

IN THE CIRCUIT COURT OF 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**

**SUBPOENA FOR DEPOSITION DUCES TECUM**

THE STATE OF FLORIDA:

TO: Davis Milton Love III  
100 Brunswick Ave  
Saint Simons Island, GA, 31522

YOU ARE COMMANDED to appear before a person authorized by law to take  
depositions at:

Gilbert & Jones  
1607 Norwich Street  
Brunswick, GA 31520

for the taking of your deposition in this action on October 11, 2022 at 10:00 a.m. EST for your  
deposition in this matter and to bring with you the following documents:

(1) *See Attachment*

The oral examination will occur in front a videographer and will continue from day to  
day until completed. This deposition is being taken for the purposes of discovery, for use at trial,  
or for such other purposes as are permitted under applicable Florida Rules of Civil Procedure. If  
you fail to appear, you may be in contempt of court. You are subpoenaed to appear by the  
following attorney, and unless excused from this subpoena by this attorney or the court, you shall

respond to this subpoena as directed.

DATED on August 31, 2022

/s/ Larry Klayman  
Larry Klayman, Esq.  
Florida Bar No. 246220  
7050 W. Palmetto Park Rd. #15-287  
Boca Raton, FL, 33433  
[leklayman@gmail.com](mailto:leklayman@gmail.com)

*Pro se and on behalf of the putative class*

CC: Lawrence Silverman, Esq., [lawrence.silverman@sidley.com](mailto:lawrence.silverman@sidley.com), counsel for Defendants PGA Tour and Joseph William Monahan IV

**[ATTACHMENT]**

**DEFINITIONS**

1.1. As used herein, “you” or “your” shall mean **DAVIS MILTON LOVE III** 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, and 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, audio, video, 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 competition between the PGA Tour, DP World Tour, and LIV Golf and LIV Golf's players such as Patrick Reed, Dustin Jonhson, Bryson DeChambeau, Cameron Smith and others who have joined LIV Golf.

2. Any and all communications concerning and/or which refer or relate to LIV Golf and/or its players with Tiger Woods, Rory McIlroy, Jay Monahan, Keith Pelley, the OWGR, and hosts and analysts at NBC's Golf Channel including but not limited to Brandel Chamblee.

3. Any and all documents that refer or relate to LIV Golf and/or its players.