

EXHIBIT B

Plaintiff's First Request for Production of Documents and Proof of Service
for Defendant Julie Marcus

PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS

To Defendant: Julie Marcus

From: Plaintiff John Liccione

Case No.: 24-003939-CI, *John Liccione vs Julie Marcus, et al*

Plaintiff John Liccione hereby submits to Defendant Julie Marcus, Pinellas County Supervisor of Elections, this first Request for Production of Documents.

All non-privileged computer session and transaction logs and reports which captured and stored the computer forensic details, metadata, and voter data which together serve to document the submittal of vote-by-mail ballot requests to Pinellas County Supervisor of Elections' (SOE) computer systems directly over the Internet or otherwise, or indirectly through the computer systems of the SOE's contractors, or, loaded via physical insertion of removable storage devices (i.e., thumb drives, portable hard drives), **solely on the date of June 23, 2024:** Said metadata and data to include but not be limited to the following:

1. The source IP addresses of all vote-by-mail ballot requester user sessions and submittal transactions that resulted in the successful or unsuccessful submittal of vote-by-mail ballot requests.
2. The names, and addresses of the submitters.
3. The type of web client used to submit the requests.
4. The date/time of submittal.
5. The names and versions of each software application used to receive, process, store, and report out the above ballot requests, as was fielded in production on the date of June 23, 2024, and any subsequent versions the applications may have been updated to or roll-ed back from after June 23, 2024.
SOE and contractor firewall logs which captured and recorded the above vote-by-mail ballot submittal sessions.

If Defendant Marcus or any SOE vendor working for SOE, such as VR Systems, claims privilege over any such data as legal grounds for not complying with this request, state the nature and legal grounds for the privilege and the reason which such information cannot be provided if maintained under court seal.

Respectfully submitted,

A handwritten signature in black ink that reads "John W. Liccione". The signature is written in a cursive, flowing style.

John W Liccione

Plaintiff, Pro Se

443-698-8156

jliccione@gmail.com

September 11, 2024

1197966 -A

SPECIAL PROCESS SERVICE

**Pinellas County, Florida
Bob Gualtieri, Sheriff**

RETURN OF SERVICE	
Court	IN THE CIRCUIT COURT OF THE 6TH JUDICIAL CIRCUIT IN AND FOR PINELLAS COUNTY, FLORIDA
Plaintiff	John William Liccione
Defendant	Julie Marcus; et al
Person to be Served	Julie Marcus
Manner of Service	Substitute
Documents	Summons; Complaint; Exhibits; Cover Sheet; PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
Case #	24-003939-CI
Hearing Date	
Came to Hand Date/Time	9/12/2024 6:54 AM
Service Date/Time	9/12/2024 9:32 AM
Service Fee	\$140.00


On 9/12/2024 at:
Pinellas County Supervisor of Elections, Election Service Center, 13001 Starkey Rd., Largo, FL 33773 | served
Julie Marcus by:

Personally leaving 1 copy(ies) of **Summons, Complaint, Exhibits, Cover Sheet and PLAINTIFF'S FIRST REQUEST FOR PRODUCTION OF DOCUMENTS** at his/her usual place of abode with **Casey Speagal**, who is 15 years of age or older, a person residing therein of who confirmed the Defendant resides at the above address and informed that person of the contents thereof, with the date and hour of service endorsed thereon by me.

THE DESCRIPTION OF THE PERSON WITH WHOM THE COPY OF THIS PROCESS WAS LEFT IS AS FOLLOWS:
I delivered the documents to **Casey Speagal** who identified themselves as the authorized to accept with identity confirmed by subject stating their name. The individual accepted service with direct delivery. The individual appeared to be a brown-haired white female contact 35-45 years of age, 5'8"-5'10" tall and weighing 180-200 lbs. This location is a Pinellas county government agent Casey Spiegel is authorized to accept

Notary not required pursuant to F.S. 92.525(2).

I am over 18 years of age, not a party to nor interested in this case and I have the proper authority in the jurisdiction where I effected service, pursuant to Florida Statute Chapter 48. Per 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.


19948
9-13-24

John Shultz
Process Server ID
Date Executed

Ref REF-17103154

Tracking # 0142817423



 John Liccione
John@votaliccione.org

