

Exhibit 1

Cockrum v. Donald J. Trump for President, Inc.

communications, internal memoranda, reports, ledgers, journals, minutes, personnel files, and any other electronic or computerized data compilations. A draft or non-identical copy is a separate document within the meaning of this term.

2. As used herein, “communication” means the transmittal of information expressed by any means, including, but not limited to, e-mails, text messages, letters, cards, memoranda, voicemails and other conversations between two or more people.

3. As used herein, “The Trump Campaign” means Defendant Donald J. Trump for President, Inc., and any past and present parents, subsidiaries, affiliates, predecessors, successors, employees, independent contractors, officers, agents, advisors, vendors, accountants, and all other persons or entities acting on its behalf or under its direct or indirect control, whether paid or unpaid.

4. As used herein, the terms “relate to,” “relating to,” “regard,” or “regarding” mean refers to, contains, embodies, mentions, supports, corroborates, bolsters, demonstrates, proves, evidences, shows, refutes, negatives, diminishes, disputes, rebuts, controverts, contradicts, describes, reflects, analyzes, interprets, or summarizes.

5. As used herein, the term “including” means “including but not limited to.”

6. As used herein, the term “DNC” refers to the Democratic National Committee.

7. As used here, the term “2016 DNC Hack” refers to the unauthorized access to and theft of e-mails and other documents from the computer networks of the DNC effectuated by conspirators including Russian intelligence, as described in the July 13, 2018 Criminal Indictment in *United States v. Netysko et al.*, Case No. 18-CR-00215-ABJ (D.D.C), and in the Intelligence Community Assessment report “Assessing Russian Activities and Intentions in Recent U.S. Elections” (January 6, 2017) at pp. 2-3.

8. As used herein, the term “Russia” refers to the Russian Federation and the Government of the Russian Federation and its officers, employees, and agents.

9. As used herein, the term “Russian Intermediary” refers to individuals acting as a link or go-between any individual and Russia. “Intermediary” is used consistent with its plain English meaning.

10. As used herein, the term “WikiLeaks” refers to wikileaks.org and any agents thereof.

11. The following rules of construction apply to all discovery requests:

a. As used herein, the terms “all” and “each” shall be construed as all and each.

b. As used herein, the terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of its scope.

c. As used herein, the use of the singular form of any word includes the plural and vice versa.

12. “ESI” or “Electronically Stored Information” means information that is stored in electronic media, regardless of the media or whether it is in the original format in which it is created, and that is retrievable in perceivable form and includes metadata, system data, deleted data, and fragmented data.

INSTRUCTIONS

1. With respect to each document request, you are to produce all documents in your possession, custody, or control that are known to you or that you can locate or discover through reasonably diligent efforts, including documents in the possession, custody, or control of you,

your present and former agents, employees, investigators, independent contractors, attorneys, or other persons acting on your behalf.

2. In accordance with Fed. R. Civ. P. 34(b), the documents requested herein must be produced as they are kept in the usual course of business or must be organized and labeled to correspond with the specific paragraphs of this request for production.

3. If you cannot respond to any part of any of the following documents requests in full, please respond to the extent possible, specifying the reason or reasons for your inability to respond to the remainder of the request.

4. If any document is known to have existed but no longer exists, has been destroyed, or is otherwise unavailable, any Defendant that would otherwise produce the document must identify the document, the reason for its destruction (if applicable), the name of each person known or reasonably believed by the Defendant(s) to have present possession, custody, or control of the original and any copy thereof (if applicable), and a description of the disposition of each copy of the document or ESI.

5. In accordance with Fed. R. Civ. P. 34(b) and L.R. 26, if you object to a particular request for production, but the objection does not apply to all documents within the scope of that request, you must produce all requested documents that are outside the scope of the objection.

6. If any claim of privilege or work product is asserted as to any requested document (or any portion thereof), you are requested to furnish a schedule or "privilege log" identifying for each document: (a) the nature of the privilege; (b) the type of the document (e.g. letter, memorandum, etc.); (c) the general subject matter of the document; (d) the date of the document; (e) such other information as is sufficient to identify the document for a subpoena duces tecum,

including, where appropriate, the author of the document, the addressee of the document, and, where not apparent, the relationship of the author and addressee to each other.

7. If no documents or ESI responsive to a request exist, please state that no responsive documents exist.

8. ESI must be produced in native format, with all non-privileged associated metadata intact. E-mails must be processed preserving original time information. Image documents must include a link to the associated native file. Nonprintable or nonconvertible files (e.g., video files and sound files) must be identified by an imaged placeholder explaining why the file could not be printed or converted and including a link to the nonprintable or nonconvertible file.

9. These requests are continuing in nature and require supplemental response and production.

DOCUMENTS REQUESTED

1. Documents sufficient to identify all of The Trump Campaign's directors, officers, and employees from 2015 to the present, by name and title and dates of employment.

2. Any organizational charts or other documents containing, depicting or referencing the organizational structure of The Trump Campaign from 2015 to the present, including but not limited to any board of directors and executive, managerial and administrative positions.

3. Documents sufficient to identify all advisors and consultants, whether paid or unpaid, to The Trump Campaign in 2015 and 2016 by name and title and dates of service to the Campaign.

4. All documents relating to Plaintiff Roy Cockrum.

5. All documents relating to Plaintiff Scott Comer.

6. All documents relating to Plaintiff Eric Schoenberg.
7. All documents relating to the 2016 DNC Hack.
8. All documents relating to the involvement of Russia or Russian Intermediaries (including but not limited to Russian intelligence, “Fancy Bear,” “Cozy Bear,” or “Guccifer 2.0”) in the hacking and theft of e-mails and other documents in the 2016 DNC Hack.
9. All documents relating to the publication or any other use (including but not limited to the release, amplification, promotion, or distribution) of e-mails or other documents, or the contents thereof, taken from the DNC in the 2016 DNC Hack, including but not limited to the publication of e-mails or other documents by WikiLeaks.
10. All communications between The Trump Campaign and any Russian national regarding the DNC, the 2016 DNC Hack, or any e-mails or other materials taken from the DNC or the contents thereof.
11. All documents discussing or relating to any communications between The Trump Campaign and any Russian national regarding the DNC, the 2016 DNC Hack, or any e-mails or other materials taken from the DNC or the contents thereof.
12. All communications between The Trump Campaign and any Russian Intermediary regarding the DNC, the 2016 DNC Hack, or any e-mails or other materials taken from the DNC or the contents thereof.
13. All documents discussing or relating to any communications between The Trump Campaign and any Russian Intermediary regarding the DNC, the 2016 DNC Hack, or any e-mails or other materials taken from the DNC or the contents thereof.

14. All communications between The Trump Campaign and any Russian national regarding WikiLeaks, Julian Assange, or any other agent of or individual affiliated with Wikileaks.

15. All documents discussing or relating to any communications between The Trump Campaign and any Russian national regarding WikiLeaks, Julian Assange, or any other agent of or individual affiliated with WikiLeaks.

16. All communications between The Trump Campaign and any Russian Intermediary regarding WikiLeaks, Julian Assange, or any other agent of or individual affiliated with WikiLeaks.

17. All documents discussing or relating to any communications between The Trump Campaign and any Russian Intermediary regarding WikiLeaks, Julian Assange, or any other agent of or individual affiliated with WikiLeaks.

18. All communications between The Trump Campaign and WikiLeaks during 2016, including direct and indirect communications with Julian Assange and any other agent of or individual affiliated with WikiLeaks.

19. All documents discussing or relating to any communications between The Trump Campaign and WikiLeaks during 2016, including direct and indirect communications with Julian Assange and any other agent of or individual affiliated with WikiLeaks.

20. All documents reflecting, referring, or relating to any communication between Roger Stone and any individual regarding the 2016 DNC Hack, or the contents of any e-mails or documents taken therein.

21. All documents reflecting, referring, or relating to any communication between Roger Stone and individual(s) known as "Guccifer 2.0," "Fancy Bear," "Cozy Bear."

22. All documents reflecting, referring, or relating to any communication between Roger Stone and WikiLeaks, Julian Assange, or any other agent of or individual affiliated with WikiLeaks.

23. All communications between The Trump Campaign and Jerome Corsi regarding WikiLeaks, Julian Assange or any other agent of or individual affiliated with WikiLeaks.

24. All documents discussing or relating to any communications between communications between The Trump Campaign and Jerome Corsi regarding WikiLeaks, Julian Assange, or any other agent of or individual affiliated with WikiLeaks.

25. All documents reflecting, referring, or relating to any communication with Joseph Mifsud in 2016.

26. All documents reflecting, referring, or relating to any communication with Ronald Goldstone in 2016.

27. All documents reflecting, referring, or relating to any communication with Natalia Veselnitskaya in 2016.

28. All documents reflecting, referring, or relating to any communication with Aras Agalarov in 2016.

29. All documents reflecting, referring, or relating to any communication with Ivan Timofeyev in 2016.

30. All documents reflecting, referring, or relating to any communication with Irakly “Ike” Kaveladze in 2016.

31. All documents reflecting, referring, or relating to any communication with Igor Divyekin in 2016.

32. All calendars or other documents containing information regarding the date, time, or place of meetings (whether in person, telephonic, or electronic via Skype or another other electronic medium) or communications between The Trump Campaign and any Russian national in 2016.

33. All calendars or other documents containing information regarding the date, time, or place of meetings (whether in person, telephonic, or electronic via Skype or another other electronic medium) or communications between The Trump Campaign and any Russian Intermediary in 2016.

34. All documents relating to any meeting between The Trump Campaign and any Russian national in 2016.

35. All documents relating to the June 9, 2016 meeting at Trump Tower between The Trump Campaign and Russian nationals including Natalia Veselnitskaya, including any calendar entries, e-mails, or notes.

36. All documents relating to the meeting on or about March 31, 2016 in Washington, D.C. attended by The Trump Campaign's foreign policy advisors, including but not limited to George Papadopoulos, including any calendar entries, e-mails, or notes.

37. All documents from 2016 discussing or relating to any assistance that The Trump Campaign had provided, would provide, or could provide to Russia, including but not limited to influencing or attempting to influence any party platform.

Dated: January 8, 2019

By: /s/ Danielle Leonard
Danielle Leonard
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that, pursuant to the Federal Rules of Civil Procedure and Local Rules of the Eastern District Court of Virginia and the parties' agreement to accept electronic service, this document,

PLAINTIFFS' FIRST SET OF REQUESTS FOR PRODUCTION OF DOCUMENTS TO
DEFENDANT DONALD J. TRUMP FOR PRESIDENT, INC.

was served on the parties, through their attorneys of record, on January 8, 2019.

Dated: January 8, 2019.

/s/ Danielle Leonard

Danielle Leonard