

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF FLORIDA

CASE NO.: 8:24-cv-00008-TPB-SPF

ERIC COOMER,

Defendant,

v.

PATRICK BYRNE, STEVE  
LUCESCU, and THE  
AMERICA PROJECT INC.,

Defendants.

---

**ADDENDUM TO PATRICK BYRNE'S RESPONSE  
TO PLAINTIFF'S TIME SENSITIVE  
MOTION FOR PROTECTIVE ORDER**

The Defendant, Patrick Byrne, by and through his undersigned counsel, hereby files this his Addendum To Patrick Byrne's Response To Plaintiff's Time Sensitive Motion For Protective Order. [DE 274].

Just prior to midnight on January 22, 2026, the Plaintiff, Eric Coomer, provided responses to Patrick Byrne's Request for Admissions with additional requested discovery.

**Admissions by the Plaintiff, Eric Coomer:**

The Plaintiff's Response to the Defendant's Request for Admissions, are attached hereto and marked as Exhibit "A," provided the following admissions, which are pertinent to the Plaintiff's Time Sensitive Motion for Protective Order:

1. As part of his job responsibilities and marketing activities, Eric Coomer previously met with individuals of foreign countries to discuss Dominion equipment. See Admission No. 32.

2. Eric Coomer discussed vote adjudication software with internal Dominion employees he understood to be from foreign countries. See Admission No. 33.

3. Eric Coomer discussed election system code with internal Dominion employees he understood to be from foreign countries. See Admission No. 34.

4. Eric discussed programming at a code-based level with internal Dominion employees he understood to be from foreign countries. See Admission No. 35.

5. Serbian employees had the ability to connect to Dominion equipment in Dominions Denver office to troubleshoot technical issues, clarifying that this was distinct from remote access to Dominion equipment fielded in customer jurisdictions. See Admission No. 44.

### **Relevance to the Defendants Defense**

These admissions are directly relevant to Dr. Byrne's defense of Truth.

Dr. Byrne intends to present evidence to prove that Dr. Coomer conspired with other Dominion employees to rig the 2020 Presidential Election. The admissions demonstrate Dr. Coomer's significant role in the operation, oversight, and discussions regarding Dominions voting systems, including interactions with

foreign individuals and employees, which are central to the allegations in this case.

**Impact on Plaintiffs Motion for Protective Order:**

The admissions provided herein further support Dr. Byrne's position that Dr. Coomer's deposition should not be limited in scope. The information sought in Dr. Coomer's deposition is directly related to the claims and defenses in this case, including Dr. Coomer's role in the development, implementation, and oversight of Dominions voting systems, as well as his communications with individuals involved in the election process.

**Conclusion**

The Defendant, Patrick Byrne, respectfully requests that the Court consider this supplement in ruling on the Plaintiffs Time Sensitive Motion for Protective Order and deny the motion in its entirety.

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on January 23, 2026, the foregoing document, was electronically filed with the Clerk of the Court using CM/ECF to serve on all counsel of record.

*/s/ David L. Perry II*  
Peter Ticktin, Esquire  
Florida Bar No. 887935  
David L. Perry II, Esquire  
Florida Bar No. 1045902  
[Serv512@LegalBrains.com](mailto:Serv512@LegalBrains.com)  
[Serv514@LegalBrains.com](mailto:Serv514@LegalBrains.com)  
[Serv600@LegalBrains.com](mailto:Serv600@LegalBrains.com)

**THE TICKTIN LAW GROUP**  
270 SW Natura Avenue  
Deerfield Beach, Florida 33441  
Telephone: (561) 232-2222  
*Attorneys for Patrick Byrne*