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CCB STANDARD REQUESTS TO PRODUCE DOCUMENTS
Documents to Be Produced by Parties Defending Against an Infringement Claim

These are the CCB's standard document requests to a party defending against an allegation of copyright infringement (including parties who have brought a claim for a declaration of noninfringement). You must produce to the other parties, by the deadline set by the CCB in the scheduling order, copies of:

1. All documents you are likely to use in support of your claims, counterclaims, or defenses. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
2. All documents you are going to use or are likely to use to disprove the other party's/parties' allegation of infringement and damages or harm. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
3. All other documents you are reasonably aware of that conflict with your claims, counterclaims, or defenses. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
4. All documents you referred to in, or used when preparing, any of your responses to the CCB's standard interrogatories. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
5. Copies showing all versions of your work(s) that allegedly infringes the claimant's(s')/ counterclaimant's(s') work(s). All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
6. All documents and communications (with anyone) referring or related to the other party's(ies') allegedly infringed work(s), or your use of their work(s) alleged in this proceeding. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
7. Documents related to the creation of your work, including documents showing or negating your rights to use the allegedly infringing material or showing or negating your original creation of the allegedly infringing material. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
8. If you attempted to register the work(s) of yours that the other party(ies) allege infringes their work, documents related to the registration, application for registration or denial of registration of your work(s). Not Applicable, I did not do this.
9. Documents related to your right to use the other party's(ies') allegedly infringed work(s) or the elements of your work(s) that the other party's/parties' alleges amounts to infringement. Not Applicable, I did not receive the right to use the work of Michael Russell.
10. All communications with the other parties about the work(s) at issue in this proceeding or directly related to your claim or counterclaim of infringement. The only communication has been via email and following CCB standards with Ms. Burns.
11. All agreements or licenses with any of the parties in this proceeding about the work(s) at issue in this proceeding. Not Applicable.

12. Documents sufficient to show where you published your work(s)that the other party(ies) alleges is an infringement. All defense documents previously provided to Ms. Burns in Interrogatories Discovery Process entitled Copyright Defense Discovery via link to my private Google Drive.
13. Documents showing your access to the other party's/parties' allegedly infringed work(s). Not Applicable, I don't have this.
14. All takedown notices or counter-notices you have sent to any online service provider (examples: YouTube, Facebook) about the alleged infringement(s) at issue in this proceeding. Not Applicable.
15. If you have brought a claim for a declaration of noninfringement, all documents showing that there is a genuine legal dispute between you and the other party/parties. Not Applicable.
16. If you are responding to an infringement claim or counterclaim, documents sufficient to show: a. the revenues and profits including, for example royalties that you received that were directly related to the sale, licensing, or use of the allegedly infringing material(s) Not Applicable, no revenues have been earned by the use of Michael Russell photo.
    a. Give the full name of each person you plan to use in the proceeding as a witness. Include their phone number, mailing address, and email address, if you know it. Include a brief description of the topics on which they may give a witness statement in this proceeding. I, Jesse Ferrell is the only witness I plan to use in the proceeding.
    b. the deductible expenses, such as the cost of producing the allegedly infringing material(s) directly related to that sale, licensing, or use, and Not Applicable.
    c. the elements of profit for that sale, licensing, or use that result from factors other than the other party's/parties' copyrighted work(s), such as from the aspects of your work(s) not included in the work(s) of the other party(ies). Not Applicable.

Certification of Discovery Responses

Please include a signed copy of this form with your discovery responses

I, Jesse Ferrell, certify that in an effort to adequately respond to the document requests, I have made a reasonable investigation of files in my possession or under my control, including the files of any of my agents, employees, representatives, or others acting on my behalf who I reasonably believe may have responsive documents. I further affirm that the produced documents are genuine and unaltered to the best of my knowledge.



September 4, 2024

Signature **Date**

Proof of Delivery

I hereby certify that on Thursday, December 12, 2024, I provided a true and correct copy of the Ex. A Copyright CCB Standard Requests to Produce Documents to the following:

JessTalk Speaking Services, LLC, represented by Jesse Ferrell, served via ESERVICE at speak@jesstalk.com

Signed: /s/ Leslie Burns