

EXHIBIT 1

DEFINITIONS

1. “You” and any variation of the word “you” refer to Darra Woolman, former employee of Coxwell & Associates, PLLC.
2. “Mississippi Today” refers to Deep South Today d/b/a Mississippi Today and any of its employees, officers, and directors.
3. “Person(s)” shall mean all individuals and entities, including sole proprietorships, associations, companies, partnerships, joint ventures, corporations, individuals, and other juridical entities.
4. “Communication” includes face-to-face oral discussion, telephonic discussion, written exchanges, e-mail, text messages, voice messages, direct messages, messages transmitted via encrypted messaging service, messages transmitted via messaging application (such as WhatsApp or other similar applications), and all other electronic communications.
5. “Documents and things” is used in its broadest sense and includes, but is not limited to, any printed, typewritten, handwritten, graphic or recorded matter of any type and description, however denominated and however and by whomever prepared, recorded, produced, reproduced, disseminated or made, including, but not limited to, the following: Any letter, telephone bill, calls, minutes, resolutions, telegrams, cables, teletypes, report, chart, affidavit, statement, accountants’ statement, financial statement, bank records, book of account, ledger, work sheet, balance sheet, information sheet, data sheet, log book, journal, list, book, manuscript, desk calendar, appointment book, diary, business records, personal records of employees, opinion, memorandum, summary or record or tape recording or transcript of any conversation or meeting, notes, notebooks, paper, photograph, audio or video tape, recording, microfilm, microfiche, study, contract, written

agreement, check, receipt, invoice, bill, computer printout, communication, summary of interview, report and/or summary of investigations, and/or any other writing of whatever description, including computer tapes, computer cards, disk, diskettes, any information contained in any computer although not yet printed and any draft, carbon, photographic copy, preliminary take or version of any such material the contents of which differs in any respect from the original.

6. “Electronically stored information” is used in its broadest sense and includes, but is not limited to, emails; text messages; chats over cellular phones or other devices or applications; photographs, videos, or audio recorded by a device; metadata recording telephone call time, length, involved numbers; programs, including artificial intelligence, used to record and/or transcribe communications; documents created in programs such as Microsoft Word, Excel, PowerPoint, Access, Corel WordPerfect, Adobe Acrobat, and other formats of documents; and articles, photographs, or comments posted on social media applications or sites, blogs, or other internet sites. The electronically stored information is requested without regard to where it may have been created or where it may currently reside, including, but not limited to, laptop computer hard drives, network servers, mobile devices, cell phones, tablets, websites for particular applications, external hard drives, off-site storage (e.g., “cloud” storage, such as iCloud, OneDrive, Google Drive, DropBox, Box) and third-party messages applications such as WhatsApp, Signal, and Telegram.

7. Something “relating to” or which “relates to” any given subject means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is in any way pertinent to that subject.

8. “Confidential file materials” means the communications, documents and things, and electronically stored information that you had access to because of your employment with Coxwell & Associates, PLLC, and that you provided to Mississippi Today and/or Anna Wolfe.

**COMMANDS TO PRODUCE COMMUNICATIONS, DOCUMENTS AND THINGS,
AND ELECTRONICALLY STORED INFORMATION MADE UNDER MISS. R. CIV. P.
45(a)(1)(C)**

You were employed by Coxwell & Associates, PLLC, when its attorneys represented former Mississippi Department of Human Services (“MDHS”) Executive Director John Davis. The plaintiffs understand that you leaked confidential file materials to Mississippi Today and Anna Wolfe while you were employed with Coxwell & Associates, PLLC, and that your leak of these confidential file materials resulted in Coxwell & Associates, PLLC, terminating your employment. This subpoena relates to your production of these confidential file materials to Mississippi Today and Wolfe.

1. Produce all communications, documents and things, and/or electronically stored information that you provided to Mississippi Today and/or Anna Wolfe while you were employed by Coxwell & Associates, PLLC.

2. Produce all communications, documents and things, and/or electronically stored information that you received from Mississippi Today and/or Anna Wolfe while you were employed by Coxwell & Associates, PLLC.

3. Produce all communications, documents and things, and/or electronically stored information that you have provided to Mississippi Today and/or Anna Wolfe after Coxwell & Associates, PLLC, terminated your employment.

4. Produce all communications, documents and things, and/or electronically stored information that you have received from Mississippi Today and/or Anna Wolfe after Coxwell & Associates, PLLC, terminated your employment.

5. Produce all communications, documents and things, and/or electronically stored information related to your leaking of communications, documents and things, and/or

electronically stored information to Mississippi Today and/or Anna Wolfe, without regard to date, recipient, or sender.

6. Produce all communications, documents and things, and electronically stored information related to the following:

- a. Former Governor Phil Bryant;
- b. Former First Lady Deborah Bryant;
- c. Former MDHS Executive Director John Davis;
- d. Nancy New;
- e. Zach New;
- f. Jess New;
- g. Jake VanLandingham;
- h. Prevacus;
- i. The volleyball stadium constructed on the campus of the University of Southern Mississippi;
- j. Temporary Assistance for Needy Families (“TANF”) funds;
- k. any other funds administered or controlled by MDHS;
- l. any and all communications you had with Merrida Coxwell and/or Chuck Mullins relating to your leak of confidential file materials;
- m. any and all communications you had with anyone relating to your leak of confidential file materials;
- n. your reason(s) and motivation(s) for leaking confidential file materials to Mississippi Today, Anna Wolfe, and/or anyone else;
- o. Mississippi Today;

- p. Anna Wolfe;
- q. Adam Ganucheau;
- r. Mary Margaret White; and
- s. any money or other thing of value that you received in exchange for leaking

confidential file materials to Mississippi Today and/or Anna Wolfe

7. Produce for inspection and download all devices containing electronically stored information that you obtained from Coxwell & Associates, PLLC, and provided to Mississippi Today and/or Anna Wolfe, including, but not limited to, mobile telephones, computer hard drives, network servers, and tablets.

8. Produce all communications, documents and things, and electronically stored information related to any effort that you undertook or that others undertook to remove electronically stored information from any computer owned by Coxwell & Associates, PLLC.