

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA,

v.

JEFFREY B. CLARK, ET AL.,

Defendants

Case No.

23SC188947

**ADOPTION OF PRESIDENT TRUMP'S MOTION TO
COMPEL**

Comes Now Jeffrey Bossert Clark, Defendant in the above-entitled matter, and hereby adopts the Motion to Compel filed by President Donald J. Trump on January 8, 2024.

In further support of the motion, Mr. Clark notes that the response from the District Attorney's office as to the meaning of the notation next to the names of Mr. Rosen and Mr. Donoghue on the State's witness list, "(Video presentment/review)" came December 27, 2023, after having been first requested on November 29, 2023, and only after follow-up emails on December 11, 14, and 20.

In addition, the response is cryptic as to what video testimony was shown to the Special Purpose Grand Jury. Mr. Rosen and Mr. Donoghue have each testified before three Congressional Committees, and each twice before the January 6 Committee, once privately and once publicly. Nor is it clear whether they were shown excerpts or the entirety of their public or private testimony, or the entirety of the public hearing at which

they testified, which contains substantial additional material beyond their testimony, such as narrative summaries by members of the Committee, video excerpts from multiple depositions and interviews, visual aids, etc.¹ President Trump's motion should be granted to bring clarity to these issues.

Respectfully submitted, this 8 day of January, 2024.

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¹ Mr. Clark reserves all legal and evidentiary objections to the presentation in this case of any material or reports from the January 6 Committee, including but not limited to the legality of its formation and composition, the legality of its deposition subpoenas and the admissibility of any interview or deposition testimony obtained by the committee. Mr. Clark also reserves all objections to the admissibility in this case of testimony obtained or reports prepared by other Congressional Committees.

CERTIFICATE OF SERVICE

I hereby certify that on this 8 day of January, 2024, I electronically lodged the within and foregoing *Adoption of President Trump's Motion to Compel* with the Clerk of Court using the PeachCourt eFile/GA system which will provide automatic notification to counsel of record for the State of Georgia:

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