

**IN THE PROBATE COURT OF SHELBY COUNTY, TENNESSEE**

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IN RE: MICHAEL JEROME WILLIAMS, JR.  
A/K/A MICHAEL JEROME OHER

CAUSE NUMBER: C-010333  
DEMAND FOR JURY TRIAL

MICHAEL JEROME OHER  
WARD AND PETITIONER

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**TUOHYS' RESPONSES TO FIRST SET OF REQUESTS FOR PRODUCTION OF  
DOCUMENTS PROPOUNDED TO CO-CONSERVATORS BY PETITIONER**

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COMES NOW Sean Tuohy and wife Leigh Anne Tuohy by and through counsel and file these Responses to the First Set of Requests for Production of Documents propounded to them.

**REQUESTS FOR PRODUCTION**

REQUEST NO. 1: Please produce all DOCUMENTS YOU anticipate offering into evidence during the trial of this CAUSE.

RESPONSE: Respondents have not made any decisions regarding any documents to be offered as evidence in the trial of this matter.

REQUEST NO. 2: Please produce all demonstrative evidence YOU anticipate using during the trial of this cause as discovery is ongoing.

RESPONSE: Respondents have not made any decisions regarding any demonstrative evidence anticipated to be offered as evidence in the trial of this matter.

REQUEST NO. 3: For any and all expert witnesses identified in YOUR responses to Interrogatories in this CAUSE, please provide the following:

- a. A copy of the resume and/or curriculum vitae for each such expert;

- b. Any written opinions and/or conclusions of any such expert;
- c. Any documents reviewed by or relied up on by each such expert in forming his or her respective opinions;
- d. Any notes by or correspondence to and from any such expert; and
- e. Any and all other documents relied by each such expert in forming his or her respective opinions.

RESPONSE: Respondents have not hired any expert witness to be used at this trial of this matter at this time. Should Respondents choose to file an expert to give testimony at trial the Respondents will file Rule 26 disclosures pursuant to the Tennessee Rules of Civil Procedure.

REQUEST NO. 4: Please produce all articles, texts, treatises, and publications upon which YOU or YOUR experts rely or may rely on in support of YOUR claims.

RESPONSE: See Response to Request No. 3.

REQUEST NO. 5: Please produce all expert reports, summaries, memos or other DOCUMENTS by YOUR experts RELATING in any way to this CAUSE.

RESPONSE: See Response to Request No. 3.

REQUEST NO. 6: Please produce all DOCUMENTS identified in YOUR responses to the First Set of Interrogatories.

RESPONSE: The Life Story Agreement is being produced with these Responses.

REQUEST NO. 7: Please produce all DOCUMENTS that YOU reviewed to answer or respond to the First Set of Interrogatories.

RESPONSE: See response to Request No. 6.

REQUEST NO. 8: Please produce copies of any and all CORRESPONDENCE

YOU have had, electronically or otherwise, CONCERNING Michael Oher.

RESPONSE: The parties have agreed to a mutual forensic expert who will obtain all electronic communications by and between the parties. The parties have agreed to review same and exchange those which are related to this matter. The Respondents are not in possession of any other documents responsive to this request.

REQUEST NO. 9: All DOCUMENTS and COMMUNICATIONS

CONCERNING Michael Oher.

RESPONSE: . See Response to Request No. 8.

REQUEST NO. 10: All DOCUMENTS and COMMUNICATIONS with Michael

Oher.

RESPONSE: See Response to Request No. 8.

REQUEST NO. 11: All DOCUMENTS and COMMUNICATIONS, including but not limited to contracts, agreements, and notices CONCERNING *THE BLIND SIDE*.

RESPONSE: See attached Life Story Agreement.

REQUEST NO. 12: All DOCUMENTS and COMMUNICATIONS

CONCERNING royalties paid to YOU or the TUOHY FAMILY from *THE BLIND SIDE*.

RESPONSE: See the accounting previously filed in this matter.

REQUEST NO. 13: An accounting of all monies received and expended by YOU or the TUOHY FAMILY on behalf of Michael Oher.

RESPONSE: Objection. Overly broad and unduly burdensome. The Tuohys have

supported Michael Oher since 2003 or 2004 through his years in college as well as paying some of his bills while he was a professional. These expenditures by the Tuohys on behalf of Mr. Oher include room and board, clothing, two vehicles, spending money sent to Mr. Oher during his college years, approximately \$1,000.00 per month, presents for various occasions including but not limited to birthdays and Christmas. See account for all monies received by the Tuohys on behalf of Mr. Oher.

REQUEST NO. 14: All contracts or agreements RELATING TO or entered into by YOU on behalf of Michael Oher.

RESPONSE: None.

REQUEST NO.15: All DOCUMENTS and COMMUNICATIONS, including but not limited to, records of monies received by YOU or the MAKING IT HAPPEN FOUNDATION CONCERNING or RELATING TO Michael Oher, appearances by the TUOHY FAMILY, *THE BLIND SIDE*, Twentieth Century Fox, Alcorn Entertainment, and books written by the TUOHY FAMILY, including but not limited to, *In a Heartbeat: Sharing the Power of Cheerful Giving* by YOU and *Turn Around: Reach Out, Give Back, and Get Moving* by YOU.

RESPONSE: Objection. Overly broad, unduly burdensome, and further not calculated to lead to the discovery of admissible evidence. These Respondents have previously provided information regarding speaking engagements by the Tuohy family to counsel for Petitioner.

REQUEST NO. 16: YOUR tax returns from 2004 through present.

RESPONSE: Objection. Overly broad and unduly burdensome. The Tuohys will provide the tax returns in their possession upon the execution of an agreed protective order.

REQUEST NO.17: All filings, DOCUMENTS, and COMMUNICATIONS

RELATED TO the CAUSE.

RESPONSE: All in the possession of the Tuhoys have been tendered to Petitioner.

REQUEST NO. 18: All DOCUMENTS and COMMUNICATIONS

CONCERNING YOUR representation that Michael Oher is YOUR adopted son.

RESPONSE: None. The Tuohys have never intended to refer to Michael Oher as their adopted son in such a way as to create a legal relationship. All such references have been colloquial in nature.

REQUEST NO. 19: For internet photo, still image and video sharing website accounts that YOU have used and/or maintain(ed) an account with, please provide a copy of all non-privileged content/data shared on said account(s) which include the name, likeness, or image of Michael Oher. In the event YOU contend there is a privilege to assert, please provide a privilege log.

RESPONSE: See website of the Making It Happen Foundation.

REQUEST NO. 20: All COMMUNICATIONS between YOU and Michael Oher's mother, Denise Oher.

RESPONSE: None.

REQUEST NO. 21: Please produce a copy of any deposition which YOU have given in any prior civil or criminal proceedings.

RESPONSE: None.

REQUEST NO. 22: All DOCUMENTS CONCERNING payments made to YOU

or the TUOHY FAMILY from the MAKING IT HAPPEN FOUNDATION.

RESPONSE: None, although Sean Tuohy did receive a check for \$170.00 as reimbursement for an expense inadvertently paid from his personal account.

Respectfully submitted,

BALLIN, BALLIN & FISHMAN, P.C.



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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this the 4<sup>th</sup> day of December, 2023, a true and correct copy of the foregoing Response has been sent via the Court's ECF system, U.S. Mail and/or electronic mail to the following:

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