

Exhibit

6

- October 24, 2023 (in-person) – AOC Deputy Director Rachel Harmon
- October 25, 2023 (in-person) – Defendant AOC Director Michelle Long
- November 16, 2023 (in-person) – AOC liaison Michelle Consiglio-Young
- November 21, 2023 (remote) – Lang Wiseman, Defendant’s Expert

4. Prior to the scheduled depositions of Chief Justice Kirby, Justice Bivins, Justice Page, and Special Justice Lee (collectively “Justices”), I instructed my employer, Liberty Justice Center, to tender \$40 checks to the Justices’ counsel for their attendance at the noticed depositions on November 27, 28, 29, and 30.

Attached as **Exhibit A** are copies of the checks, along with my correspondence.

5. On November 21, 2023, at approximately 1:30 pm CDT, I along with my colleague, James McQuaid, participated in a video conference call with counsel for the Justices regarding their Motion to Quash depositions. Counsel for the Justices participating on the call included Donna Green, Cody Brandon, and Liz Evan. I do not recall counsel for Defendant Michelle Long (Andrew Coulam, Michael Stahl, and Robert Wilson) participating on this video call.

I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.

Executed on November 27, 2023
Lakeland, Tennessee



M. E. Buck Dougherty III
LIBERTY JUSTICE CENTER

Exhibit

A

LIBERTY JUSTICE CENTER

440 N WELLS ST STE 200
CHICAGO, IL 60654-4550

1078

70-480/819 IL
11978DATE Nov 10, 2023PAY TO THE
ORDER OFChief Justice Holly Kirby\$ 40.00Forty and 00/100

DOLLARS

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440 N WELLS ST STE 200
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ORDER OFJustice Roger Page\$ 40.00Forty and 00/100

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BANK OF AMERICA

ACH R/T 081904808

McCauley v. LongFOR daily witness fee-deposit

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ORDER OFJustice Jeffrey Brune\$ 40.00Forty and 00/100

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11978DATE Nov 10, 2023PAY TO THE
ORDER OFJustice Shannon Lee\$ 40.00Forty and 00/100

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BANK OF AMERICA

ACH R/T 081904808

McCauley v. LongFOR daily witness fee-deposit
pursuant to 28 C.S.C. R21

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10 November 2023

Donna L. Green, Managing Attorney
Law Enforcement and Special
Prosecutions Division
Office of the Tennessee Attorney General
P.O. Box 20207
Nashville, Tennessee 37202-0207

RE: Daily witness deposition fee pursuant to 28 U.S.C. 1821
McCaleb v. Long No. 3:22 -cv-00439

Dear Ms. Green,

Enclosed, please find four checks in the amount of \$40.00 each made out to the following pursuant to 28 U.S.C 1821 daily witness deposition fees:

1. Chief Justice Holly Kirby
2. Justice Roger Page
3. Justice Jeffrey Bivens
4. Justice Sharon Lee

Sincerely,

M.E. Buck Dougherty, III
Senior Counsel
Liberty Justice Center