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	UNITED STATES DISTRICT COURT	1		
	WESTERN DISTRICT OF KENTUCKY	2	A P P E A R A N C E S	
	LOUISVILLE DIVISION	3		
	Case No. 3-19-CV-00851-BJB-CHL	4	COUNSEL FOR PLAINTIFFS:	
		5		
		6	Bryan D Neihart, Esq, AZ Bar No 035937	
	HELSEY NELSON PHOTOGRAPHY, LLC nd CHELSEY NELSON, PLAINTIFFS	7	(Via Zoom videoconference)	
a	nd CHELSEY NELSON, PLAINTIFFS	8	ALLIANCE DEFENDING FREEDOM	
		9	15100 N 90th Street	
v		10	Scottsdale, AZ 85260	
		11	Telephone: (480) 444-0020	
		12	email: bneihart@ADFlegal org	
	OUISVILLE/JEFFERSON COUNTY METRO	13	$\bigcirc$ $\circ$ $\circ$	
G	OVERNMENT, et al., DEFENDANTS	14	COUNSEL FOR DEFENDANT, LOUISVILLE/JEFI	FERSON
			COUNTY METRO GOVERNMENT:	
D	DEPONENT: MARY SLINGER-CARREER	15		
	DATE: MARCH 31, 2021	16	Casey L Hinkle, Esq	
		17	KAPLAN JOHNSON ABATE & BIRD LLP	
C	COURT REPORTER: JESSICA TAYLOR ROSS	18	710 W Main Street	
		19	4th Floor	
		20	Louisville, KY 40202	
		21	dkaplan@kaplanjohnsonlaw com	
		22	Telephone: (502) 416-1630	
	TAYLOR COURT REPORTING KENTUCKY	23	email: chinkle@kaplanjohnsonlaw.com	
	2901 SIX MILE LANE	24		
	LOUISVILLE, KENTUCKY 40220	25		
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10		10	Stipulations	7
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16 17	MARCH 31, 2021	16		
17		17		
18 19		18		
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**CNP MSJ 00654** 

Taylor Court Reporting Kentucky (502) 671-8110 Fax (502) 671-8116

1 (Pages 1 to 4)

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	March 3	1, 202	1
	5		7
1		1	
2 3	EXHIBITS	2	STIPULATIONS
4	PAGE	3	
5 6	Exhibit A 16	4	The remote deposition on written questions
	(Website "Home" page)	5	of MARY SLINGER-CARREER was taken pursuant to
7	Exhibit B 18	6	Notice via Zoom videoconference, on Wednesday,
8	(Website "About Me" page)	7	March 31, 2021; said deposition, to be used in
9	Exhibit C 21 (Website "Frequently Asked Questions" page)	8	accordance with the Federal Rules of Civil
10		9	Procedure.
11	Exhibit D 23 (Website "Info & Pricing" page)	10	
12	Exhibit E 25	11	
13	(August 17, 2017 blog post)	12	
	Exhibit F 26	13	
14 15	(June 4, 2019 blog post) Exhibit G 27	14	
	(October 6, 2020 blog post)	15	
16	Exhibit H 28	16	
17 18	(November 2, 2016 blog post)	17	
10	Exhibit I 29 (October 16, 2016 blog post)	18	
19		19	
20	Exhibit J 30 (July 13, 2018 blog post)	20	
21	Exhibit K 31	21	
22	(December 18, 2018 blog post)	22	
23	Exhibit L 32 (Photographs)	23	
23	Exhibit M 33	24	
25	(Metro Ordinance 92.05)	25	
1	6	1	8
1 2		2	INTRODUCTION
∠ 3	EXHIBITS	3	INTRODUCTION
4	PAGE	4	THE COURT REPORTER: We are on the
5	TAGE	5	record. My name is Jessie Ross, the court
6	Exhibit N 33	6	reporter. I'm reporting remotely today from
	(Instagram screenshots)	7	Louisville, Kentucky via Zoom videoconference.
7	(	8	Counsel, please state your name and whom you
8		9	represent. Also, let us know if anyone else is
9		10	in the room with you.
10		11	MR. NEIHART: Good morning. My
11		12	name is Bryan Neihart. I'm representing the
12		13	plaintiffs in this case, Chelsey Nelson
13		14	Photography LLC and Chelsey Nelson. There is no
14		15	one else present with me in the room.
15		16	MS. HINKLE: Good morning. My name
16		17	is Casey Hinkle. I'm an attorney for the
17		18	defendants and no one else is present with me.
18 10		19	THE COURT REPORTER: Okay. I will
19 20		20	now ask the witness, can you please state your
20 21		21	full name for the record and let us know if
22		22	there is anyone else in the room with you?
23		23	THE WITNESS: My name is Mary
		24	Slinger-Carreer and there is no one else in the
24 25		24 25	Slinger-Carreer and there is no one else in the room with me.

2 (Pages 5 to 8)

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	9		11
1		1	If so, describe everything you talked about.
2	* * *	2	A. I have not discussed this with
3		3	them.
4	THE COURT REPORTER: Having	4	Q. Are you the founder of We Choose
5	identified everyone present for the record, I	5	the Moon Photography?
6	will now swear the witness in pursuant to	6	A. I am.
7	KRS 423.455(6).	7	Q. Do you operate We Choose the Moon
8	Ma'am, can you raise your right	8	Photography?
9	hand for me?	9	A. I do.
10	THE WITNESS: (Complies.)	10	Q. Do you own We Choose the Moon
11	THE COURT REPORTER: Do you	11	Photography in whole or in part?
12	solemnly swear or affirm the testimony you're	12	A. In whole.
13	about to give will be the truth, the whole	13	Q. Are you familiar with the practices
14	truth, and nothing but the truth?	14	and policies of We Choose the Moon Photography?
15	THE WITNESS: I do.	15	A. Yes.
16	THE COURT REPORTER: Thank you.	16	Q. Are you familiar with the services
17		17	We Choose the Moon Photography offers and
18		18	provides?
19		19	A. Yes.
20		20	Q. Do you create wedding photography
21		21	on behalf of We Choose the Moon Photography?
22		22	A. I do.
23		23	Q. Do you or an employee, agent, or
24		24	independent contractor under your supervision
25		25	(like a second shooter) create all of the
	10		12
1		1	wedding photography on behalf of We Choose the
2	PROCEEDINGS	2	Moon Photography?
3		3	A. Yes.
4	MARY SLINGER-CARREER, the said	4	Q. Please assume that the remaining
5	witness, called by the Plaintiffs, CHELSEY		Q. Freuer accurate and the remaining
6	, ,	5	questions about your photography and photography
	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON,	5 6	
7			questions about your photography and photography
7 8	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON,	6	questions about your photography and photography services also refer to the photography and
	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and	6 7	questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon
8	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter	6 7 8	questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography.
8 9	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter	6 7 8 9	questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon Photography's principal place of business? A. My home.
8 9 10	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions:	6 7 8 9 10 11 12	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography.</li> <li>Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> </ul>
8 9 10 11	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions:	6 7 8 9 10 11	questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon Photography's principal place of business? A. My home.
8 9 10 11 12	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION	6 7 8 9 10 11 12 13 14	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography.</li> <li>Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> </ul>
8 9 10 11 12 13	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current	6 7 8 9 10 11 12 13 14 15	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography.</li> <li>Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> </ul>
8 9 10 11 12 13 14	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation?	6 7 8 9 10 11 12 13 14 15 16	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography.</li> <li>Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> </ul>
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8 9 10 11 12 13 14 15 16	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly swom, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation? A My name is Mary Slinger-Carreer I am years old I live at the statements,	6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> </ul>
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8 9 10 11 12 13 14 15 16 17 18	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation? A My name is Mary Slinger-Carreer I am years old I live at the state of	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to members of the public who reside in or near Louisville, Kentucky?</li> </ul>
8 9 10 11 12 13 14 15 16 17 18 19	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation? A My name is Mary Slinger-Carreer I an vears old 1 live at vears, Shelbyville, Kentucky, 40065 And I am a wedding and engagement photographer Q Do you know any of the parties to	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	<ul> <li>questions about your photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography for a fee to members of the public who reside in or near Louisville, Kentucky?</li> <li>A. Yes.</li> </ul>
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8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation? A My name is Mary Slinger-Carreer I am years old I live at . Shelbyville, Kentucky, 40065 And I am a wedding and engagement photographer Q Do you know any of the parties to the above-entitled action, and if so, how long have you known such parties or party? A I do not know them	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to members of the public who reside in or near Louisville, Kentucky?</li> <li>A. Yes.</li> <li>Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons who reside in or near Louisville, Kentucky?</li> </ul>
8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	NELSON PHOTOGRAPHY, LLC and CHELSEY NELSON, having been first duly sworn, was examined and deposed as follows, with the court reporter reading the questions: * * * EXAMINATION Q What is your name, age, current residence address, and occupation? A My name is Mary Slinger-Carreer I am years old I live at (1), Shelbyville, Kentucky, 40065 And I am a wedding and engagement photographer Q Do you know any of the parties to the above-entitled action, and if so, how long have you known such parties or party? A I do not know them Q Have you discussed taking this	6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	<ul> <li>questions about your photography and photography services also refer to the photography and photography services of We Choose the Moon Photography. Where is We Choose the Moon</li> <li>Photography's principal place of business?</li> <li>A. My home.</li> <li>Q. Do you offer photography services</li> <li>to the general public for a fee?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to the general public?</li> <li>A. Yes.</li> <li>Q. Do you offer wedding photography</li> <li>for a fee to members of the public who reside in or near Louisville, Kentucky?</li> <li>A. Yes.</li> <li>Q. Do you offer to photograph same-sex and opposite-sex weddings for a fee for persons</li> </ul>

Taylor Court Reporting Kentucky (502) 671-8110 Fax (502) 671-8116

3 (Pages 9 to 12)

# Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 330 of 565 PageID #: Match 31, 2021

	13		15
1	Q. Have you photographed same-sex	1	Photography's website?
2	weddings for a fee in the past for persons who	2	A. Yes.
3	reside in or near Louisville, Kentucky?	3	Q. Do you or an employee, agent, or
4	A. I don't know.	4	independent contractor under your supervision
5	Q. Do you willingly offer to	5	write the statements about the weddings you've
6	photograph same-sex and opposite-sex engagements	6	photographed and post those statements as blogs
7	for a fee for persons who reside in or near	7	on We Choose the Moon Photography's website?
8	Louisville, Kentucky?	8	A. Yes.
9	A. Yes.	9	Q. If someone else does write and post
10	Q. Have you photographed same-sex	10	blogs on We Choose the Moon Photography's
11	engagements for a fee in the past for persons	11	website, are those statements attributable to We
12	who reside in or near Louisville, Kentucky?	12	Choose the Moon Photography?
13	A. I don't know. I don't ask about my	13	A. Yes, but I'm the only one who's
14	clients' sexuality.	14	ever written anything for my website and blog.
15	Q. Do you compete for business with	15	O. Are visitors to We Choose the Moon
16	other wedding photographers in or near the	16	Photography's website allowed to post comments
17	Louisville area?	17	anywhere?
18	A. Did you say do I compete? I do.	18	A. No. Well, not on my website, on my
19	Q. Do you compete to provide	19	blog it's on my blog they can make comments.
20	engagement and wedding photographs of	20	They're two they're kind of two separate
21	opposite-sex weddings with other wedding	21	things.
22	photographers in or near the Louisville area?	22	-
23		23	· ·
23	A. I do.	23	to We Choose the Moon Photography's website, do
24	Q. Do you have a business website for	24	you dictate and control the contents on We
20	We Choose the Moon Photography accessible at	25	Choose the Moon Photography's website?
	14		16
1		1	
1	this address:	1	A. Yes.
2	this address: https://www.wechoosethemoon.photo/?	2	<ul><li>A. Yes.</li><li>Q. Does We Choose the Moon Photography</li></ul>
2 3	this address: https://www.wechoosethemoon.photo/? A. Yes.	2 3	<ul><li>A. Yes.</li><li>Q. Does We Choose the Moon Photography maintain its website, including home, "About</li></ul>
2 3 4	this address: https://www.wechoosethemoon.photo/? A. Yes. Q. Do you advertise or promote the	2 3 4	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography maintain its website, including home, "About Me," "Frequently Asked Questions," and "Info &amp;</li> </ul>
2 3 4 5	<ul><li>this address:</li><li>https://www.wechoosethemoon.photo/?</li><li>A. Yes.</li><li>Q. Do you advertise or promote the services of We Choose the Moon Photography to</li></ul>	2 3 4 5	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography maintain its website, including home, "About Me," "Frequently Asked Questions," and "Info &amp; Pricing" pages in the ordinary course of its</li> </ul>
2 3 4 5 6	<ul> <li>this address:</li> <li>https://www.wechoosethemoon.photo/?</li> <li>A. Yes.</li> <li>Q. Do you advertise or promote the services of We Choose the Moon Photography to the public on We Choose the Moon Photography's</li> </ul>	2 3 4 5 6	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography maintain its website, including home, "About Me," "Frequently Asked Questions," and "Info &amp; Pricing" pages in the ordinary course of its business activity?</li> </ul>
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**CNP MSJ 00657** 

Taylor Court Reporting Kentucky (502) 671-8110 Fax (502) 671-8116

4 (Pages 13 to 16)

#### Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 331 of 565 PageID #: Mass 68 nger Carreer

March 31, 2021

Ivial CIT 3	51, 202	
17		19
A. Yes, they are.	1	Q. Page 3 of Exhibit B states under
Q. Did you or someone acting on behalf	2	Anti-Discrimination: "I feel it's pretty clear
of We Choose the Moon Photography write the	3	on my website, but in case it's not, here is it
statements contained in Exhibit A?	4	point blank: I am anti-racist and
A. Yes.	5	antihomophobic. I'm an inclusive photographer
Q. Approximately when were the	6	and I want everyone to have a seat at the table
statements in Exhibit A posted on the home page	7	and be represented." Is this a true and correct
of We Choose the Moon Photography's website?	8	statement about your stance on being an
A. This is when I did my redesign and	9	inclusive photographer?
I think I did my redesign in January of 2019.	10	A. Yes.
Q. Page 2 of Exhibit A states: "Tm a	11	Q. Page 3 of Exhibit B states under
wedding photographer based in Louisville,	12	Retouching/Photoshopping: "I'm a body positive
Kentucky and my work is a little more modern,	13	activist. Therefore, I do not photoshop anyone.
alternative, dark, moody, radder (however you	14	I'm happy to clean up blemishes because I know
describe it) than the rest." Is this a true and	15	those can be out of your control, but I will not
correct statement about you and your work?	16	photoshop or manipulate your body in anyway.
A. Yes.	17	Such retouching does more harm than good and I
THE COURT REPORTER: The next	18	refuse to add to the problem. You're fantastic
question is, "If not, please identify which	19	just the way you are." Is this a true and
statements do not accurately reflect you and	20	correct statement about your position on
your work."	21	retouching and photoshopping?
That doesn't apply.	22	A. Yes.
Correct?	23	Q. Page 4 of Exhibit B states under
A. Yes.	24	"How I Approach Things": "I like contrast. I
Q. Please take a look at Exhibit B.	25	like weird (interesting) light. I even like
18		20
Are these pages true and accurate copies of the	1	desaturated colors sometimes. I've been told my
current "About Me" page of We Choose the Moon	2	work is moody and grainy with a film and fine
Photography's website?	3	art appeal. I'm ok with that; because I like
A. Yes.	4	grainy images. I even like blurry or slightly
(Whereupon, the referred to	5	out of focus pictures. I'm ok with people
document was marked as Exhibit B,	6	calling my work "artsy" because I love to
and is attached hereto and made a	7	provide images to you that turns your hallway
part hereof.)	8	into a small art gallery." Is this a true and
Q. If these pages are not true and	9	accurate statement about your and others'
correct copies of the current "About Me" page of	10	perception of your photography style?
We Choose the Moon Photography's website, are	11	A. Yes.
they true and correct copies of a former "About	12	Q. If any of the statements on pages
Me" page of We Choose the Moon Photography's	13	3-4 of Exhibit B are not true and correct

#### 

### **CNP MSJ 00658**

б 

website?

and correct.

A. Yes.

Q.

website?

A.

A. It doesn't apply. They are true

Q. Did you or someone acting on behalf

of We Choose the Moon Photography write the

Approximately when were the

page of We Choose the Moon Photography's

statements in Exhibit B posted on the "About Me"

statements contained in Exhibit B?

January 2019.

Taylor Court Reporting Kentucky (502) 671-8110 Fax (502) 671-8116

5 (Pages 17 to 20)

statements, please identify in what ways the

That doesn't apply. They're all

Please take a look at Exhibit C.

current "Frequently Asked Questions" page of We

No. I've switched out some of the

Are these pages true and accurate copies of the

Choose the Moon Photography's website?

statements are not accurate.

A.

Q.

A.

photos.

accurate.

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(Whereupon, the referred to

part hereof.)

Q.

website?

A.

Q.

Α.

Q.

A.

Q.

Yes.

Yes.

document was marked as Exhibit C,

and is attached hereto and made a

If these pages are not true and

Asked Questions" page of We Choose the Moon

Photography's website, are they true and correct

copies of a former "Frequently Asked Questions"

Did you or someone acting on behalf

page of We Choose the Moon Photography's

of We Choose the Moon Photography write the

Approximately when were the

"Frequently Asked Questions" page of We Choose

Are the statements contained in

Exhibit C, discussing the services you provide,

true and accurate statements about the services

statements contained in Exhibit C?

statements in Exhibit C posted on the

the Moon Photography's website?

January 2019.

that you actually provide?

correct copies of the current "Frequently

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March 31, 2021

	23
1	(Whereupon, the referred to
2	document was marked as Exhibit D,
3	and is attached hereto and made a
4	part hereof.)
5	Q. If these pages are not true and
6	correct copies of the current "Info & Pricing"
7	page of We Choose the Moon Photography's
8	website, are they true and correct copies of a
9	former "Info & Pricing" page of We Choose the
10	Moon Photography's website?
11	A. Yes.
12	Q. Did you or someone acting on behalf
13	of We Choose the Moon Photography write the
14	statements contained in Exhibit D?
15	A. Yes.
16	Q. Approximately when were the

24

Q. Approximately when were the 17 statements in Exhibit D posted on the "Info & 18 Pricing" page of We Choose the Moon Photography's website? A. January 2019.

Q. Are the statements contained in Exhibit D, discussing your prices and the services you provide, true and accurate statements about your prices and services that you actually provide?

1 1 A. Yes. Yes. A. 2 2 Q. If not, please identify which Q. If not, please identify which 3 3 statements do not accurately reflect the statements do not accurately reflect your prices 4 4 services that you or We Choose the Moon or the services that you or We Choose the Moon 5 5 Photography actually provide. Photography actually provide. 6 A. Does not apply. 6 A. Does not apply. 7 Q. Are the statements contained in 7 Are the statements contained in О. 8 Exhibit C, discussing the services you have 8 Exhibit D, discussing your prices and the 9 9 provided in the past, true and accurate services you have provided in the past, true and 10 statements about the services that you actually 10 accurate statements about your prices and the 11 provided? 11 services that you actually provided? 12 12 A. Yes. A. Yes. 13 13 If not, please identify which О. If not, please identify which Q. 14 14 statements do not accurately reflect the statements do not accurately reflect your prices 15 services that you or We Choose the Moon 15 and the services that you or We Choose the Moon 16 Photography have actually charged or provided in Photography have actually provided in the past. 16 17 17 A. It does not apply. the past. 18 18 Please take a look at Exhibit D. Q. A. Doesn't apply. 19 Are these pages true and accurate copies of the 19 Q. Did you or someone acting on behalf 20 20 current "Info & Pricing" page of We Choose the of We Choose the Moon Photography write the 21 Moon Photography's website? 21 statements contained on the home, "About Me," 22 A. No, some of the photos have been 22 "Frequently Asked Questions," and "Info & 23 23 changed. Pricing" pages identified in Exhibits A, B, C, 24 24 and D as a routine part of operating We Choose

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25 the Moon Photography?

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6 (Pages 21 to 24)

## Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 333 of 565 PageID #:

Match 3 Match 3	er Carr	reer
25		27
A. Yes.	1	copy of a blog post from October 6, 2020 on We
Q. Does We Choose the Moon Photography	2	Choose the Moon Photography's website,
maintain the home, "About Me," "Frequently Asked	3	describing a couple's session that you
Questions," and "Info & Pricing" pages	4	photographed?
identified in Exhibits A, B, C, and D on its	5	A. It is, but these were not paying
website in the ordinary course of business?	6	clients.
A. Yes.	7	(Whereupon, the referred to
Q. Please take a look at Exhibit E,	8	document was marked as Exhibit G,
page 1. Is this page a true and accurate copy	9	and is attached hereto and made a
of a blog post from August 17, 2017 on We Choose		part hereof.)
the Moon Photography's website, describing an	11	Q. Did you or someone acting on behalf
engagement that you photographed?		of We Choose the Moon Photography write the
A. Yes, it is.	13	statements contained in Exhibit G?
(Whereupon, the referred to	14	A. Yes.
document was marked as Exhibit E,	15	Q. Please take a look at Exhibit G,
and is attached hereto and made a	16	pages 1–5.
part hereof.)	17	A. Yep.
Q. Did you or someone acting on behalf	18	Q. Are these true and accurate copies
of We Choose the Moon Photography write the	19	of couple's photographs posted on We Choose the
statements contained in Exhibit E?	20	Moon Photography's website for the blog post
A. Yes.	21	that you just described?
Q. Please take a look at Exhibit E,	22	A. Yes.
pages 2-11. Are these true and accurate copies	23	Q. Did you or someone acting on behalf

Q. Did you or someone acting on behalf of We Choose the Moon Photography create these photographs?

24

25

		26		28
1	that you	1 just described?	1	A. Yes.
2	А.	They are.	2	Q. Please take a look at Exhibit H,
3	Q.	Did you or someone acting on behalf	3	page 1. Is this page a true and accurate copy
4	of We G	Choose the Moon Photography create these	4	of a blog post from November 2, 2016 on We
5	photogr	raphs?	5	Choose the Moon Photography's website,
6	А.	Yes.	6	describing a wedding that you photographed?
7	Q.	Please take a look at Exhibit F,	7	A. Yes.
8	page 1.	Is this page a true and accurate copy	8	(Whereupon, the referred to
9	of a blo	g post from June 4, 2019 on We Choose	9	document was marked as Exhibit H,
10	the Moo	on Photography's website, describing a	10	and is attached hereto and made a
11	weddin	g that you photographed?	11	part hereof.)
12	А.	Yes.	12	Q. Did you or someone acting on behalf
13		(Whereupon, the referred to	13	of We Choose the Moon Photography write the
14		document was marked as Exhibit F,	14	statements contained in Exhibit H?
15		and is attached hereto and made a	15	A. Yes.
16		part hereof.)	16	Q. Please take a look at Exhibit H,
17	Q.	Did you or someone acting on behalf	17	pages 2–13. Are these true and accurate copies
18	of We G	Choose the Moon Photography write the	18	of wedding photographs posted on We Choose the
19	stateme	nts contained in Exhibit F?	19	Moon Photography's website for the blog post
20	А.	Yes.	20	that you just described?
21	Q.	Please take a look at Exhibit G,	21	A. Yes.
22	page 1.		22	Q. Did you or someone acting on behalf
23		THE COURT REPORTER: Are you there?	23	of We Choose the Moon Photography create these
24	А.	Yes.	24	photographs?
25	Q.	Is this page a true and accurate	25	A. Yes.

### **CNP MSJ 00660**

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of engagement photographs posted on We Choose

the Moon Photography's website for the blog post

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7 (Pages 25 to 28)

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	29		31
1	Q. Please take a look at Exhibit I,	1	photographs?
2	page 1. Is this page a true and accurate copy	2	A. Yes.
3	of a blog post from October 16, 2016 on We	3	Q. Please take a look at Exhibit K,
4	Choose the Moon Photography's website,	4	page 1. Is this page a true and accurate copy
5	describing a wedding that you photographed?	5	of a blog post from December 18, 2018 on We
. 6	A. Yes.	6	Choose the Moon Photography's website,
7		7	
8	(Whereupon, the referred to	8	describing a photoshoot that you photographed?
9	document was marked as Exhibit I,	1	A. Yes.
	and is attached hereto and made a	9	(Whereupon, the referred to
10 11	part hereof.)	10 11	document was marked as Exhibit K,
12	Q. Did you or someone acting on behalf	12	and is attached hereto and made a
	of We Choose the Moon Photography write the	1	part hereof.)
13	statements contained in Exhibit I?	13	Q. Did you or someone acting on behalf
14	A. Yes.	14	of We Choose the Moon Photography write the
15	Q. Please take a look at Exhibit I,	15	statements contained in Exhibit K?
16	pages 2–4. Are these true and accurate copies	16	A. Yes.
17	of wedding photographs posted on We Choose the	17	Q. When did you or someone acting on
18	Moon Photography's website for the blog post	18	behalf of We Choose the Moon Photography write
19	that you just described?	19	the statements contained in Exhibit K?
20	A. Yes.	20	A. It was posted on December 18th of
21	Q. Did you or someone acting on behalf	21	2018.
22	of We Choose the Moon Photography create these	22	Q. Is it your regular business
23	photographs?	23	practice to create blog posts like those
24	A. Yes.	24	identified in Exhibits E, F, G, H, I, J, and K
25	Q. Please take a look at Exhibit J,	25	for We Choose the Moon Photography's website?
	30		32
1	page 1. Is this page a true and accurate copy	1	A. Yes.
2	page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose	2	<ul><li>A. Yes.</li><li>Q. Does We Choose the Moon Photography</li></ul>
2 3	page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a	2 3	<ul><li>A. Yes.</li><li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as</li></ul>
2 3 4	page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?	2 3 4	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary</li> </ul>
2 3 4 5	<ul><li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li><li>A. Yes.</li></ul>	2 3 4 5	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> </ul>
2 3 4 5 6	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes.</li> <li>(Whereupon, the referred to</li> </ul>	2 3 4 5 6	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> </ul>
2 3 4 5 6 7	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J,</li> </ul> </li> </ul>	2 3 4 5 6 7	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> </ul>
2 3 4 5 6 7 8	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a</li> </ul> </li> </ul>	2 3 4 5 6 7 8	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> </ul>
2 3 4 5 6 7 8 9	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> </ul>	2 3 4 5 6 7 8 9	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> </ul>
2 3 4 5 6 7 8 9 10	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf</li> </ul>	2 3 4 5 6 7 8 9 10	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography</li> <li>keep its blog posts like those identified as</li> <li>Exhibits E, F, G, H, I, J, and K in the ordinary</li> <li>course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> <li>pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies</li> </ul>
2 3 4 5 6 7 8 9 10 11	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the</li> </ul>	2 3 4 5 6 7 8 9 10 11	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography</li> <li>keep its blog posts like those identified as</li> <li>Exhibits E, F, G, H, I, J, and K in the ordinary</li> <li>course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> <li>pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies</li> <li>of photographs created by or on behalf of We</li> </ul>
2 3 4 5 6 7 8 9 10 11 12	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> </ul>	2 3 4 5 6 7 8 9 10 11 12	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J? <ul> <li>A. Yes.</li> </ul> </li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> <li>A. Yes.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography</li> <li>keep its blog posts like those identified as</li> <li>Exhibits E, F, G, H, I, J, and K in the ordinary</li> <li>course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> <li>pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies</li> <li>of photographs created by or on behalf of We</li> <li>Choose the Moon Photography?</li> <li>A. Yes.</li> <li>(Whereupon, the referred to</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography</li> <li>keep its blog posts like those identified as</li> <li>Exhibits E, F, G, H, I, J, and K in the ordinary</li> <li>course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> <li>pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies</li> <li>of photographs created by or on behalf of We</li> <li>Choose the Moon Photography?</li> <li>A. Yes.</li> <li>(Whereupon, the referred to</li> <li>document was marked as Exhibit L,</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J? <ul> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> </ul> </li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography</li> <li>keep its blog posts like those identified as</li> <li>Exhibits E, F, G, H, I, J, and K in the ordinary</li> <li>course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L,</li> <li>pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies</li> <li>of photographs created by or on behalf of We</li> <li>Choose the Moon Photography?</li> <li>A. Yes.</li> <li>(Whereupon, the referred to</li> <li>document was marked as Exhibit L,</li> <li>and is attached hereto and made a</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J? <ul> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> </ul> </li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> <li>A. Yes.</li> <li>(Whereupon, the referred to document was marked as Exhibit L, and is attached hereto and made a part hereof.)</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. I posted it on July 13, 2018.</li> <li>Q. Please take a look at Exhibit J,</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit L, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Please take a look at Exhibit M.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. I posted it on July 13, 2018.</li> <li>Q. Please take a look at Exhibit J, pages 2–13. Are these true and accurate copies</li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit L, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Please take a look at Exhibit M. Have you ever knowingly had to modify how you</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>page 1. Is this page a true and accurate copy of a blog post from July 13, 2018 on We Choose the Moon Photography's website, describing a photoshoot that you photographed?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit J, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J? <ul> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. When did you or someone acting on behalf of We Choose the Moon Photography write the statements contained in Exhibit J?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit J, pages 2–13. Are these true and accurate copies of photographs posted on We Choose the Moon Photography's website for the blog post that you just described?</li> </ul> </li> </ul>	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	<ul> <li>A. Yes.</li> <li>Q. Does We Choose the Moon Photography keep its blog posts like those identified as Exhibits E, F, G, H, I, J, and K in the ordinary course of its business activity?</li> <li>A. Yes.</li> <li>Q. Please take a look at Exhibit L, pages 1–11.</li> <li>A. I got it.</li> <li>Q. Are these true and accurate copies of photographs created by or on behalf of We Choose the Moon Photography?</li> <li>A. Yes. <ul> <li>(Whereupon, the referred to document was marked as Exhibit L, and is attached hereto and made a part hereof.)</li> </ul> </li> <li>Q. Please take a look at Exhibit M. Have you ever knowingly had to modify how you operate your business in order to comply with</li> </ul>
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Taylor Court Reporting Kentucky (502) 671-8110 Fax (502) 671-8116

8 (Pages 29 to 32)

#### Case 3:19-cv-00851-BJB-CHL D #:

00851-BJB-CHL Document 92-7 F M <b>ଙ୍କରୁ6ା</b> ng March 3	er Car	reer
33		35
(Whereupon, the referred to	1	photography services for We Choose the Moon
document was marked as Exhibit M,	2	Photography's Instagram page?
and is attached hereto and made a	3	A. Yes.
part hereof.)	4	Q. Does We Choose the Moon Photography
Q. Does We Choose the Moon Photography	5	maintain its Instagram page and all of the
have an Instagram page?	6	contents on the Instagram page attributable to
A. Yes.	7	We Choose the Moon Photography, in the ordinary
Q. Are you familiar with We Choose the	8	course of its business activity?
Moon Photography's Instagram page?	9	A. Yes.
A. I am.	10	Q. Are the photographs contained in
Q. Do you advertise or promote your	11	Exhibit N true and accurate copies of
services to the public on We Choose the Moon	12	photographs of a wedding that you or someone
Photography's Instagram page?	13	acting on behalf of We Choose the Moon
A. I do.	14	Photography photographed?
O. Please take a look at Exhibit N.	15	A. Yes, but they're not all wedding
Are the screenshots contained in Exhibit N true	16	images.
and accurate copies of portions of We Choose the	17	Q. Did you or someone acting on behalf
Moon Photography's current Instagram page?	18	of We Choose the Moon Photography create all of
A. Yes.	19	the photographs contained in Exhibit N?
(Whereupon, the referred to	20	A. Yes.
document was marked as Exhibit N,	21	Q. Excluding comments by visitors to
and is attached hereto and made a	22	your website and Instagram, has any material
part hereof.)	23	been posted on We Choose the Moon Photography's
Q. If not, are the screenshots	24	website or Instagram that inaccurately describes
contained in Exhibit N true and accurate copies	25	the services that We Choose the Moon Photography
contained in Exhibit Wilde and accurate copies	20	the services that we choose the broom r hotography
34		36
of portions of posts that previously appeared on	1	offers to the public? If so, describe that
We Choose the Moon Photography's Instagram page?	2	material and how it is inaccurate.
A. It doesn't apply. It is currently	3	A. No, everything is accurate.
true and accurate.	4	THE COURT REPORTER: Okay. Those
Q. Did you or someone acting on behalf	5	are all the questions.
of We Choose the Moon Photography write the	6	
Instagram posts in Exhibit N attributable to We	7	* * *
Choose the Moon Photography?	8	(Witness Excused.)
A. Yes.	9	* * *
Q. When did you or someone acting on	10	
behalf of We Choose the Moon Photography write	11	
the statements contained in Exhibit N or approve	12	
them to be posted?	13	
A. I mean, it's over a period of time.	14	
It looks like from, you know, July, 2020. July,	15	
2020. July, 2020. August, 2020. August, 2020.	16	
September, 2020. September, 2020. September,	17	
2020. September, 2020. February of this year,	18	

17 September, 2020. September, 18 2020. September, 2020. February of this year, 19 so February, 2021. January, 2017 -- or August, 20 I'm sorry, 2017. February, 2019, I think it 21

says. July, 2018. September of '18. And June of 2020. So it looks like between 2018 and this year. Q. Is it your regular business practice to create posts like these about your

#### 9 (Pages 33 to 36)

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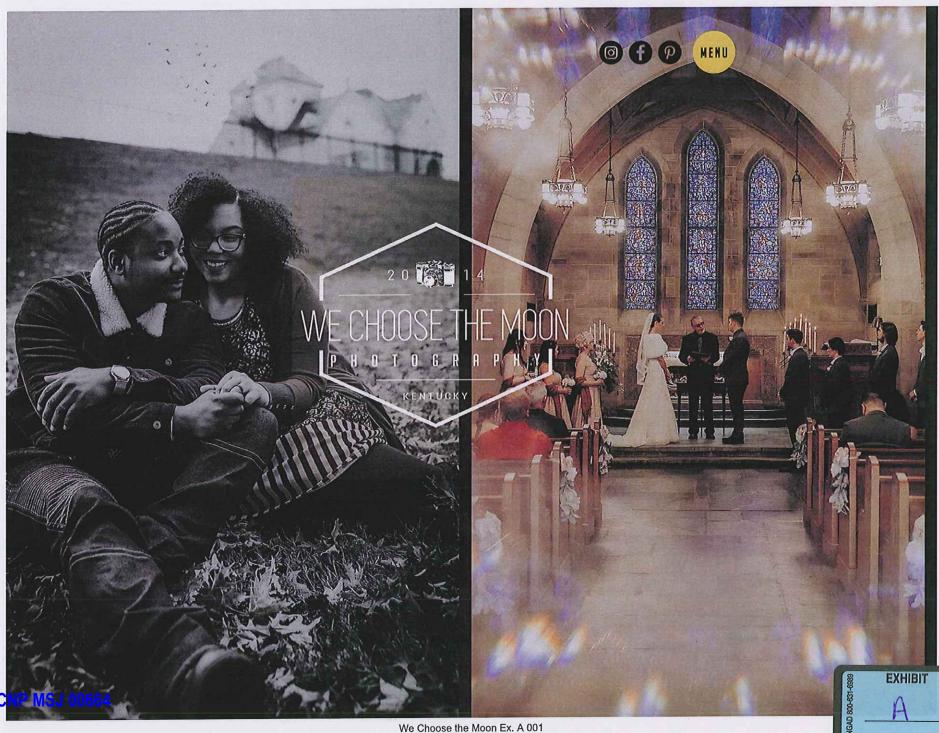
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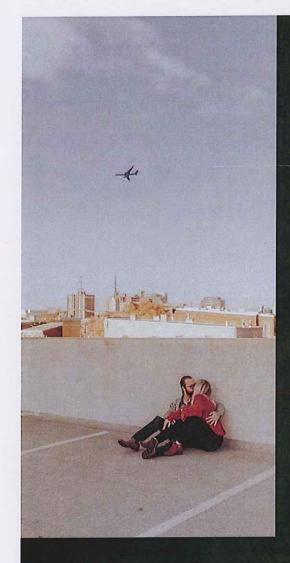
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	37	
1	STATE OF KENTUCKY )	
	) SS.	
2	COUNTY OF JEFFERSON )	
3	I, JESSICA TAYLOR ROSS, a Notary	
4	Public within and for the State at Large, do	
5	hereby certify that the foregoing deposition was	
6	taken before me, via Zoom, at the time and for	
7	the purpose in the caption stated; that the	
8	witness was first duly sworn to tell the truth,	
9 10	the whole truth and nothing but the truth; that	
10	the deposition was reduced to digital shorthand 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	
24	Notary ID 602031	
24 25	V/JR-P	
23		

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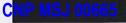
### HOT DAMN! You found me!

I'm a wedding photographer based in *LOUISVILLE, KENTUCKY* and my work is a little more modern, alternative, dark, moody, radder (however you describe it) than the rest. If you're up for a bona fide experience and wedding photos just bit different, you're in the right place.

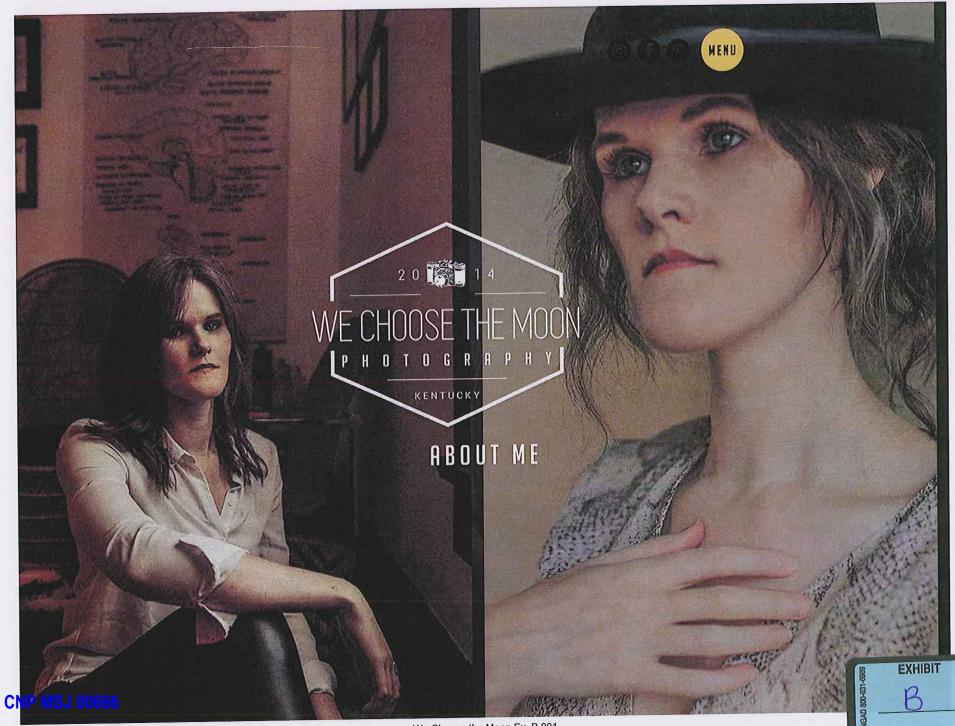
MORE INFO



# LATEST SHENANAGINS



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### Pale AF & LACTOSE INTOLORENT

I've never taken the Myers Biggs test so I couldn't tell you my personality type, but I know I'm a Virgo and born the year of the Dragon. So I guess I'm a Dragon Goddess (eat your heart out Daenerys Targaryen). I have a sun allergy which causes me to be very prone to sun burns and sun poising; so on top of the whole divinity, dragon thing I also might be part vampire.

Other than owning a camera, I also own a Bob's Burgers cookbook, a piano that's over 100 years old and more turtlenecks that one probably should.

I'm married. My pet name for him is Sparky and I referred to him, most of the time, as my Dude Man. We have two cats who love him and only put up with me. I'm slightly obsessed with consignment shopping and I've done some truly amazing things with a hot glue gun. (So I may or may not be crafty AF)



### CONFIDENCE, CONTRARY TO WHAT YOU MAY HAVE HEARD, YOU Can never have too much of it. or Bourbon.

- STERLING ARCHER -

**CNP MSJ 00667** 

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### **THINGS I LIKE**

 $\overline{FUN}$ 

The Movie "White Christmas" H. Jon Benjamin's Voice Bold Lipstick Colors Antiquing Breakfast Food Neon Lights Whiskey Sour (with the egg) My Hot Glue Gun

C

### THINGS I DON'T LIKE

"That's what he/she said" jokes Birds Homophobia Strangers who tell me to smile Woody Allen Movies Racism Neon Colors Makeup Contouring

### AN IMPORTANT NOTE

#### ANTI DISCRIMINATION

I feel it's pretty clear on my website, but in case it's not, here is it point blank: I am antiracist and anti-homophobic. I'm an inclusive photographer and I want everyone to have a seat at the table and be represented.

#### RETOUCHING / PHOTOSHOPPING

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I'm a body positive activist. Therefore, I do not photoshop anyone. I'm happy to clean up blemishes because I know those can be out of your control, but I will not photoshop or manipulate your body in anyway. Such retouching does more harm than good and I refuse to add to the problem. You're fantastic just the way you are.

#### TRAIN TRACKS

I'm not cool with taking your photo on railroad tracks. They're property of the railroad company and simply being on them is considered trespassing; and that's a felony. Additionally, its just dangerous and I will not put my clients in harms way.



### HOW I APPROACH THINGS My camera doesn't do all the work

I like contrast. I like weird (interesting) light. I even like desaturated colors sometimes. I've been told my work is moody and grainy with a film and fine art appeal. I'm ok with that; because I like grainy images. I even like blurry or slightly out of focus pictures. I'm ok with people calling my work "artsy" because I love to provide images to you that turns your hallway into a small art gallery.





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#### INSPIRATION

I'm inspired by ya'll. Even if you have the same wedding colors at the same venue the weekend after another client, your photos will be unique because I draw my inspiration FROM YOU. It's backed up with my love and admiration for film noirs movies of the 1940's & 1950's. Also paintings from the Renaissance, Barcque and Neoclassical periods. I'm also pretty intrigued with surrealism; its just so mind-blowing to me. I understand it, but I also don't understand it all. And I really dig being so lost in it.

### NOT A JOB

I am far from the vendor who will show up and do a job. Because it's not a job, its your f\*cking wedding. And while at the end of the day you are just hiring me to come take photos and document your day, I'm going to do more than that because I genuinely want you to enjoy and experience the wedding day I'm going to capture for you. I've planned a wedding myself and I know it can get really overwhelming so my goal is to be a blessing on your wedding day, not a burden.

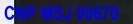
#### COMFORTABLE

The best compliments are when the bridesmaids or groomsmen (or both) think I'm on old friend of the bride or groom because of the way I interact with them or how chill they are around me. While most of the time I've known the couple for less than year and all our interaction has been wedding related, I really revel in knowing my couples feel relaxed around me. Fill be honest, having a calm demeanor is really hard work sometimes.

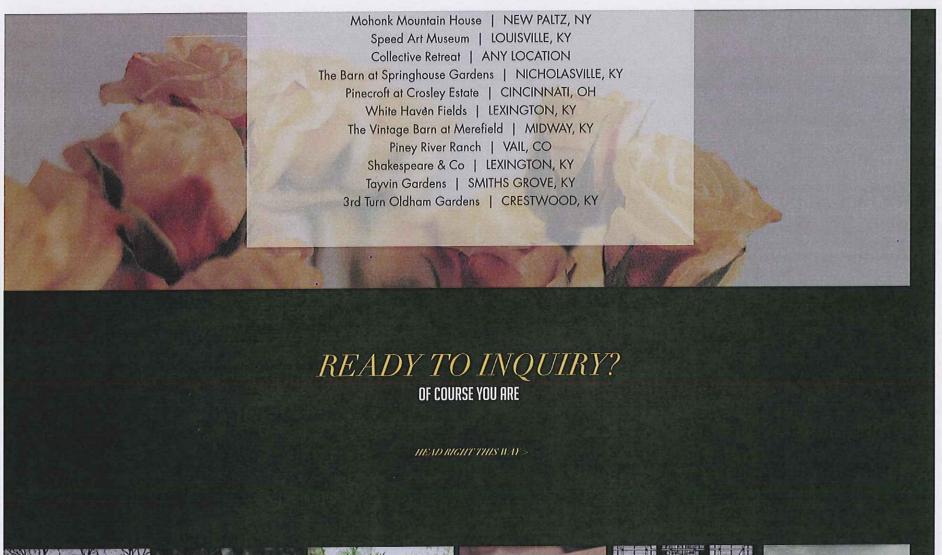
### BUCKET LIST VENUES

Here are some places I'd love to photograph a wedding! If one of these places is your venue, please let me know! I'm offering a stellar discount so I can shoot there!

> George Peabody Library | BALTIMORE, MD Story Inn | STORY, IN Warrenwood Manor | DANVILLE, KY The Foundry on Broadway | FRANKFORT, KY One World at Woolery Mill | BLOOMINGTON, IN Cason's Cove | ALVATON, KY The Ruins at Kellum Valley Farm | CLEVELAND GA Jeptha Creed Distillery | SHELBYVILLE, KY Lost River Cave | BOWLING GREEN, KY



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We Choose the Moon Ex. B 006

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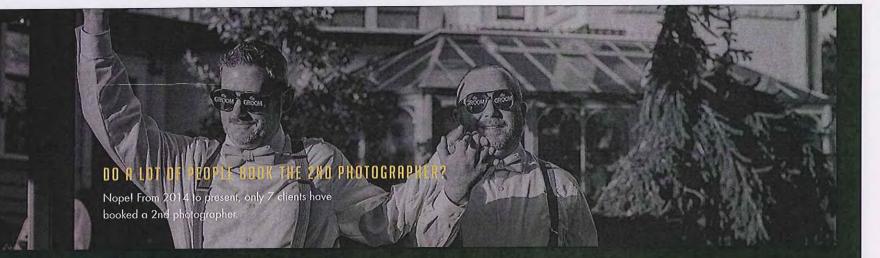


I know the wedding blogs have their opinion about what you should look for in a wedding photog and a list a questions you should ask. And that's fine. I'm happy to answer any questions if it helps you narrow down your choices! But here are some you can go ahead and mark of your list as answered. ;)



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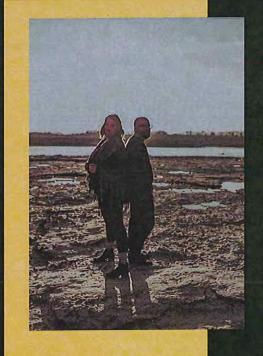
## Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 347 of 565 PageID #: 3579



### I LOVE YOUR STYLE BUT DO YOU DO ANY "Normal", more traditional photos? Because I don't see them and I know my grandma is going to want those.

Yes! While I do wedding photography a little differently, I still get some traditional portraits of you guys smiling at the camera. I want to provide images everyone in your family can love.

When we do family photos at your wedding, this is all I do. Everyone is looking their best so I want to get as many family photos as I can for you. Keeping it simple by just having everyone stand side by side, smiling at the camera, helps move through them quickly so we can all photos on your family shot list and all the last minute requests so we can get everyone to the cocktail hour to start partying.



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### HOW MANY WEDDINGS HAVE YOU PHOTOGRAPHED?

I shot my first wedding in June 2014. As of January 2020, I've photographed 80 weddings.

### DO YOU HAVE INSURANCE?

We Choose the Moon Ex. C 004

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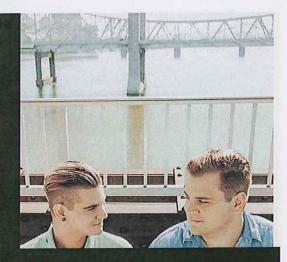
# Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 349 of 565 PageID #: 3581



Yep. I have insurance for my equipment and general liability.

#### DO YOU PHOTOSHOP?

Short answer, no. I'm a body positive activist. Therefore, I do not photoshop my subjects. I'm happy to clean up blemishes because I know those can be out of your control, but I will not photoshop or manipulate your body in anyway. Such retouching does more harm than good and I refuse to add to the problem. You're fantastic just the way you are.



### WE'RE NOT PAYING, SO Do we need to do the contract stuff?

Yep. Regardless of who is paying, you, the couple, needs to sign the contract.

#### IS THE RETAINER REFUNDABLE?

No. However, if you find you need to cancel my services with you, any payments you made (other than the retainer) is refundable if I am able to book another wedding event for your date.

### CAN I VIEW A Full/complete wedding gallery?

Yes! At our consultation, I will bring my tablet so you can view at least one full wedding gallery. Until then, you view fuller galleries on my <u>blog</u>.

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#### HOW DO WE BOOK YOU?

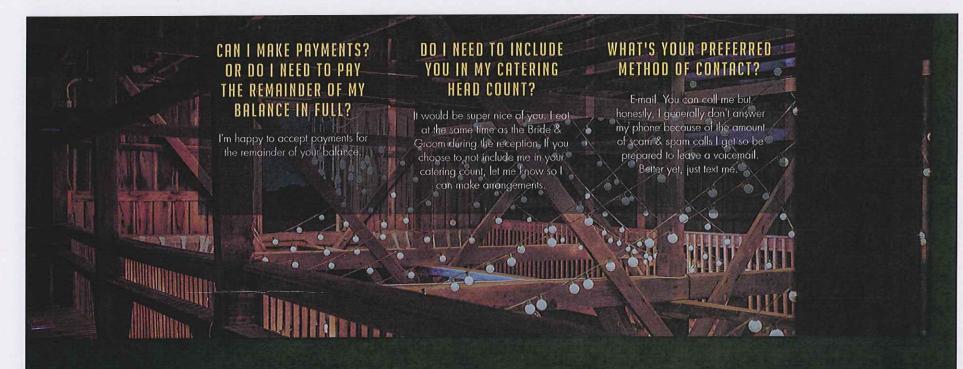
Send me an inquiry and we'll set up a consultation. After the consultation, and you decide to book me, I will email you an invoice for the retainer and contract. The retainer is 40% of the cost of your selected collection.

### WHAT HAPPENS IF YOU GET SICK THE DAY OF OUR WEDDING AND UNABLE TO COME?

There are several networks of photographers in the Louisville area I can reach out to and I have several photog friends who will step up to the plate if I need them to.

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### DIDN'T SEE YOUR QUESTION? Ask me via email or at our consultation!

IM READS TO INQUIRY



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We Choose the Moon Ex. D 001

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### 2021 & 2022 INFO & PRICING

Whether you're having a big event with ice sculptures and a celebrity chef or a friends and family only affair in your backyard, I'm happy to document it all! You do you.

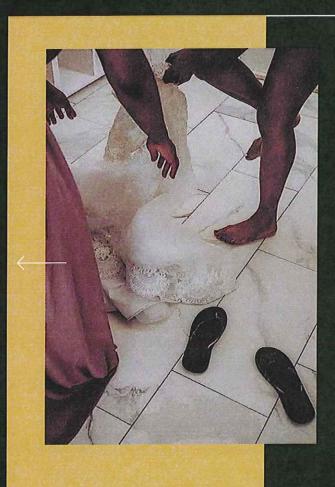
In case you missed it on the home page, I'm not a traditional wedding photographer. You'll see less perfectly posed behind your wedding cake and smiling at the camera and more of those moments that happen in between the mo<u>ments.</u>



6 HOURS - \$1900

This is the perfect amount of time for a smaller wedding (50ish guests or fewer). It's also great for those who don't need all the moments of you getting ready with your

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### COLLECTIONS & PRICING USE THE ARROWS TO BROWSE

These prices include A LOT more than just me showing up to your wedding and taking photos. You know your photos are going to mean more to you in the years to come than they will the day I deliver them to you. So you want real emotions and actual moments captured. You want artistic imagery you won't just post on social media, but will print and frame and have it displayed on the walls of your home; turning your own living space into an art gallery of your wedding day.

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NP MSJ 00681

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VIEW A WEDDLVG >

### 6 HOURS - \$1900

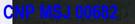
This is the perfect amount of time for a smaller wedding (50ish guests or fewer). It's also great for those who don't need all the moments of you getting ready with your friends or if you're not planning on having a big, grand exit with sparklers or the like. But I'll still be able to capture the bulk of your day, it's vibe and all those great moments.

### COLLECTIONS INCLUDE:

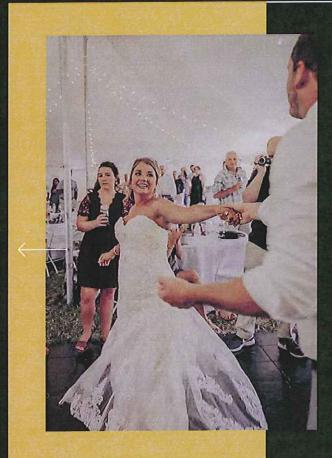
Complementary consultations and planning assistance Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights Twenty Five 5x7 Prints

ADD ONS: Engagement Session - \$300

INQUIRY FOR THIS>



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VIEWA WEDDING>

### 8 HOURS - \$2200

This is my most popular collection and great for medium sized weddings (100ish guests) or essentially want full day coverage. I'll be able to capture the bulk of your day, arriving early enough to get the last part of you and your friends hanging out, getting ready and getting dressed and most likely staying until your grand exit. And of course all those great moments in between.

#### COLLECTIONS INCLUDE:

Complementary consultations and planning assistance Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights Twenty Five 5x7 Prints

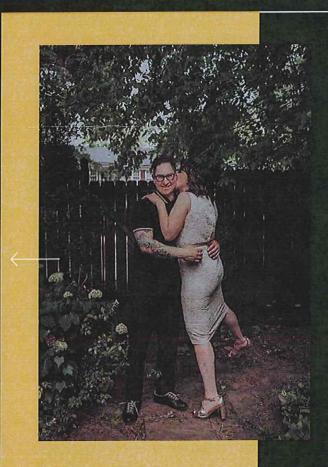
ADD ONS: Engagement Session - \$300

INQUIRY FOR THIS >

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# Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 357 of 565 PageID #: 3589



VIEW A WEDDEVG >

### 10 HOURS - \$2500

This collection was created for larger weddings or for those who want to take the guess work out of it knowing their wedding day will be fully captured! Even with a larger guest count or a bigger than usual bridal party, I'll still be able to hang out with you from basically the beginning of your day to the end.

#### COLLECTIONS INCLUDE:

Complementary consultations and planning assistance Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights Twenty Five 5x7 Prints

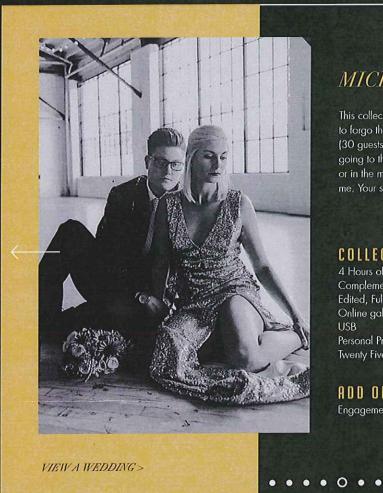
ADD ONS: Engagement Session - \$300

INQUIRY FOR THIS >

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### MICRO WEDDINGS - \$1200

This collection is specifically for those who have decided to forgo the big wedding and are just having a small (30 guests or fewer) ceremony. So whether you're going to the courthouse, your backyard, the family farm, or in the mountains of Colorado, it doesn't really matter to me. Your small ceremony has 30 guests or fewer though.

#### COLLECTIONS INCLUDE:

4 Hours of Photography Coverage Complementary consultations and planning assistance Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights Twenty Five 5x7 Prints

ADD ONS: Engagement Session - \$300



INQUIRY FOR THIS>

## Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 359 of 565 PageID #: 3591



VIEWA WEDDING>

### ELOPEMENTS - \$600

This collection is for true elopements! It'll just be the two of you and two witnesses. Whether you bring two guests with you or ask two random strangers passing by to witness is up to you! Location doesn't matter. You can get your elopement on anywhere you want!

### COLLECTIONS INCLUDE:

2 Hours of Photography Coverage Complementary consultations and planning assistance Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights Twenty Five 5x7 Prints

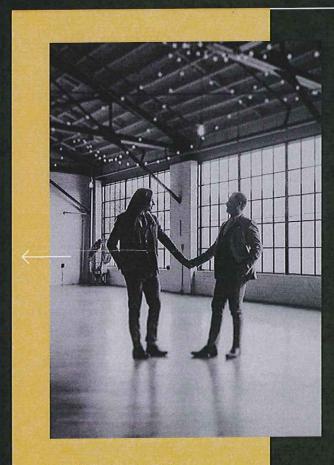
ADD ONS: Engagement Session - \$300

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VIEW AN ENGAGEMENT>

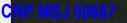
### ENGAGEMENT - \$300

You don't have to book me to photograph your wedding to also get engagement photos. These sessions are an add-on to Wedding Collections or can be booked alone!

### COLLECTIONS INCLUDE:

2 Hours of Photography Edited, Full Resolution Photos Online gallery with unlimited downloads USB Personal Printing Rights 4x6 Prints

INQUIRY FOR THIS >



We Choose the Moon Ex. D 009

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### WEDDINGS 1.5 HOURS AWAY FROM LOUISVILLE WILL HAVE A TRAVEL FEE I like to arrive at least one day before the wedding so I can see your venue and attend your rehearsal. This is also a great time for me to explore to find any local areas you want to take pictures outside of your venue. After photographing all day, I'm extremely tired and driving longer than 1.5 hours just isn't safe for me.

INFO



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Chancing & Ryan Engagement - wctmphotography

WCTMPHOTOGRA

2/24/2021

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# **CHANCING & RYAN ENGAGEMENT**

#### August 17, 2017 • wctmphotography

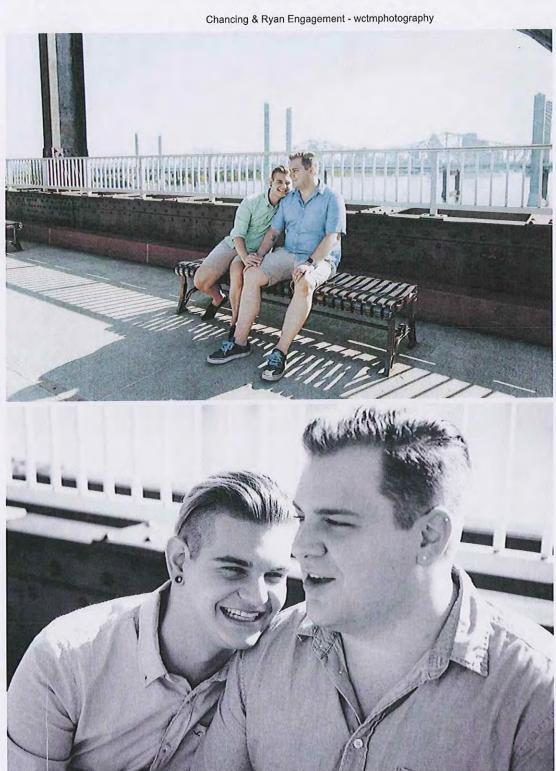
Just one of the things I love most about Chancing & Ryan is how realistic they are about life and love. While big romantic gestures are great (Ryan proposed to Chancing at Disney World in front of Cinderella's castle), they know relationships are really about putting up with each other's crazy. When I asked them if there was any defining moment they each knew they were the one, they both replied with the same, "well, he hasn't killed me yet so that's a pretty good sign…". These two got it made.  $\bigcirc$ 

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**CNP MSJ 00689** 

https://wechoosethemoon.blog/2017/08/17/chancing-ryan-enga

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#### **CNP MSJ 00690**

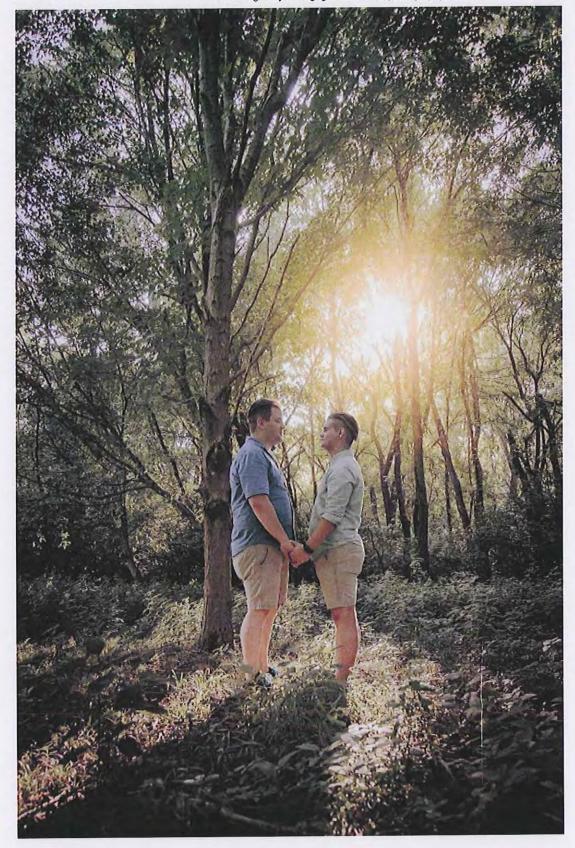
2/24/2021

https://wechoosethemoon.blog/2017/08/17/chancing-ryan-enga

## Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 364 of 565 PageID #: 3596

2/24/2021

Chancing & Ryan Engagement - wctmphotography



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#### 2/24/2021

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Chancing & Ryan Engagement - wctmphotography

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Posted in Engagement Photography, Same Sex Couple

Tagged Louisville, Louisville Couple, Louisville Engagement, Louisville Engagement Photography, Louisville KY, Same Sex Couple, Same Sex Engagement

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2/24/2021

Crystal + Sarah - wctmphotography

WCTMPHOTOGRA Q Search ... PHY

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### CRYSTAL + SARAH

June 4, 2019 • wctimphotography

I seriously can't get over these small weddings.

Don't get me wrong, I love all weddings that are reflective of my clients and all their wedding dreams. So if that's a Princess Di length veil in the biggest church in town followed by a reception at the swankiest hotel with a celebrity chef, GREAT! If that's what your wedding dreams are made of, go for it! But if your dreams are a little smaller, a little more intimate, and just eating pizza with your closet family and friends, that's fantastic as well.

These two told all their family and friends to meet them at Central Park at 4:30pm. So while they were gathering, we were doing photos around the Old Louisville neighborhood. We made our way to Central Park where they were greeted by everyone and made it official!

#### **VENDOR LOVE**//

PHOTOS// We Choose the Moon Photography <u>website</u> | <u>facebook</u> | <u>instagram</u> CEREMONY VENUE// Central Park <u>website</u> RECEPTION VENUE// Wick's Pizza (New Albany, IN location) website | facebook HAIR// Drybar <u>website</u> | <u>facebook</u> | <u>instagram</u> MAKE-UP// DIY by Bride CATERING & BAARTENDER//Wick's Pizza (New Albany, IN location) <u>website</u> | <u>facebook</u> CAKE// Mert's Cakes <u>website</u> | <u>facebook</u> DRESS// Eshakti <u>website</u> VEIL// Magic Bluebell Designs <u>website</u> SHOES// Crystal: Tomboy Toes <u>website</u> Sarah: Target <u>website</u> SUIT// Mens Warehouse website FLORAL BOUQUET// DIY by Bride, Trader Joe's & Whole Foods CENTERPIECES// Nanz & Krafts <u>website</u> | <u>facebook</u> OFFICIANT// Phillip Mallory

#### CNP MSJ 00693

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Dane & Mitchell, Couples Session - wctmphotography

#### **WCTMPHOTOGRA** PHY

2/24/2021

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**EXHIBIT** 

# **DANE & MITCHELL, COUPLES SESSION**

October 6, 2020 · wctmphotography

I came across a new location I really wanted to take photos at. In the past when this has happened, it took awhile for the right couple to come along to suggestion it. With it being 2020 and inquires for sessions being slow, I knew I couldn't wait. So, instead, I just found the right couple and made it happen. 🙂

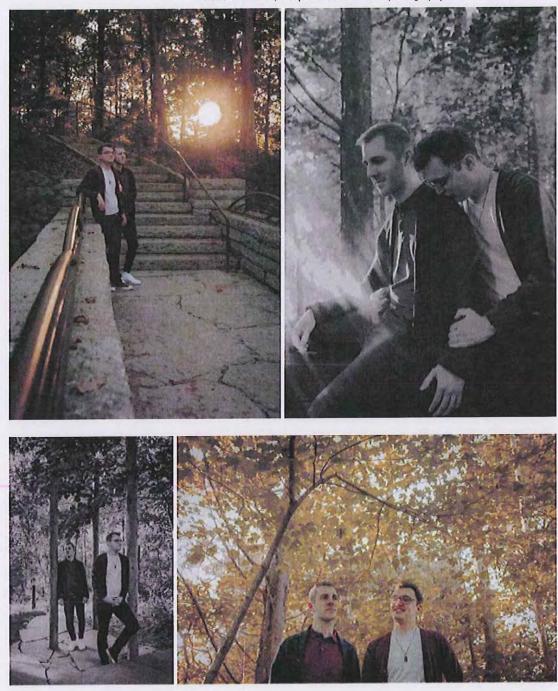


https://wechoosethemoon.blog/2020/10/06/dane-mitchell-coupletessing the Moon Ex. G 001

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2/24/2021

Dane & Mitchell, Couples Session - wctmphotography



### Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 369 of 565 PageID #: 3601

2/24/2021

Drew + Jeremy - wctmphotography

WCTMPHOTOGRA PHY

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## **DREW + JEREMY**

#### November 2, 2016 · wctmphotography

I can't express how incredibly honored I feel that I got to photography Drew & Jeremy's wedding. Jeremy inquired about photographers on a wedding facebook group we're both in. Although he got a TON of responses and recommendations, I was the one who got the gig. Once again, upon meeting Drew and Jeremy, I knew they were fun and wonderful people; but seeing all their friends and family at the wedding, I saw just how fun and wonderful they are. It's truly unbelievable how well two people compliment each other. It was also incredibly humbling getting to witness not only the wedding, but the love and support Drew and Jeremy have in their life from their friends and family. I really can't express how magical this day was and working with the grooms. These two have many many many happy years together. No doubt about it.

Photographer: We Choose the Moon Photography Website: www.wechoosethemoonphotography.com Facebook: www.facebook.com/wctmphotography Instagram: www.instagram.com/wctmphotography

Venue: Walnut Way Farms Website: www.walnutwayweddings.com Facebook: www.facebook.com/walnutwaybarnweddings Instagram: www.instagram.com/walnutwayweddings



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Drew + Jeremy - wctmphotography



CNP MSJ 00697

https://wechoosethemoon.blog/2016/11/02/drew-jeremy/ We Choose the Moon Ex. H 002

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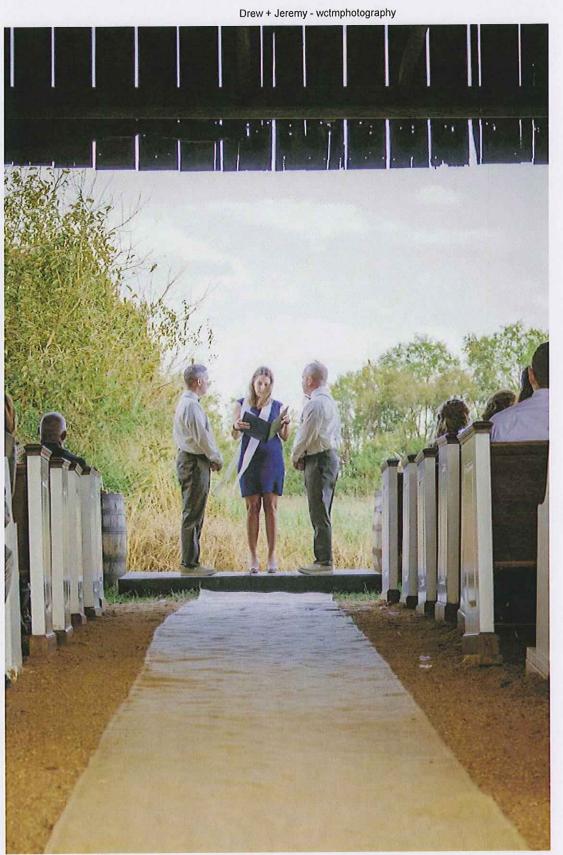
2/24/2021

Drew + Jeremy - wctmphotography



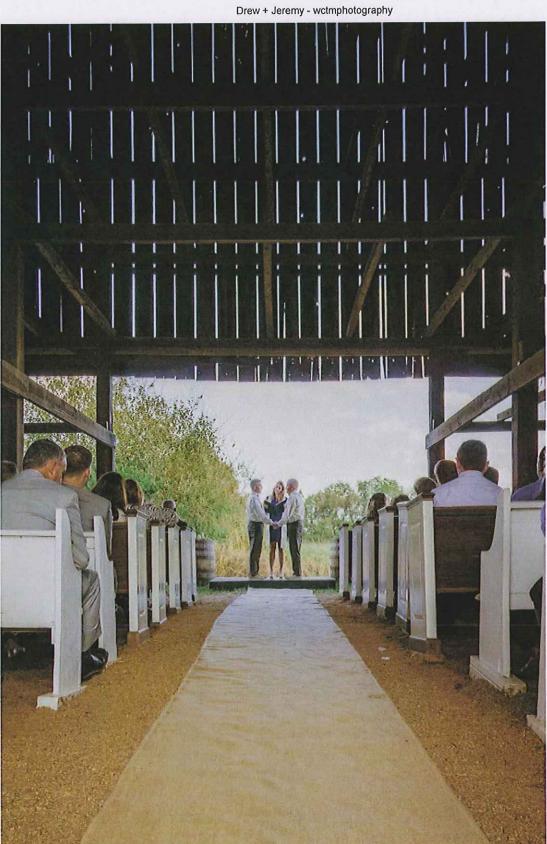
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2/24/2021



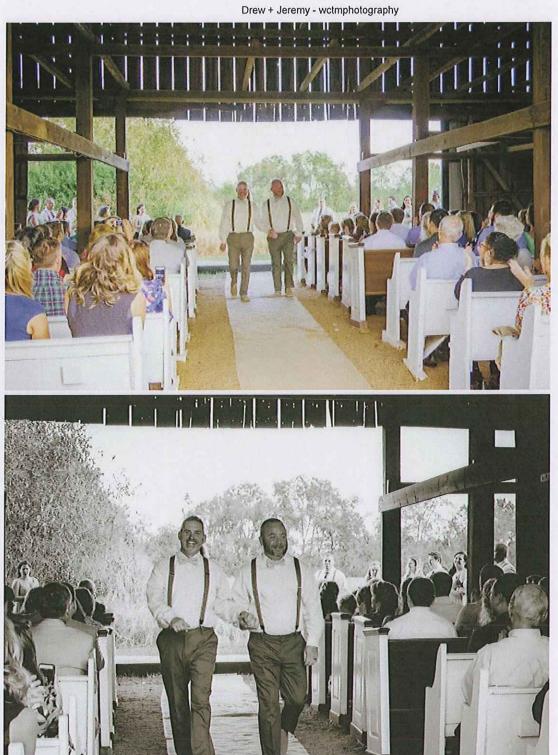
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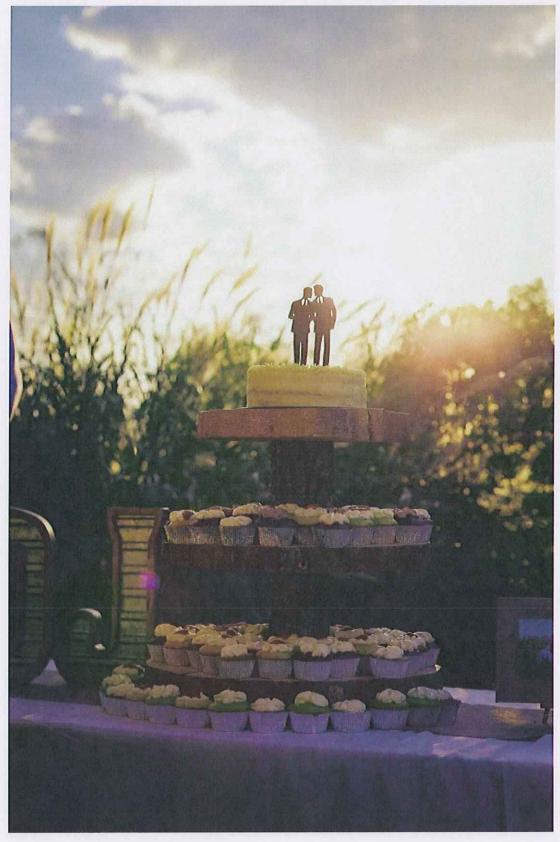
Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 374 of 565 PageID #: 3606 4/2021 Drew + Jeremy - wctmphotography

2/24/2021



# Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 375 of 565 PageID #: 3607 Drew + Jeremy - wctmphotography

2/24/2021



Kat + Kayla - wctmphotography

WCTMPHOTOGRA PHY

2/24/2021

Q Search ...

HOME CONTACT

## KAT + KAYLA

October 16, 2016 • wctmphotography

I'm not gonna lie, this is the first wedding I've photographed where I got a little teary eyed. And it wasn't even during the ceremony, it was during the toasts; toasts that were added last minute. It was Kat's parents who gave the very moving words. Although I do get to know my clients, I never get to really really know them. I 100% believe in personal privacy and never try to dig too big into their lives. I always ask basic things like "where did you meet" "what do you like to do" "I like bourbon, how about you". Although I like to have a personal connection with my clients, I don't think its my business to know what makes them tick. Afterall, I'm just some stranger you hired to take your photos. Although I knew Kat and Kayla are very kind and generous human beings, it was brought to light (at least for me) just HOW kind and generous and amazing they are; and I felt incredibly honored to be able to not just photograph their wedding, but to also be present at the union of these two kind souls.

Also they had freakin' doughnuts instead of wedding cake and I firmly believe that's something that needs to happy more often.

Best wishes and many happy years ahead you!

Photography: We Choose the Moon Photography (Website/Facebook/Instagram) Venue: Cedar Ridge Camp (Website/Facebook) Catering: Younique Soul (Website/Facebook) Bar Service: Twisted Sisters Bar Service (Facebook) Doughnuts: Nord's Bakery (Website/Facebook) Hair & Make-up: Brittany Denise



CNP MSJ 00703 https://wechoosethemoon.blog/2016/10/16/kat-kayla/

We Choose the Moon Ex. I 001

## Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 377 of 565 PageID #: 3609

2/24/2021

Kat + Kayla - wctmphotography



### Case 3:19-cv-00851-BJB-CHL Document 92-7 Filed 09/01/21 Page 378 of 565 PageID #: 3610

LBGTQ Couples Shootout & Workshop - wctmphotography



2/24/2021

Q Search ...

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## **LBGTQ COUPLES SHOOTOUT & WORKSHOP**

#### July 13, 2018 • wctmphotography

At the beginning of the year I had A LOT of photographers reach out to me about working with and posing same-sex couples. It was exciting to know so many photogs want to work with these couples and offer their photography services to them but it was clear they were nervous about it and unconfident about posing them.

I'm not by any means an expert in the area of posing but I felt if people were reaching out to me for advice and knowledge I could do my very small part to help.

I picked out a stunning venue (The Pointe) so we could shoot inside (It gets ungodly hot in Kentucky sometimes), rented a few props and Brandi Potter (my co-host), wrangled up two gorgeous couples to model for us.

I broke the event into two parts: a shootout and workshop.

The Shootout was open for 2 hours to photographers who just wanted to work with the couples and build their portfolio. The Workshop was afterwards and was also 2 hours long where Brandi and I mentored photographers who left they were on the struggle bus when it comes to posing same-sex couples.

I think the biggest takeaway is you pose and prompt your LBGTQ couples just like your heterosexual couples.

VENUE// The Pointe <u>website facebook instagram</u> RENTALS// Beck and Call Vintage Rent Shop <u>website facebook instagram</u> DRESS// Kimberly Phillips Clothier <u>website facebook instagram</u> FLOWERS// Sticks and Stems <u>website facebook instagram</u>

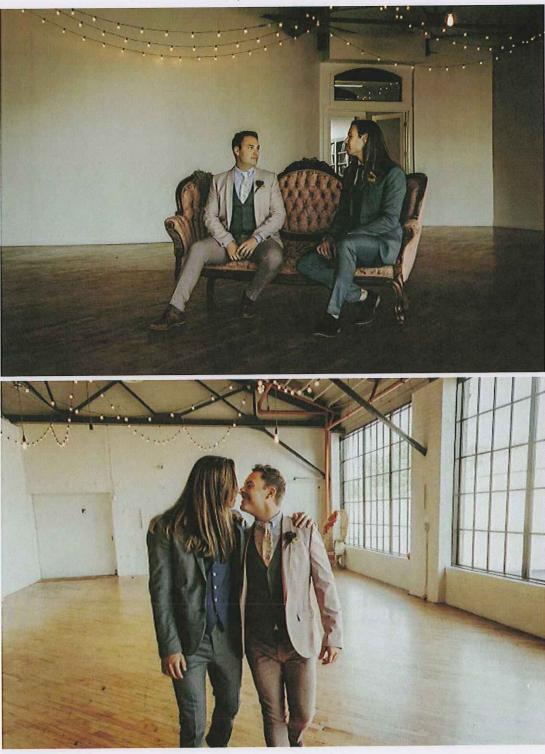
Here are some photos I snapped:



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2/24/2021

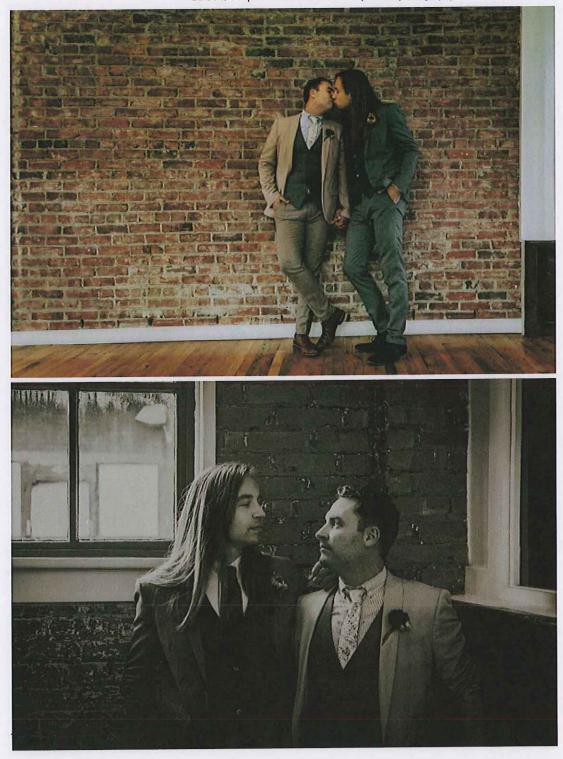
LBGTQ Couples Shootout & Workshop - wctmphotography



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2/24/2021

LBGTQ Couples Shootout & Workshop - wctmphotography



2/24/2021

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**WCTMPHOTOGRA** 

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## LBGTQ+ COUPLE SHOOTOUT

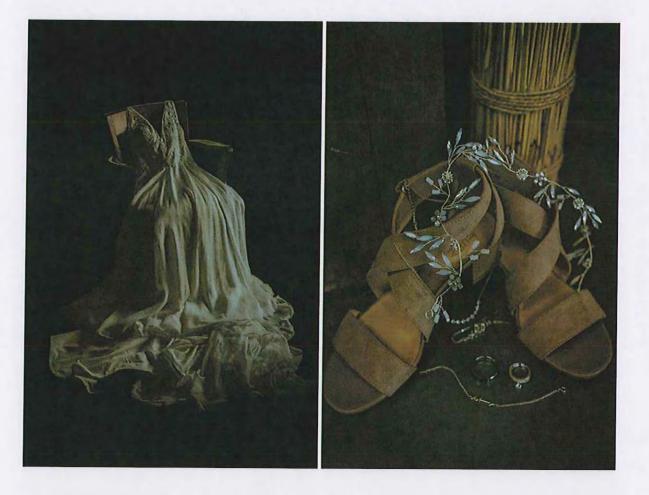
December 18, 2018 • wctmphotography

I attended a shootout (a gathering of photographers all photographing the same subject) hosted by Brandi Potter of Brandi Potter Photography. This was the first of many to come to help photographers not only build their portfolio, but also show LBGTQ+ couples they are same-sex friendly and happy to photograph their engagements and weddings! Here's what I snapped!

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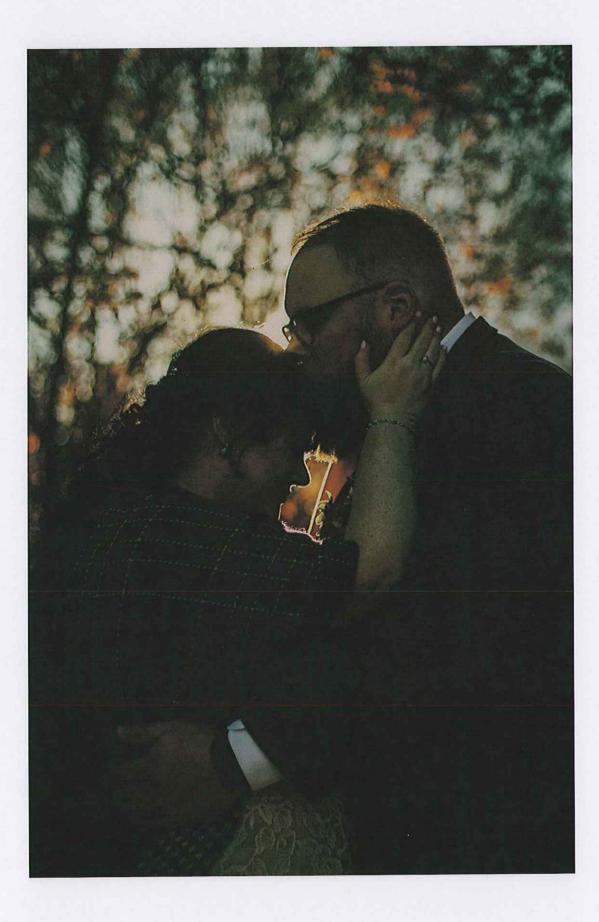
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#### **CNP MSJ 00716**

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#### **CNP MSJ 00718**

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3/1/2021

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#### § 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)

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