding (/blog/tag/lgbtq+wedding), lgbtqia engagement (/blog/tag/lgbtqia+engagement), hazelnut farm wedding (/blog/tag/hazelnut+farm+wedding), Kentucky Wedding (/blog/tag/Kentucky+Wedding), barn wedding (/blog/tag/barn+wedding), queer wedding (/blog/tag/queer+wedding), lgbtqia wedding (/blog/tag/lgbtqia+wedding)

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HOME FEATURED WEDDINGS RECENT WORK ABOUT INFO CONTACT

Couple's Sessions

Rebekah & Andrea // Waterfall Adventure Session // Louisville Kentucky LGBTQ Wedding and Elopement Photographer

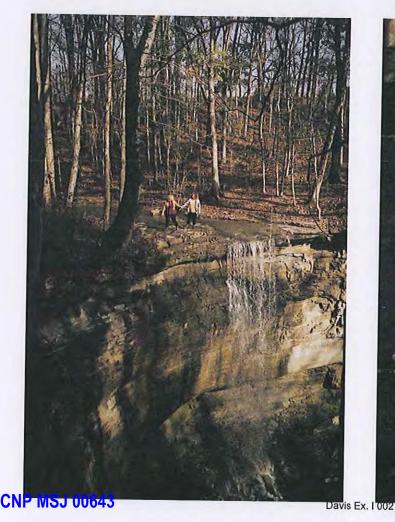
November 23, 2018





If I find myself with an open weekend (a rare occurrence during wedding season) I always do my best to get out for a hike. Not only do I get to explore new places with my spouse, but it also gives me the chance to location scout for my couples. I love being able to share new spots with them for their engagement, anniversary, or elopement sessions— and I love the excuse to get out into nature. A few weeks ago, I visited a couple of gorgeous & secluded waterfalls just outside of Louisville and Rebekah messaged me when she saw them on my story. I was ecstatic to be able to share this magical place with her & Andrea. I also need to give them props— it had rained a lot before this visit, so the way I previously found down to the waterfall was just a stream when we went to shoot. It was a slippery and challenging climb down but they were a) totally on board with my shenanigans and b) so sweet and careful with each other over all the slippery and steep parts. I made some accidentally really awesome jokes, we found some (empty) carpenter bee nests, and the sun created an elusive rainbow above the waterfall. It was an amazing afternoon.

If you're looking for more waterfalls, Jen & Tyler's Iceland engagement session (https://www.sarahkatherinedavis.com/blog/2018/jennifer-amp-tyler-iceland-adventure-engagement-session-louisville-kentucky-wedding-and-elopement-photographer) will do the trick.





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HOME

FEATURED WEDDINGS

RECENT WORK

BOUT INFO

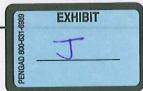
CONTACT

Weddings

Intimate Mellwood Art Center Wedding by Louisville Kentucky Photographer Sarah Katherine Davis Photography

February 1, 2021



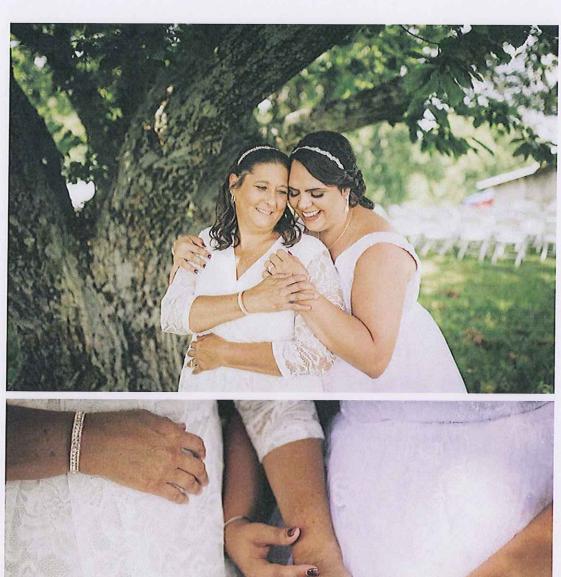


When I first met with Jenny and Haley they were planning a traditional wedding. We talked about what they were imagining, what they were looking forward to, and how to make the day feel true to themselves. Two weeks later Jenny emailed, "Haley and I really appreciated all the time you spent with us and all the insight you shared! It got us both thinking that maybe this "typical" wedding we've been planning isn't what we actually want, it's not what really feels like us. SO, we are totally rethinking the big day." I am always thrilled when I can be an advocate for couples choosing to do what feels right for their wedding rather than what they think they "should" do.

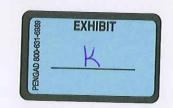
While some couples look forward to all the events that come with a more traditional wedding, many others feel like they are performing or jumping through hoops rather than getting to spend quality time with their family and friends. In my wedding planning guide, I describe myself as a "doing whatever you want because it is YOUR wedding" coach. You can read through some alternatives to various traditions at that link!

Another reason I wanted to share their wedding with you is to highlight how much can be captured with the three-hour elopement package I offer! This package is a great fit for smaller non-Saturday weddings or elopements— you can read more about what is included at the bottom of my pricing page.

And finally, the number one reason I'm excited to share Haley & Jenny's wedding with you is that their wedding and their images have brought me a lot of joy. There were so many thoughtful details throughout the day— all of which they describe much better than I could, so I included quotes from them through the post so you can read more about the significant moments from their beautiful wedding.

















2/24/2021

Facebook

Documenting love is my favorite thing.

SARAH KATHERINE DAVIS PHOTOGRAPHY · MONDAY, OCTOBER 1, 2018 ·

I can't explain how surreal and amazing it is to wake up each morning and have the career I've wanted since I was a child... all because wonderful folks like you allow me to photograph your love. So thank you for literally making my dreams come true every single day, it means to world to me.

A little background on me: I first stepped into a darkroom when I was 11 years old and immediately knew that photography was what I wanted to do for the rest of my life. When I turned 16, I started working at a portrait studio doing post-production and editing. By 18, I had taken every single photography class my school offered and I realized my favorite part of it all was documenting the relationships around me. My art teacher hired me to photograph her sister's wedding that year and something just clicked. I went on to receive my Bachelor in Fine Arts from U of L and began shooting more and more weddings. I still love documenting the relationships around me just as much as when I was 18, and I would absolutely love to tell your story.

I officially founded my business in 2010. Since then, I've photographed over one hundred weddings, have appeared in more than fifty publications, & was voted as The Knot's Best of Weddings Pick for KY six years running.

I'm a proud member of Louisville's Fair Event Vendors Alliance and love working with LGBTQIA+ folks. I do not discriminate on the basis of race, color, religion, creed, sexual orientation, gender identity, national origin, or disability. I routinely research ways to be more inclusive and best serve all my couples, so rest assured I have your back.

If you'd like to hear what other couple's say about working with me you can check out my reviews over on The Knot.



3/1/2021

https://export.amlegal.com/api/export-requests/1b21e8f7-8afb-4365-9cb8-263d96698ac7/download/

§ 92.05 UNLAWFUL PRACTICES IN CONNECTION WITH PUBLIC ACCOMMODATIONS.

- (A) Except as otherwise provided herein, it is an unlawful practice for a person to deny an individual the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation, resort or amusement as defined in § 92.02, on the ground of race, color, religion, national origin, disability, sexual orientation or gender identity.
- (B) It is an unlawful practice for a person, directly or indirectly, to publish, circulate, issue, display, or mail, or cause to be published, circulated, issued, displayed, or mailed, a written, printed, oral or visual communication, notice, or advertisement, which indicates that the goods, services, facilities, privileges, advantages, and accommodations of a place of public accommodation, resort or amusement, will be refused, withheld, or denied an individual on account of his race, color, religion, national origin, disability, sexual orientation or gender identity, or that patronage of, or presence at, a place of public accommodation, resort or amusement, of an individual, on account of his race, color, religion, national origin, disability, sexual orientation or gender identity is objectionable, unwelcome, unacceptable, or undesirable.
- (C) It shall be an unlawful practice to deny an individual, because of sex, the full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations of a restaurant, hotel, motel, or any facility supported directly or indirectly by government funds.
 - (1) The provisions of this subsection shall not apply to:
- (a) Restrooms, shower rooms, bath houses and similar facilities which are in their nature distinctly private;
 - (b) YMCA, YWCA and similar type dormitory lodging facilities;
- (c) The exemptions contained in the definitions of "Place of Public Accommodations, Resort or Amusement" set forth in § 92.02;
- (d) Hospitals, nursing homes, penal or similar facilities, to require that men and women be in the same room.

(1994 Jeff. Code, § 92.06) (Jeff. Ord. 36-1999, adopted and effective 10-12-1999) (1999 Lou. Code, § 98.05) (Lou. Ord. No. 0088-2001, 2, approved 8-16-2001; Lou. Metro Am. Ord. No. 193-2004, approved 12-10-2004)

