

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA
MACON DIVISION**

ASHLEY DIAMOND,	:	
	:	
Plaintiff,	:	
	:	Civil Action No.
v.	:	5:20-cv-00453-MTT
	:	
TIMOTHY WARD, <i>et al.</i> ,	:	
	:	
Defendants.	:	

NOTICE OF FILING COUNTER DEPOSITION DESIGNATIONS

Defendants Sharon Lewis, Ahmed Holt, Robert Toole, Brooks Benton, Grace Atchison, and Lachesha Smith, through counsel, submit the following counter page and line designations to Plaintiff’s designations (Doc. 192). Defendants reserve all objections to the use of deposition testimony as substantive evidence.

<u>Deposition</u>	<u>Page / line</u>
June 30, 2022 Deposition of Will F. Ausborn	116 l. 20 – 126 l. 15 127 l. 9 – 133 l. 1
May 10, 2021 Deposition of Tamara Cantera	78 l. 21 – 81 l. 16 82 l. 23 – 83 l. 6 84 l. 3 – 90 l. 22 92 l. 14 – 115 l. 7 120 l. 1 – 122 l. 6 128 l. 17 – 129 l. 18
May 11, 2021 Deposition of Daniel F. Fass	63 l. 5 – 72 l. 4 72 l. 20 – 82 l. 19

May 10, 2021 Deposition of Tia Fletcher	106 l. 8 – 143 l. 17
February 25, 2022 Deposition of Porsche Moody	59 l. 13 – 64 l. 19
	66 l. 25 – 79 l. 8
	82 l. 18 – 83 l. 20
	84 l. 6 – 86 l. 3
	87 l. 21 – 88 l. 6
February 24, 2022 Deposition of Gerilyn Pepin	98 l. 7 – 107 l. 17
	110 l. 17 – 116 l. 8
	116 l. 15 – 119 l. 11
May 11, 2021 Deposition of David S. Roth	109 l. 12 – 141 l. 19
	147 l. 21 – 147 l. 23

Respectfully submitted,

Christopher M. Carr 112505
Attorney General

Loretta L. Pinkston-Pope 580385
Deputy Attorney General

s/ Roger A. Chalmers
Roger A. Chalmers 118720
Senior Assistant Attorney General

PLEASE ADDRESS ALL
COMMUNICATIONS TO
Roger A. Chalmers
State Law Department
40 Capitol Square SW
Atlanta, GA 30334
Tel: (404) 458-3220
Fax: (404) 651-5304
Email: rchalmers@law.ga.gov

CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed the foregoing pleading with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to the following attorneys of record:

Emma Lee Douglas
Andrea Chinyere Ezie
Bruce Warfield Hamilton
Elizabeth Littrell
Scott D. McCoy
Caitlin Joy Sandley

This 21st day of December, 2022.

s/ Roger A. Chalmers
Roger A. Chalmers