

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA**

<b>BRIANNA BOE, <i>et al.</i>,</b>	)	
	)	
<b>Plaintiffs,</b>	)	
	)	
<b>v.</b>	)	<b>Case No. 2:22-cv-0184-LCB</b>
	)	
<b>STEVE MARSHALL, <i>et al.</i>,</b>	)	
	)	
<b>Defendants.</b>	)	

**SUPPLEMENT TO RESPONSE TO  
MAY 17, 2024 ORDER TO SHOW CAUSE**

Respondent Attorneys **James Esseks, Carl Charles, and LaTisha Faulks** (“these Respondent Attorneys”) and non-party **Milo Inglehart** submit this supplemental response to this Court’s Order of May 17, 2024, directing them to show cause why they should not be sanctioned for violating the Panel’s July 8, 2022 court order. (Doc. 527). In addition to the other grounds raised in their initial response to this Court’s show cause order (Doc. 529), these Respondent Attorneys and Mr. Inglehart offer the following:

The Panel formally released former respondent Milo Inglehart from any previous obligation to produce the Q & A document when they entered their order of September 23, 2022 terminating Mr. Inglehart as a respondent. (*Vague* Doc. 59). In that order, the Panel expressly “**RELEASE[D]**” Mr. Inglehart “**from any**

**obligation under the May 10, 2022 and July 8, 2022 Orders.”** (*Id.* (emphasis added)). As this Court is aware, the referenced July 8, 2022 order is the order that initially required Mr. Inglehart to produce the Q & A. (*Vague Doc. 22*). The Panel’s September 23, 2022 order was entered **after** Mr. Inglehart and his counsel had expressly indicated that the Q & A document was being withheld from production because it was a “privileged communication.” It is hard to imagine a clearer indication that the Panel had abandoned any previous efforts to require the production of the Q & A and that neither Mr. Inglehart nor these Respondents are in violation of the Panel’s July 8, 2022 order.

/s/ Barry A. Ragsdale

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Charles, and Faulks and non-party  
Milo Inglehart.*

**CERTIFICATE OF SERVICE**

I certify that, on May 21, 2024, I electronically filed a copy of the foregoing with the Clerk of Court using the CM/ECF system, which will provide notice of such filing to all counsel of record.

/s/ Barry A. Ragsdale  
OF COUNSEL