

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ALABAMA
MIDDLE DIVISION**

GARY WAYNE WRIGHT, II)	
)	
Plaintiff)	
)	
v.)	Civil Case: 4:22-CV-615-RDP
)	
MARSHALL COUNTY, ALABAMA, et al.)	Claim of Unconstitutionality
)	
Defendants)	

PLAINTIFF’S RULE 26(a)(1) DISCLOSURES

COMES NOW the pro se Plaintiff, Gary Wayne Wright II (“Wright”) proceeding in forma pauperis, and against the Defendants, Marshall County, Alabama (“Marshall County”), their employees, agents, and successors in office, and in support therefor states as follows:

PARTIES

1. The Plaintiff hereby submits the following disclosures in accordance with Fed. R. Civ. P. 26 (“Rule 26”):

2. **Rule 26(a)(1)(A)(i)** – The name and contact information of each individual likely to have discoverable information – along with the subjects of that information – that the disclosing party may use to support their claims or defenses, unless the use would be solely for impeachment:

Individual	Contact Information¹	Subject Matter
Marshall County Sheriff Phil Sims	423 Blount Avenue Guntersville, AL 35976 (256) 582-2034	Protests in Marshall County, Passage of Resolution

¹Source of contact information: <https://www.marshallco.org/departments/commission/commission.html> as retrieved on April 8th, 2023.

Individual	Contact Information	Subject Matter
Marshall County Commission Chairman James Hutcheson	424 Blount Avenue Guntersville, AL 35976 (256) 571-7701	Passage of Resolution
Marshall County Commission District 1 Ronny Shumate	3850 Eddy Scant City Rd Arab, AL 35016 (256) 753-2557	Passage of Resolution
Marshall County Commission District 2 Rick Watson	21 1st Avenue West B Grant, AL 35747 (256) 728-4117	Passage of Resolution
Marshall County Commission District 3 Lee Sims	2251 Oneonta Cut Off Albertville, Al 35950 (256) 891-1771	Passage of Resolution
Marshall County Commission District 4 Joey Baker	123 Hustleville Rd Albertville, Al 35950 (256) 878-0421	Passage of Resolution
Marshall County Commission Clerk Rhonda McCoy	424 Blount Avenue Guntersville, AL 35976 (256) 571-7701	Passage of Resolution, County Documents
Marshall County Commission County Administrator Ashleigh Bubbett	424 Blount Avenue Guntersville, AL 35976 (256) 571-7701	Passage of Resolution, County Documents
Marshall County Commission Attorney Clint Maze	424 Blount Avenue Guntersville, AL 35976	Passage of Resolution

3. **Rule 26(a)(1)(A)(ii)** – A copy – or a description by category and location – of all documents, electronically stored information, and tangible things that the disclosing party has in their possession, custody, or control and may use to support their claims or defenses, unless the use would be solely for impeachment.

Description	Location
Photos and videos of Plaintiff's previous protests.	Google Drive / YouTube

Description	Location
Potentially (but not likely) there are some public documents, case files, photos, videos, and documents not synchronized to Plaintiff's Google account.	Plaintiff's 4 terabyte computer hard drive that is currently inaccessible due to a hardware failure.
Public documents, case files, photos, videos, and documents that were synchronized to Plaintiff's Google account.	Google Drive synchronized with Plaintiff's computer hard drive in a backup computer.
Public documents from Defendants website.	Marshall County Alabama website including but not limited to https://www.marshallco.org/minutes/minutes.html
"BlueLeaks" hacked files of Department of Homeland Security, police departments, and white supremacist organizations.	https://ddosecrets.com

4. **Rule 26(a)(1)(A)(iii)** – A computation of each category of damages claimed by the disclosing party, who must also make available for inspection and copying as under Rule 34 the documents or other evidentiary material (unless privileged or protected from disclosure) on which each computation is based, including materials bearing on the nature and extent of injuries suffered:

5. The Plaintiff has suffered irreparable harm and has been deprived of his First Amendment constitutional rights as outlined in the Complaint.

6. General Compensatory and Statutory damages of \$10,000 to compensate for the restriction of the Plaintiff's First Amendment rights (42 U.S. Code § 1983).

7. Punitive damages in the amount of \$5,000 to act as a deterrent for future unlawful actions.

8. Plaintiff's cost, time, and expenses for litigation.

9. Any such other relief the Court deems as necessary, just, and proper under law.

10. Rule 26(a)(1)(A)(iv) – For inspection and copying, any insurance agreement under which an insurance business may be liable to satisfy all or part of a possible judgment in the action or to indemnify or reimburse for payments made to satisfy the judgment:

11. No insurance disclosures for the Plaintiff.

Respectfully submitted this 17th day of April, 2023.



Gary Wayne Wright II

Plaintiff, Pro Se

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Dated: *4/17/2023*

Gary Wright II
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Montgomery, AL 36106-2354

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UNITED STATES DISTRICT COURT
MONTGOMERY DISTRICT OF ALABAMA

Honorable Judge R. David Prector
Hugo L. Black Federal Courthouse
1729 5th Avenue North
Birmingham, AL 35203

35203-200099

