

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

LARRY KLAYMAN,

AND MEMBERS OF THE PUTATIVE CLASS

Plaintiffs

v.

PGA TOUR, et. al

Defendants.

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

**PLAINTIFF’S SECOND REQUEST FOR PRODUCTION OF DOCUMENTS**

Plaintiff Larry Klayman (“Plaintiff”) pursuant to Florida Rules of Civil Procedure 1.350, hereby requests that Defendant the PGA Tour 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 which refer or relate to the PGA Tour players meeting with Tiger Woods that occurred on or about August 16, 2022, including but not limited to notes, text messages, emails, letters, audio and video recordings of the meeting, and other recordations of what was discussed and/or what occurred at the meeting.

2. Any and all documents which refer or relate in any way to the Official Golf Tour Ranking aka OWTR and its awarding or lack thereof of world point golf ranking points, the distribution of those points, as was as the effects on other tours that are affiliated and use the

OWGR system. These documents would also include but not be limited to studies concerning the efficacy and fairness of the world point golf ranking system.

3. Any and all documents that refer and/or relate in any, and correspondence, with regard to Mark Brodie, Richard J. Rendleman, Jr, the OWGR and/or other founding members of the OWGR regarding past and any new OWGR points systems with any official, employee, independent contractor, or other person affiliated in any way with the PGA Tour and/or DP World Tours.

4. Any and all documents, including communications, regarding statistical techniques that were run on any specific and/or grouping of PGA Tour and/or DP World Tour players that any new system would impact, and how a statistical evaluation of each such player and/or groups of players was done.

5. Any documents, including communications, that refer or relate in any way to LIV Golf, the LIV Golf Tour, it's players with regard to world ranking points and eligibility for LIV players to qualify to play in the Majors and World Golf Championships. These documents would also include but not be limited to studies and analyses concerning the efficacy and fairness of the OWGR system produced and/or sanctioned by the PGA Tour, DP World Tour, Mark Broadie, Richard J. Rendleman, OWGR and/or academic institutions, colleges and universities which were contacted and/or contracted to perform such studies and analyses.

6. Any documents that refer or relate to the OWGR ranking systems, past, present and future, and Ian Barker, Chairman of the Technical Committee of the OWGR and/or Peter Dawson, Chairman of the Board of the OWGR.

7. Any documents that refer and/or relate in any way to predicted outcomes and benefits to the PGA Tour and/or the DP World Tour, with regard to any newly derived system

and what it would do and how it may or may not effect any particular player or players, and/or the impact it would have on other professional golf tours.

8. Any documents, including communications, from or to the PGA Tour and/or DP World Tour, inquiring into and/or discussing anything about any PGA and/or DP World Tour player with reference to the OWGR system, and how it may impact players on tour, including but not limited to communications to and from Mark Broadie, Billy Schroder, Andy Pazner, Tyler Dennis, Ty Votaw, Laura Neal, Kirsten Burgess, Richard J. Rendleman and any board member and/or staff on or at the OWGR.

9. Any documents which evidence and/or refer or relate to advocating changes to the OWGR system, and any communications with Mark Broadie and/or the PGA Tour and/or DP World Tour which involve specific players with regard to the impact of the OWGR's present and/or future OWGR systems, models run on specific players, communications with any and all founding members of the OWGR, the governing bodies in golf, the OWGR and other professional golf tours.

10. Any and all audio recordings of the broadcasts of PGA Tour Radio on Sirius XM concerning Liv Golf, LIV Golf players, including but not limited to Patrick Reed, his wife Justine Reed and their legal counsel Larry Klayman and the recent defamation lawsuit which they filed against Brandel Chamblee and Golf Channel.

11. Any and all communications and other documents related to LIV Golf and it's players, the recent defamation suit brought by Patrick Reed and any communications sent to PGA Tour staff, or anyone else in the golfing media, including but not limited to independent contractors such as public relations agencies, regarding the following subjects:

- a. Documents that refer or relate in any way to communications to and from NBC's Golf Channel and/or Brandel Chamblee, or any person or persons employed by NBC's Golf Channel.
- b. Documents which evidence, including any communications, to and/or from any executive staff of the PGA Tour and/or DP World Tour, or rank and file staff members and/or independent contractors and consultants, including public relations firms, and corporate sponsors, club manufacturers, or other major sponsors of the PGA Tour and/or DP World Tour, including but not limited to Grant Thornton, AT&T, FedEx, regarding the LIV, the LIV Golf Tour and any of their players.
- c. Documents which evidence, including any communications, from and/or to Jay Monahan, Andy Pazner and any other PGA Tour and/or DP World Tour staff member and/or independent contractor and/or consultant with regard to contacting any potential course, public or private, regarding the hosting of a LIV Golf event.
- d. Any documents which evidence, including any communications, by the PGA Tour and/or DP World Tour with regard to Trump National-Bedminster and/or Donald Trump, including but not limited to documents evidencing and/or that refer and/or relate to communications to and/or from and/or concerning any member of the PGA of America.

12. Any and all audio recordings and transcripts of broadcasts of PGA Tour Radio on Sirius XM that concern or relate in any way to LIV Golf and its players.

13. Any and all documents from 2017 to the present, which refer and/or relate in any way to PGA Tour Players Advisory Committee (PAC) meetings, the minutes of these meetings,

any topics, current events, and outcome of those meetings, in addition to the one held on about August 16, 2022, with Tiger Woods, where LIV Golf and/or its players were discussed.

14. Any and all documents which evidence communications to or from Brandel Chamblee and/or persons at NBC's Golf Channel including executive producers, television golf hosts and analysts, videographers, staff and independent contractors, including but not limited to public relations firms, that refer or relate to the lawsuit brought by Patrick Reed for defamation against Brandel Chamblee and NBC's Golf Channel.

15. Any and all documents, including communications with any media which evidence and/or refer or relate to Brandel Chamblee and/or persons at NBC's Golf Channel, which refer and/or relate in any way to the defamation lawsuit brought by Patrick Reed against Brandel Chamblee and Golf Channel.

DATED on August 19, 2022

/s/ Larry Klayman

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**CERTIFICATE OF SERVICE**

I, Larry Klayman, hereby certify that on this day, August 19, 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