

**IN THE FIFTEENTH JUDICIAL CIRCUIT  
IN AND FOR PALM BEACH COUNTY, FLORIDA**

LARRY KLAYMAN

AND MEMBERS OF THE PUTATIVE CLASS

Plaintiff

v.

PGA TOUR, et al

Defendants.

**Case No: 50-2022-CA-006587**

**REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff Larry Klayman (“Plaintiff”) pursuant to Florida Rules of Civil Procedure 1.350, hereby requests that Defendant PGA TOUR (“Defendant PGA”) produce to the undersigned within thirty (30) days from the date hereof, the following items on the grounds that the items requested contain or constitute material and relevant evidence to this cause and are unavailable to Plaintiff, and without which Plaintiff cannot adequately and properly prepare for this case.

**DEFINITIONS**

1.1. As used herein, “you” or “your” shall mean **PGA TOUR** and/or anyone acting on your behalf.

1.2. The singular shall include the plural and vice versa; the terms “and” and “or” shall be both conjunctive and disjunctive; and the term “including” means “including without limitation.”

1.3. “Agent” shall mean: any person or entity acting at the direction of or on behalf of another.

1.4. “Person” shall mean any individual, corporation, proprietorship, partnership, trust, association or any other entity.

1.5. The words “pertain to” or “pertaining to” mean: relates to, refers to, contains, concerns, describes, embodies, mentions, constitutes, constituting, supports, corroborates, demonstrates, proves, evidences, shows, refutes, disputes, rebuts, controverts or contradicts.

1.6. As used herein, “relevant time period” shall mean from **January 1, 2020** to the present.

1.7. The word “identify” when used in reference to a document, means and includes the name and address of the custodian of the document, the location of the document, land a general description including (1) the type of document (i.e. correspondence, memorandum, facsimile etc.; (2) the general subject matter of the document; (3) the date of the document; (4) the author of the document; (5) the addressee of the document; and (6) the relationship of the author and addressee to each other.

1.8. The terms “document” or “documents” shall mean any and all information in tangible form and shall include, without limiting the generality of the foregoing, all letters, telegrams, telexes, teletypes, correspondences, telephone billing records, e-mails, contracts, drafts, agreements, notes to file, reports, memoranda, mechanical or electronic recordings or transcripts of such recordings, blueprints, flow sheets, flow charts, calendar or diary entries, memoranda or telephone or personal conversations, text messages, signal messages, memoranda of meetings or conferences, studies, reports, interoffice and intra-office communications, quotations, offers, inquiries, bulletins, circulars, statements, manuals, summaries, newsletters, compilations, maps, charts, graphs, propositions, articles, announcements, newspaper clippings, books, records, tables, books of account, ledgers, vouchers, canceled checks, invoices, bills, opinions, certificates, promissory notes and other evidence of indebtedness and all drafts and copies of documents as hereinabove defined by whatever means made. If multiple copies of a

document exist, each copy which is in any way not completely identical to a copy which is being produced should also be produced.

### **INSTRUCTIONS**

1.9. If you object to fully identifying a document or oral communication because of an alleged privilege, you must nevertheless provide the following information:

- a) the nature of the privilege claimed (including work product);
- b) if the privilege is being asserted in connection with a claim or defense governed by state law, the state privilege rule being invoked;
- c) the date of the document or oral communication;
- d) if a document: its type, custodian, location, and such other information sufficient to identify the document for a subpoena *duces tecum* or a document request;
- e) if an oral communication, the place where it was made, the names of the persons present while it was made, and, if not apparent, the relationship of the persons present to the declarant; and
- f) the general subject matter of the document or oral communication.

### **SPECIFIC DOCUMENTS REQUESTED**

1. Any and all documents that refer or relate to the LIV Golf Tour and any of the current and rumored future players of LIV Golf Tour, including but not limited to Phil Mickelson, Dustin Johnson, Brooks Koepka, Sergio Garcia, Patrick Reed, Henrik Stenson, Cameron Smith, Tommy Fleetwood, Hideki Matsuyama, Bubba Watson, Bryson DeChambeau, Lee Westwood, Ian Poulter, Abraham Ancer, Kevin Na, Louis Oosthuizen, Jason Kokrak, Talor Gooch, Matthew Wolff, Matt Jones, Richard Bland, Pablo Larrazabal, Shaun Norris, Sam Horsfield, Scott Vincent, Sadom Kaewkanjana, Oliver Bekker, Ryosuke Kinoshita, Hudson

Swafford, Jinichiro Kozuma, Justin Harding, Charl Schwartzel, Branden Grace, Carlos Ortiz, Laurie Canter, Hennie du Plessis, Phachara Khongwatmai, Sihwan Kim, Charles Howell III, Adrian Otaegui, JC Richie, Hideto Tanihara, Martin Kaymer, Jediah Morgan, Ratchanaon Chantanuwat, Blake Windred, Wade Ormsby, Peter Uihlein, Graeme McDowell, Ian Snyman, Travis Smyth, Viraj Madappa, Itthipat Buranatanyarat, Turk Pettit, Kevin Yuan, Oliver Fisher, Andy Ogletree, Chase Koepka, James Piot, David Puig and Eugenio Lopez-Chacarra.

2. Any and all documents, text messages, emails, or correspondence that refer or relate to NBC's Golf Channel and its broadcast of statements concerning LIV Golf Tour and its current or future players including but not limited to conversations or communications with Jon Freedman, PGA Tour VP of Broadcasting Production, Laura Neal- PGA Tour Senior Vice President, Tommy Roy- Lead Producer of NBC and Golf Channel and Skye Sellars of NBC and Golf Channel,

3. Any and all video and audio recordings and documents concerning the LIV Golf Tour and any of its players, present or future by and of PGA Tour Sirius Radio and any of its radio hosts.

4. Any and all documents which mention and/or refer or relate to the LIV Golf Tour, any of its current or future players, sports washing, blood money, 9/11 or September 11, terrorists or terrorism, Saudi Arabia, Saudi Golf League, Jamal Khashoggi, and Saudi Crown Prince Mohammed bin Salmon.

5. Any and all documents which evidence and/or refer or relate in any way to collaboration with the DP World Tour and/or Keith Pelley, Guy Kinnings, David Park, Ollie Banks; The Official World Golf Ranking (OWGR) System and any communications specifically related to LIV Golf and World Ranking Points, any communications with Billy Schroder- PGA

Tour VP of International Relations regarding status or reference of OWGR System or ranking, any correspondence with Mark Broadie regarding the OWGR System or world ranking points. . Also, specifically any communications with Ian Barker- Chairman of the OWGR Technical Committee; or any other board members on the OWGR Board, including but not limited to Jay Monahan's communications with PGA Tour Executives- Andy Pazder, Tyler Dennis, Billy Shroder and any and all of their communications with The R&A (The Royal & Ancient Governing Body), Martin Slumbers- Chief Executive, and Keith Waters; The PGA of America, Seth Waugh, Paul Levy, or any communications with anyone at OWGR or any Golf Governing Body involving the rewarding of Official World Golf Ranking Points, LIV Golf, and/or the new World Ranking system set to debut on August 14, 2022.

6. Any and all documents which evidence and/or refer or relate in any way to communications concerning the LIV Golf Tour with NBC's Golf Channel , GolfChannel.com and its hosts, analysts, and contributors including but not limited to Brandel Chamblee, Paul McGinley, Mark Rolfing, Jaime Diaz, Cara Banks, Eamon Lynch, Rex Hoggard, Damon Hack, George Savaricas, David Duval, Arron Oberholser, Will Gray, Jason Sobel, Rich Lerner, Ryan Lavner, Shane Bacon, Dan Hicks, Gary Koch, Grant Boone, Jim Gallagher, Jr., Judy Rankin, Justin Leonard, Karen Stupples, Todd Lewis, Trevor Immelman, Kay Cockerill, Kira K. Dixon, Lanny Watkins, Jim "Bones" McKay, Matt Adams, Morgan Pressel, Notah Begay, Paige MacKenzie, Paul Azinger, Nick Faldo, Peter Jacobson, Bob Papa, Curt Perks, Curt Byrum, Phil Blackmar, Steve Burkowski, Steve Sands, Terry Gannon, Whit Watson, and Tom Abbot.

7. Any and all documents generated by and/or which refer or relate to the executive and other staff of NBC's Golf Channel including but not limited to Mike McCarley (President), Will McIntosh, Tommy Roy (NBC & Golf Channel Lead Producer), Tom Knapp, Molly

Solomon, Christopher Murvin, Geoff Russell, and David Schaefer, Jay Coffin, Mercer Baggs, Randell Mell, Rex Hoggard, Ryan Lavner, Jason Crook, Will Gray, Tiger Tracker, Nick Menta, Brently Romine, Samantha Marks, and Carson Williams, and the LIV Golf Tour, Greg Norman, and any of its players, present or future, and Greg Norman.

8. Any and all documents which are or constitute communications or documents which refer or relate in any way to Keith Pelley, the DP World Tour, the PGA European Tour, The Official World Golf Ranking, The R&A, Greg Norman and the LIV Golf Tour.

9. Any and all documents which evidence and/or refer or relate in any way to collaboration with the DP World Tour and/or Keith Pelley concerning LIV Golf Tour or generally.

10. Joint venture agreements with the DP World Tour from 2017 to the present including but not limited to any contracts with Corporate Partner Golf Channel to air the Saudi International Open in 2019, 2020, and 2021 during the PGA Tour Season.

11. Contracts and broadcast agreements with NBC's Golf Channel and CBS in effect from 2017 to the present.

12. Contracts and broadcast agreements with CBS and ESPN in effect from 2017 to the present.

13. Any and all documents which evidence and/or refer or relate in any way with communications with Jim Nantz and other CBS Sports analysts and hosts concerning the LIV Golf Tour.

14. Any and all documents which evidence and/or refer or relate in any way to David Feherty and his decision to join and offer commentary for the LIV Golf Tour.

15. Any and all documents which evidence and/or refer to Charles Barkley and his

consideration of joining the LIV Golf Tour as a host and analyst.

16. Copies of 990 tax returns for 2018, 2019, 2020, 2021 and 2022.

17. Copies of PGA Tour Charities, Inc. 501 (c)-3 Tax Returns for 2018, 2019, 2020, 2021, 2022 and copies of the applications and supporting documents, as well as the letters of the Internal Revenue Service granting non-profit status.

18. PGA Tour Air Inc. Flight Manifests for 2018,2019,2020, 2021.

19. Documents which are, evidence and/or refer or relate in any way to LIV Golf Tour and publications that cover golf and in particular including but not limited to these golf and sports reporters: Doug Ferguson of Associated Press, Bob Harig- Sports Illustrated, Scott Michaux- Global Golf Post, Alan Shipnuck of FirePit Collective, Brian Wacker of Golf Digest, Joel Beall- Golf Digest, Bob Harig-ESPN, Ian O'Connor-ESPN, Eamon Lynch- Golfweek/USAToday, Neil Tappin-Golf Monthly Editor, Ewin Murray- The Guardian, Evin Priest-PGA Tour Correspondent AAP, Ryan Lavner-GolfChannel.com, Jason Sobel- Action Sports Network, Tom DiAngelo of the Palm Beach Post, PL.

20. Any and all documents which evidence and/or refer or relate in any way to communications with the golf and sports reporters in Request 19, above.

21. Copies of any documents showing insurance agreements covering potential liability.

22. Any and all documents which refer to relate to other lawsuits filed in state and/or federal court against the PGA Tour and/or its leadership such as Jay Monahan, Andy Pazner, Tyler Dennis.

23. Any and all documents evidencing and which refer or relate in any way with communications with the following major golf tournaments, concerning LIV Golf Tour, Greg

Norman and any of the current or future players of LIV Golf Tour, including but not limited to The Masters, U.S. Open, British Open, the PGA, the Players Championship and the FedEx Cup.

24. Any and all documents evidencing communications with the Player Advisory Council (PAC), any Player Advisory Members or Directors , at or during any Mandatory Player Meetings, as well as communications with Davis Love III, Fred Couples, Rory McIlroy, Billy Horschel, Justin Thomas and any other player on the PGA Tour concerning LIV Golf and/or the current and future players of the LIV Golf Tour.

25. Any and all documents evidencing or which refer or relate to suspensions or fines levied or to be levied on PGA Tour players and/or PGA Tour Players who have resigned from the PGA Tour over their joining the LIV Golf Tour.

26. Any and all documents evidencing or which refer and/or relate to suspensions or fines levied or to be levied to Tour Players for playing in an event not sanctioned by the PGA Tour; or any evidence of no levies or sanctions against PGA Tour players who play in an opposing event (For example, a PGA Tour player playing in an Australian Tour Event or event not sanctioned by the PGA or DP World Tour which is hosted during a PGA Tour Event).

27. Any and all documents which refer or relate to lobbyists hired to lobby federal or state government concerning LIV Golf Tour and the amounts of compensation from 2019 to the present, including but not limited to DLA Piper LLC.

28. Any and all documents which refer or relate to communications with federal or state politicians including but not limited to congressmen and senators concerning the LIV Golf Tour.

29. Any and all documents which refer or relate to discussed or planned future actions against or concerning PGA Tour players who have joined or in the future join the LIV Golf Tour.



30. Any and all documents which evidence and/or refer or relate in any way to communications with Martin Slumbers of the Royal and Ancient Golf Club of St. Andrews concerning LIV Golf Tour and any of its' current or future players and Greg Norman.

31. Any and all documents which evidence and/or refer or relate in any way to Fred Ridley, Chairman of Augusta National Golf Club, Buzzy Johnson- OWGR Board Member for Augusta National and any other official and/or active member of Augusta National Golf Club concerning LIV Golf Tour and past winners of the Masters Golf Tournament, including but not limited to, Phil Mickelson, Charl Schwartzel, Sergio Garcia, Patrick Reed, Dustin Johnson, and Hideki Matsuyama.

32. Any and all documents which evidence and/or refer or relate in any way to Fred Ridley, Chairman of Augusta National Golf Club, and any other official of Augusta National Golf Club concerning the LIV Golf Tour.

33. Any and all documents which refer or relate to a reported investigation by the Antitrust Division of the U.S. Department of Justice concerning actions by the PGA Tour and/or its leadership with regard to the LIV Golf Tour.

34. Any and all documents which evidence and/or refer or relate in way with Saudi and Middle Eastern money and the PGA Tour and/or DP World Tour including but not limited to sponsor such as Aramco.

35. Any and all documents which evidence and/or refer or relate in any way to sponsors of the PGA Tour and Saudi Arabia in terms of Saudi ownership or investment in whole or in part.

36. Any and all documents which evidence and/or refer and/or relate to Official World Rank Points and current and future LIV Golf Tour players.

37. Any and all documents which evidence and/or refer or relate to denying Official World Tour Rank Points to LIV Golf Tour players, current and future.

38. Any and all documents of Official Golf Tour Ranking, which took over the ranking system from IMG, whose seven members include the PGA of America, the International Federation of PGA Tours, the DP World Tour the USGA, the PGA Tour, Augusta National, the R&A and the PGA European Tour, concerning persons who sit of the Board and may be alleged and/or are alleged to have conflicts of interest, and who set policy, regulations and issue directives over whether or not LIV Golf Tour players, present and future, qualify or will qualify for World Ranking Points.

39. Any and all documents which evidence and/or refer or relate in any way to the application to the application of the LIV Golf Tour for inclusion in its ranking system.

40. Any and all documents which refer to compensation paid by the PGA Tour and/or any of its agents and affiliates, including but not limited to sponsors, whether monetary or non-monetary, to Jay Monahan.

41. Any and all documents evidencing and/or which refer or relate in any way to eligibility of LIV Golf Tour players, present or future, to play in the qualifying round tournaments for and in the FedEx Cup for 2022, and beyond.

42. Any and all communications which evidence and/or refer or relate in any way to Tiger Woods and/or statements by Tiger Woods, David Love III, Fred Couples, Justin Thomas, and Rory McIlroy, concerning the LIV Golf Tour, Greg Norman and/or any of its players, present and/or future.

43. Any and all documents which evidence and/or refer or relate to the regulations, policies and directives of the PGA Tour as they concern or affect the golfing members and

former members of the PGA Tour who have joined the LIV Golf Tour from 2019 to the present.

44. Any and all communications with sponsors of LIV Golf Tour players, present and future, over their sponsorships with these LIV Golf Tour players including but not limited to Royal Bank of Canada (RBC), Bridgestone, Rocket Mortgage, Mastercard, MGM, AT&T, Titleist, Callaway, PXG, Mizuno, Taylor-Made, Cobra, Quicken Loans, Rolex, Acushnet Company, Vidanta Golf, TV Azteca, Akron, Unifin, Puma, Adidas, Nike, American Express, and others, prior or after PGA Tour players joined the LIV Golf Tour.

45. Any and all communications and/or documents which refer or relate in any way with Ross Berlin and/or Tyler Dennis, and/or Paul G. Johnson concerning the LIV Golf Tour and/or any of its players, present or future.

46. Any and all documents which refer or relate to the pricing of tickets to PGA Tour events and tournaments in competition with the LIV Golf Tour.

47. Studies and any and all other documents that refer or relate to the competitive effects on competition from the LIV Golf Tour the PGA Tour and/or DP World Tour.

48. Any and all documents which refer or relate to whether, as stated publicly by Jay Monahan, the LIV Golf Tour is an “existential threat” to the PGA Tour and professional golf in general.

49. Any and all documents which refer or relate to a desire and/or intent to end the LIV Golf Tour and/or punish, sanction or fine former and current PGA Tour and DP World players on the LIV Golf Tour.

50. Any and all documents which evidence and/or relate to Donald Trump, his golf clubs such as at Bedminster, New Jersey and Doral, Florida, and the LIV Golf Tour and its players, present and future, as well as President Trump’s financial and expressed written and

verbal support for the LIV Golf Tour and its players, present and future.

51. Any and all documents which evidence and/or refer or relate to political campaign hard and/or soft money individual and corporate contributions by the PGA Tour and/or its leadership of the PGA Tour, including but not limited to Jay Monahan, to federal and state congressmen and congresswomen, and presidential candidates such as Joe Biden, and their campaign committees.

52. Any and all documents that evidence and/or refer or relate in any way to the retention and/or enlistment of private detectives and other persons and entities to investigate Greg Norman and players, present and future, on the LIV Golf Tour, and monies paid by the PGA Tour in this regard.

53. Any and all documents which evidence and/or refer and relate to the rationale, reasons and underlying pretext or considerations why Jay Monahan, Andy Pazner and Tyler Dennis of the PGA Tour all signed up to use the encrypted communication internet carrier Signal on the same day, that is April 12, 2022.

54. Any and all documents which evidence and/or refer and relate to any concern or fear that the telephone and text messages of Jay Monahan, Andy Pazner and Tyler Dennis are, were, or could be under surveillance by state or federal governmental investigative and other agencies such as the FBI on behalf of the Antitrust Division of the U.S. Department of Justice and/or the Federal Trade Commission, or the Internal Revenue Service by way of just three examples, or subject to hacking and surveillance by adverse interests in general.

DATED on August 8, 2022

/s/ Larry Klayman

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**CERTIFICATE OF SERVICE**

I, Larry Klayman, hereby certify that on this day, August 8, 2022 a copy of the foregoing was filed via this Court's e-filing system and served upon all parties and/or counsel of record through Notices of Electronic Filing and via email.

*/s/ Larry Klayman*  
Larry Klayman