

DATE 10/16/17 TIME: 9:30am 1.02

LOUISVILLE METRO COUNCIL

COMMONWEALTH OF KENTUCKY  
LOUISVILLE METRO GOVERNMENT  
JEFFERSON COUNTYIN THE MATTER OF REMOVAL PROCEEDINGS AGAINST  
DISTRICT 21 COUNCILMAN DAN JOHNSON**RESPONDENT'S MOTION TO**  
**INTRODUCE PHOTOGRAPHIC EVIDENCE**  
**(RESPONDENT'S MOTION NO. 5)**

Comes now the Respondent herein, Hon. Daniel Johnson, District 21 Louisville Metro Councilman, by counsel, and respectfully moves the Louisville Metro Council Court to enter the following Order. The undersigned hereby certifies that copies hereof were mailed and emailed to the following individuals on October 16, 2017:

Hon. H. Stephen Ott  
Clerk, Louisville Metro Council  
City Hall, 601 West Jefferson Street  
Louisville, Kentucky 40202  
[Stephen.Ott@louisvilleky.gov](mailto:Stephen.Ott@louisvilleky.gov)

Hon. Mike O'Connell  
Jefferson County Attorney  
Jefferson Hall of Justice  
600 West Jefferson Street  
Louisville, Kentucky 40202  
[Mike.O'Connell@louisvilleky.gov](mailto:Mike.O'Connell@louisvilleky.gov)

Hon. Deborah K. Kent  
Deborah Kent Law Office  
Suite 211  
120 Sears Avenue  
Louisville, Kentucky 40207-5072  
[dkent@twc.com](mailto:dkent@twc.com)

Respectfully submitted,



Thomas A. McAdam, III,  
Attorney for Respondent  
2950 Breckenridge Lane, Suite 9  
Louisville, Kentucky 40220  
(502) 584-7255 FAX: 585-2025  
[thomas@mcadam.com](mailto:thomas@mcadam.com) KBA: 45200

1 LOUISVILLE METRO COUNCIL

COMMONWEALTH OF KENTUCKY  
LOUISVILLE METRO GOVERNMENT  
JEFFERSON COUNTY

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4 IN THE MATTER OF REMOVAL PROCEEDINGS AGAINST  
5 DISTRICT 21 COUNCILMAN DAN JOHNSON

6 **RESPONDENT'S MOTION FOR**  
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8 **INTRODUCTION OF PHOTOGRAPHIC EVIDENCE**  
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10 **(RESPONDENT'S MOTION NO. 5)**

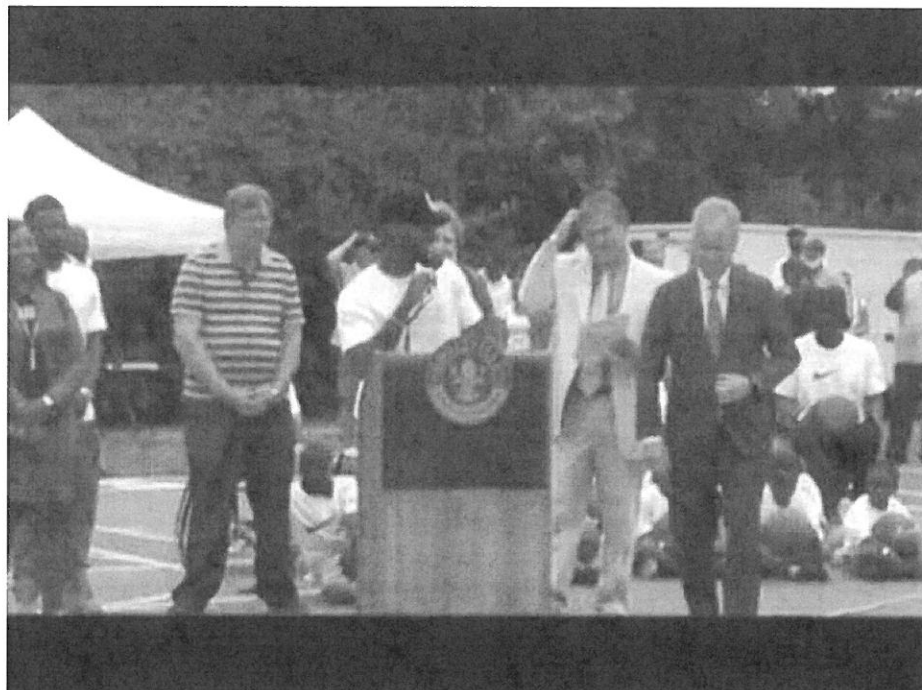
11 1. Comes now the Respondent herein, Hon. Daniel Johnson, District 21 Louisville  
12 Metro Councilman, by counsel, and respectfully moves the Louisville Metro Council Court  
13 to enter the following photographic evidence at the Removal Hearing scheduled herein.  
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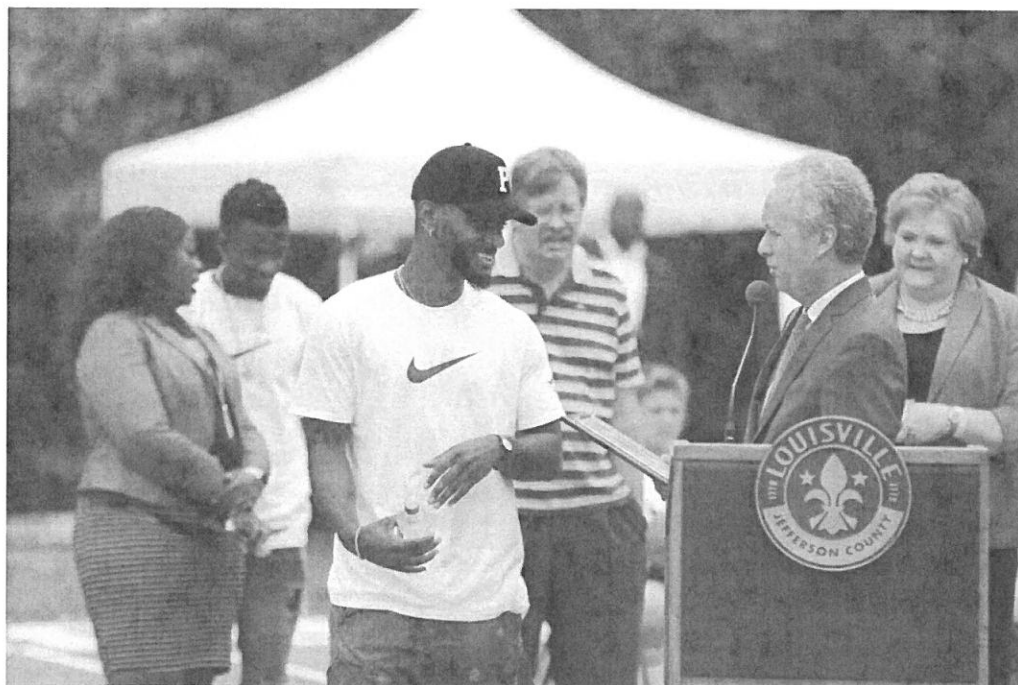
28 **RESPONDENT'S EXHIBIT NO. 1**



**RESPONDENT'S EXHIBIT NO. 2**



**RESPONDENT'S EXHIBIT NO. 3**



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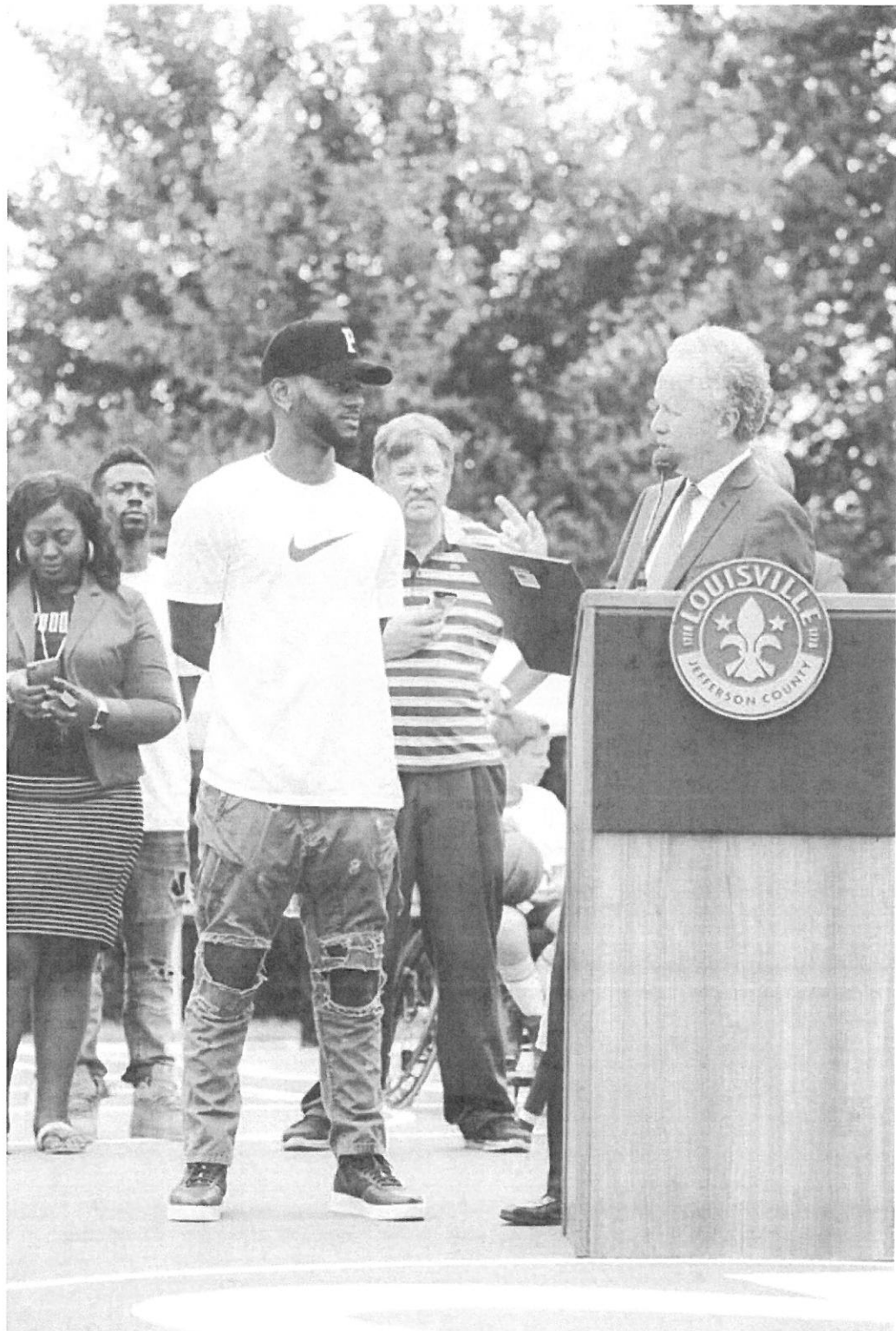
**RESPONDENT'S EXHIBIT NO. 4**



Access Louisville: New Courts at Wyandotte Park @louisvillemayor @loumetroparks @BrysonTiller

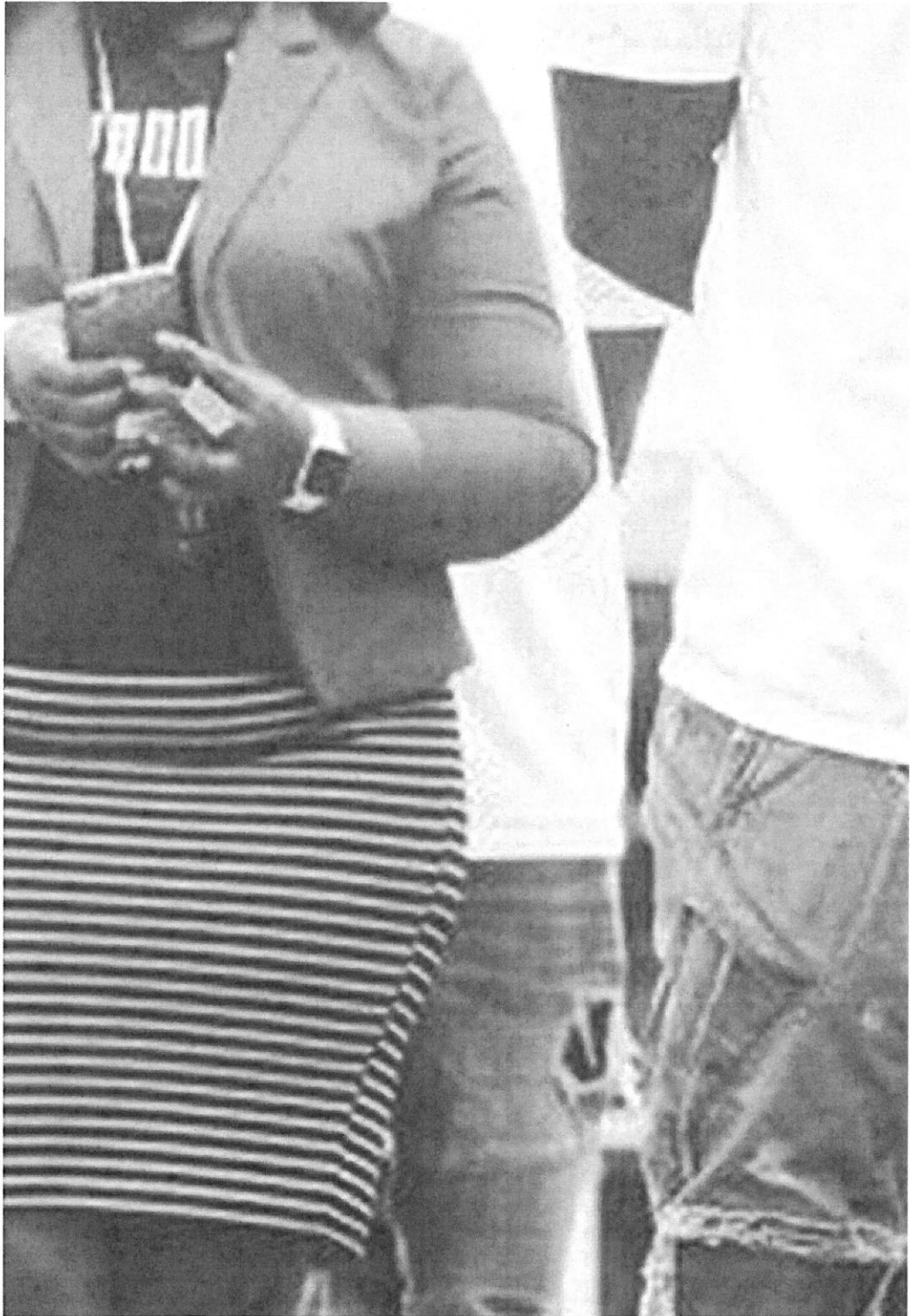
**RESPONDENT'S EXHIBIT NO. 5**





**RESPONDENT'S EXHIBIT NO. 6**

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**RESPONDENT'S EXHIBIT NO. 7**

1           2. Additionally, Respondent intends to introduce into evidence any and all  
2 photographs in the possession of Louisville Metro employee Elizabeth Hoffman, who was  
3 present at Wyandotte Park on June 7, 2017, and took a number of photographs at the  
4 event being held at that location. A *Supoena Duces Tecum* for Ms. Hoffman will be  
5 requested by the Respondent.  
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7           3. Respondent will also introduce any and all photographic evidence proffered by  
8 the Petitioners herein, and any and all photographic Respondent discovers subsequent to  
9 the filing of this Motion.  
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24 Respectfully submitted,

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26 Thomas A. McAdam, III,  
27 Attorney for Respondent  
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