



5. I have reviewed the discovery provided by Defendants Laura Ricciardi, Moira Demos, and Chrome Media LLC and found only 5 emails produced after December 18, 2015.

6. Attached as exhibit 4 is an article wrote by John Ferak that was located on the internet : <https://patch.com/wisconsin/across-wi/andy-colborn-ried-sue-buting-strang-john-ferak>.

Dated this 4<sup>th</sup> day of November, 2022.



Debra L. Bursik

4402667

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

**vs.**

**NETFLIX, INC.; CHROME MEDIA LLC,  
F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA  
DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484-BHL**

**DEFENDANTS LAURA RICCIARDI, MOIRA DEMOS, AND CHROME MEDIA LLC'S  
RESPONSES AND OBJECTIONS TO PLAINTIFF'S  
SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS**

Defendants Chrome Media, LLC f/k/a Synthesis Films, LLC; Laura Ricciardi; and Moira Demos (collectively, the "Producer Defendants") hereby object and respond to Plaintiff Andrew Colborn's Seventh Request for Production of Documents to the Producer Defendants (the "Requests"):

**GENERAL RESPONSE AND GENERAL OBJECTIONS**

1. The Producer Defendants are responding to the Requests as they interpret and understand them. The Producer Defendants reserve the right to supplement their objections and/or responses herein if Colborn subsequently asserts an interpretation of the Requests that differs from the Producer Defendants' understanding.

2. The Producer Defendants object to the Requests in their entirety and to each individual Request to the extent they are not proportional to the needs of the case considering the



parties' relative access to relevant information, the parties' resources, the importance of the discovery in resolving the issues, and the burden and expense that will result to the Producer Defendants in locating and producing the requested documents (if they even exist) compared to any benefit to Colborn or relevance to the case.

3. The Producer Defendants object to each Request to the extent that each calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, tax return privilege, or any other applicable privilege, doctrine, or immunity. Nothing contained in these responses and objections is intended as, nor should in any way be deemed, a waiver of any attorney-client privilege, work product doctrine, common interest and/or joint defense privilege, tax return privilege, or any other applicable privilege, doctrine, or immunity. No such waiver will result from any inadvertent disclosure of material or information protected from discovery by the attorney-client privilege, attorney work product doctrine, the common interest and/or joint defense privilege, tax return privilege, or any other applicable privilege, doctrine, or immunity.

4. The Producer Defendants object to each Request to the extent that it calls for the disclosure of material that is confidential, proprietary and/or private, or that intrudes upon third parties' privacy or other legal interests.

5. The Producer Defendants object to each Request to the extent that it calls for the disclosure of material protected from disclosure under Article I, § 2(b) of the California Constitution, California Evidence Code section 1070, Wisconsin Statutes section 885.14 and the Wisconsin Constitution, any other applicable state's or jurisdiction's reporters' privilege or shield laws, the First and Fourteenth Amendments to the United States Constitution, and/or the common law reporters' privilege.

6. The Producer Defendants object to each Request to the extent that it seeks to impose obligations upon the Producer Defendants greater than those imposed by the Federal Rules of Civil Procedure and/or the Local Rules of the Eastern District of Wisconsin.

7. The Producer Defendants object to the Requests to the extent they seek information protected from disclosure by any statute, rule, or regulation.

8. The Producer Defendants object to the Requests to the extent that they seek information (1) not currently in the Producer Defendants' possession, custody, or control, or (2) that the Producer Defendants cannot locate after a reasonably diligent search. The Producer Defendants also object to the Requests to the extent they seek to subject the Producer Defendants to unreasonable and undue annoyance, oppression, burden, and expense; and/or seek to impose upon the Producer Defendants an obligation to investigate or discover information or materials from sources equally accessible to Colborn.

9. The Producer Defendants object to each Request to the extent that it is vague, overbroad, and unduly burdensome and costly to the Producer Defendants.

10. Notwithstanding the specificity of the Producer Defendants' responses set forth below, the Producer Defendants expressly incorporate this General Response and these General Objections by reference as though fully set forth into its specific objections to each of the Requests. Thus, if any objection contained above is not restated under the specific response to an individual Request, then this should not be construed as a waiver of any such objections.

### **RESPONSES TO REQUESTS FOR PRODUCTION**

#### **REQUEST FOR PRODUCTION NO. 1:**

All documents and communications between you and any person(s) relating to the allegations and claims asserted in the Second Amended Complaint and/or the Challenged

Statements.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants. The Producer Defendants object to the extent that Plaintiff is requesting discovery regarding *Making a Murderer 2*, as the operative Second Amended Complaint does not put *Making a Murderer 2* at issue, and thus discovery regarding it is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, is not proportional to the needs of the case, and is overbroad and unduly burdensome.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the

Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this Request, that are between the Producer Defendants and other persons, and that mention Plaintiff and relate to portions of *Making a Murderer* that are put at issue by the Second Amended Complaint.

**REQUEST FOR PRODUCTION NO. 2:**

All documents and communications that in any way mention plaintiff or James Lenk in any defendant's possession.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants. The Producer Defendants object to the

extent that Plaintiff is requesting discovery regarding *Making a Murderer 2*, as the operative Second Amended Complaint does not put *Making a Murderer 2* at issue, and thus discovery regarding it is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, is not proportional to the needs of the case, and is overbroad and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for documents not within their possession.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this Request, that mention Plaintiff or James Lenk, and that relate to portions of *Making a Murderer* that are put at issue by the Second Amended Complaint.

**REQUEST FOR PRODUCTION NO. 3:**

All documents and communications that in any way mention an antagonist in any defendant's possession.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as unintelligible (including but not limited to the phrase "in any way mention an antagonist"), vague, ambiguous, overbroad and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including



without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants. The Producer Defendants object to the extent that Plaintiff is requesting discovery regarding *Making a Murderer 2*, as the operative Second Amended Complaint does not put *Making a Murderer 2* at issue, and thus discovery regarding it is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, is not proportional to the needs of the case, and is overbroad and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for documents not within their possession.

**REQUEST FOR PRODUCTION NO. 4:**

All documents and communications that reference James Lenk and Sheriff Ken Petersen were aware of the 1995 call, that is a the [sic] subject of this lawsuit, prior to 2000.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense

privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents that reasonably can be determined to be responsive to this Request that the Producer Defendants can locate through a reasonable search and diligent inquiry.

**REQUEST FOR PRODUCTION NO. 5:**

All documents and communications that reference the Plaintiff was on the verge of being named in the civil lawsuit brought by Steven Avery prior to the Halbach murder.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other

applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents that reasonably can be determined to be responsive to this Request that the Producer Defendants can locate through a reasonable search and diligent inquiry.

**REQUEST FOR PRODUCTION NO. 6:**

All documents and communications that in anyway mention Kevin Rahmlow in defendant's possession.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other

confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for documents not within their possession.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents that reasonably can be determined to be responsive to this Request that the Producer Defendants can locate through a reasonable search and diligent inquiry.

**REQUEST FOR PRODUCTION NO. 7:**

All documents and communications relating plaintiff's call to dispatch as referenced in Paragraphs 30 to 40 of the Second Amended Complaint.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade

secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this Request and that mention Plaintiff and relate to portions of *Making a Murderer* that are put at issue by the Second Amended Complaint.

**REQUEST FOR PRODUCTION NO. 8:**

All documents and communications relating to plaintiff and James Lenk's searches of Steven Avery's trailer in connection with Teresa Halbach.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin,

California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this Request and that mention Plaintiff and relate to portions of *Making a Murderer* that are put at issue by the Second Amended Complaint.

**REQUEST FOR PRODUCTION NO. 9:**

All documents and communications relating to the key to Teresa Halbach's SUV, referenced in Paragraphs 41 to 45 of the Second Amended Complaint, including but not limited to its location at all times, its discovery in Steven Avery's trailer, and any DNA found on it.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from

discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this Request and that mention Plaintiff and relate to portions of *Making a Murderer* that are put at issue by the Second Amended Complaint.

**REQUEST FOR PRODUCTION NO. 10:**

Please produce a copy of all documents and communications, computer files or telephone records obtained from law enforcement showing any evidence of phone calls or dispatch notes from November 2005 involving the Manitowoc County Sheriff's Department. This should include, but is not limited to, CAD reports, dispatch narratives, incident reports, telephone bills or records and TIME printouts.



**RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: the Producer Defendants have not obtained any such responsive documents, files or records; however, as Plaintiff and his counsel are aware, the Producer Defendants have served document subpoenas in this action and may receive responsive material to same (and Plaintiff will receive copies of such material too).

**REQUEST FOR PRODUCTION NO. 11:**

All documents that you intend to use as exhibits at trial.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks



material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants. The Producer Defendants also object to this Request as premature and reserve the right to supplement and to use additional documents as exhibits at trial in addition to those produced in response to this Request.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents that reasonably can be determined to be responsive to this Request that the Producer Defendants can locate through a reasonable search and diligent inquiry, although the Producer Defendants note that they have not determined all the documents intended for use at trial yet and reserve the right to supplement and to use additional documents as exhibits at trial in addition to those produced in response to this Request and to otherwise identify and use exhibits as consistent with the requirements of the Federal Rules of Civil Procedure and Evidence and any other operative rules.

**REQUEST FOR PRODUCTION NO. 12:**

All documents that you contend constitute admissions against interest by Plaintiff.

**RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

The Producer Defendants incorporate by reference each objection set forth in the General Response and General Objections above as if fully stated here. The Producer Defendants further object to this Request as vague, ambiguous, overbroad, and unduly burdensome. The Producer Defendants also object to this Request to the extent that it calls for material that is protected from discovery by the attorney-client privilege, work product doctrine, the common interest and/or joint defense privilege, or any other applicable privilege, doctrine or immunity, including

without limitation the applicable reporter's privilege and/or reporter's shield under Wisconsin, California, any other applicable state or jurisdiction, federal and/or common law. The Producer Defendants object to this Request to the extent it calls for a legal conclusion. The Producer Defendants further object to this Request to the extent it calls for material disclosing a trade secret or other confidential research, source, development, or commercial information, and/or material protected from disclosure by the Producer Defendants' and/or third parties' rights of privacy. The Producer Defendants also object to this Request on the grounds that it seeks material that is not relevant or reasonably calculated to lead to the discovery of any admissible evidence, and to the extent it is not proportional to the needs of the case and would impose an undue burden and expense on the Producer Defendants. The Producer Defendants also object to this Request as premature and reserve the right to supplement and to use additional documents as exhibits at trial in addition to those produced in response to this Request.

Subject to and without waiving their objections, and subject to their understanding of this Request, the Producer Defendants respond as follows: To the extent not already produced, the Producer Defendants will produce non-privileged documents that reasonably can be determined to be responsive to this Request that the Producer Defendants can locate through a reasonable search and diligent inquiry, although the Producer Defendants note that they have not determined all the documents intended for use at trial yet and reserve the right to supplement and to use additional documents as exhibits at trial in addition to those produced in response to this Request and to otherwise identify and use exhibits as consistent with the requirements of the Federal Rules of Civil Procedure and Evidence and any other operative rules.

Dated: April 6, 2022

Respectfully submitted,

s/ Kevin L. Vick

Kevin L. Vick

Meghan Fenzel

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*Counsel for Defendant Laura Ricciardi, Moira  
Demos, and Chrome Media, LLC*

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Los Angeles, State of California. My business address is 355 South Grand Avenue, Suite 2450, Los Angeles, CA 90071.

On April 6, 2022, I served true copies of the following document(s) described as

**DEFENDANTS LAURA RICCIARDI, MOIRA DEMOS, AND CHROME MEDIA LLC'S RESPONSES AND OBJECTIONS TO PLAINTIFF'S SEVENTH REQUEST FOR PRODUCTION OF DOCUMENTS**

on the interested parties in this action as follows:

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Netflix, Inc.*

**BY ELECTRONIC SERVICE:** I caused the said document(s) to be transmitted by e-mail to the person(s) at the email address(es) listed above. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

**BY FIRST-CLASS MAIL:** I deposited said document(s) in a sealed envelope(s) with the United States Postal Service at Los Angeles, California, for delivery, with the postage fully prepaid. I am “readily familiar” with this firm’s practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. postal service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party(ies) served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on April 6, 2022, at Los Angeles, California.



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Marlene Rios

# JASSY|VICK|CAROLAN

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Kevin L. Vick  
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August 26, 2022

VIA EMAIL

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George Burnett, Esq.  
Law Firm of Conway, Olejniczak & Jerry, S.C.  
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April Rockstead Barker, Esq.  
Rockstead Law, LLC  
525 N. Lincoln Ave.  
Beaver Dam, WI 53916

Re: *Colborn v. Netflix, et al.*

Dear Ms. Sommers:

I write to follow up on our meet and confer call on August 16, 2022, and to address your letter dated August 23, 2022.<sup>1</sup>

Plaintiff's Failure to Timely Raise His Concerns or Justify His Belated Attempt to Do So

As I detailed in my August 10, 2022 correspondence and reiterated during our August 16, 2022 call, Plaintiff's complaints are untimely because the discovery deadline expired months ago. During our August 16, 2022 call you suggested that the issues raised in your July 15, 2022 letter had been previously raised by Plaintiff in May 2022. That is incorrect. After our call, I reviewed the parties' correspondence (letter and email) and it confirms that none of Plaintiff's attorneys raised those issues in May 2022 or any other time prior to your July 15, 2022 letter. Nor did counsel raise the purported deficiencies at the Producer Defendants' depositions back in May 2022. The parties' previous meet and confer communications earlier in this case addressed

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<sup>1</sup> My previous correspondence dated August 10, 2022, addressed a number of concerns you mentioned in your July 2022 meet and confer correspondence to me. To the extent you did not raise issues originally mentioned in your July correspondence during our August 16, 2022 call or in your more recent August 23, 2022 letter, we will presume that my August 10, 2022 letter and our meet and confer discussions already addressed those issues satisfactorily.



August 26, 2022

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only the various *Defendants'* complaints about deficiencies in *Plaintiff's* document production and responses to written discovery. This is not a continuation of an ongoing discussion but an attempt to belatedly raise foundational objections long after the appropriate time has passed.

As I have previously explained, it is too late now—long after the close of fact discovery on April 8, 2022—for Plaintiff to belatedly raise complaints that have been waived. Your suggestion in your August 23, 2022 letter that “we are still in discovery” is incorrect, with the exception of expert discovery which still remains. The Court’s operative Scheduling Order makes clear that fact discovery closed on April 8, with the exception of Plaintiff’s deposition which had been scheduled for later as expressly set forth in the Court’s Scheduling Order.

The case law is clear that any attempt by Plaintiff to belatedly raise concerns is untimely and without merit. As one Eastern District of Wisconsin court put it, “If there is a bright line when it comes to when a motion to compel may be brought it is the discovery deadline. ‘[M]otions to compel filed after the close of discovery are almost always deemed untimely.’” *Henneman v. Fed. Check Recovery*, No. 10-C-746, 2011 WL 1900183, at \*2 (E.D. Wis. May 19, 2011) (quoting *In re Sulfuric Acid Antitrust Litig.*, 231 F.R.D. 331, 332 (N.D.Ill.2005), which in turn cites *Packman v. Chicago Tribune Co.*, 267 F.3d 628, 647 (7th Cir.2001)).

As the Eastern District of Wisconsin recently explained in a case denying a party’s untimely motion to compel:

Courts commonly deny motions to compel filed after the close of discovery. *See, e.g., Justise v. Zenith Logistics, Inc.*, 186 F. App’x 680, 682-83 (7th Cir. 2006) (denying motion to compel after discovery had closed and summary judgment motion filed); *Packman*, 267 F.3d at 647 (denying motion filed after discovery had closed and the summary judgment briefing schedule had been set); *Rossetto v. Pabst Brewing Co., Inc.*, 217 F.3d 539, 542 (7th Cir. 2000) (“The motion was filed two months after the date set by the court for the completion of discovery. The plaintiffs gave (and give) no excuse for their tardiness, and so have no grounds for complaining about the district court’s welcome effort to expedite the litigation and spare the parties the expense of protracted discovery, the bane of modern litigation.”).

*Williams v. Sam’s E., Inc.*, No. 18-CV-1355-PP, 2021 WL 4427563, at \*4 (E.D. Wis. Sept. 27, 2021).

Indeed, “[u]nder some circumstances, courts have found motions filed *before* the discovery deadline to be untimely.” *Wilbur v. Cnty. of Waukesha*, No. 14-CV-0046-PP, 2016 WL 4082666, at \*3–4 (E.D. Wis. July 29, 2016) (denying motion to compel as untimely where motion was filed on last day before discovery deadline and explaining, “In light of the lengthy discovery period, the absence of any explanation for the last-minute filing, the multiple extensions of the discovery period, the plaintiff’s knowledge of the impasse some two weeks prior to the filing of the motion, and the fact that granting this motion would require yet another



extension of the discovery period, the court finds that this motion is untimely.”). The types of objections you raised for the first time in July 2022, questioning the scope of the Producer Defendants’ document collection and search terms, could have and should have been raised long ago. Laying in wait and then springing this objection long *after* the Producer Defendants and their counsel have already expended great time and effort (and at great expense) in collecting, reviewing and producing documents is particularly unfair and unreasonable.

The Producer Defendants have been reasonable and accommodating with respect to discovery, including agreeing to permit Plaintiff to take multiple third-party depositions after the expiration of the deadline to do so. However, Plaintiff has never explained why, in the exercise of diligence and good faith, he could not have raised the issues now being belatedly addressed months ago at the appropriate time. Nor could he possibly do so. *See Kruse, Inc. v. Hogan*, No. 1:10-CV-00014, 2011 WL 3747353, at \*1–2 (N.D. Ind. Aug. 24, 2011) (party raising belated discovery complaints must show good cause, prior diligence, and excusable neglect); *Dantzer v. City of Milwaukee*, No. 10-C-0675, 2012 WL 3201882, at \*1 (E.D. Wis. Aug. 3, 2012) (same). Indeed, one of Plaintiff’s chief complaints concerns the scope of what the Producer Defendants agreed to produce in response to Plaintiff’s third set of requests for documents. 8/23/22 letter at 2. Plaintiff served those document requests in June 2021, and the Producer Defendants served the responses about which Plaintiff now complains in *July 2021*. It is improper for Plaintiff to lay in wait for an entire year—until well past the close of fact discovery—before belatedly raising complaints about the scope of what the Producer Defendants agreed to produce.<sup>2</sup>

Out of professional courtesy, we have been willing to confer with you regarding the questions you have raised about the Producer Defendants’ document production. However, summary judgment motions are due in three weeks, and initial expert disclosures are due next Friday. Throughout this case, I have not been one to point fingers or make accusations. But Plaintiff’s newfound and untimely focus on purported discovery deficiencies is starting to feel like gamesmanship. It is not fair for Plaintiff to continue trying to divert the Defendants’ focus and resources from those aspects of this case to focus on Plaintiff’s discovery concerns that were waived long ago.

While I address below certain subjects you raised during our August 16, 2022 call and in your August 23, 2022 letter, I do so only out of professional courtesy, not because Plaintiff has any right to further exploit the discovery process to place even greater burdens on the Producer Defendants those already imposed by Plaintiff’s seven sets of requests for production. *See also Williams*, 2021 WL 4427563 at \*4 (“The plaintiff asks why, if discovery had closed, defense counsel responded to her letters and other contacts. The fact that defense counsel did not ignore the plaintiff and continued to try to explain why it had responded the way it did is not relevant to the question of whether discovery had closed.”)

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<sup>2</sup> In addition, the request itself was incredibly overbroad, and the Producer Defendants agreement to produce documents within the scope of what they agreed to produce was more than reasonable.



Text messages

I can confirm what I told you during our call: we collected text messages from our clients and reviewed them. None were produced because none fell within the scope of what the Producer Defendants agreed to produce. By way of example, there were only a couple text messages that referenced Plaintiff, but they concerned Season 2 (and even then, only related to logistics surrounding an attempt to contact Plaintiff to see if he was interested in being interviewed). As you are aware, that put them outside the scope of what the Producer Defendants agreed to produce in response to Plaintiff's various requests for production.

Scope of Document Search and Production

The Producer Defendants' search and production efforts were not limited to only communications with Netflix personnel but included communications with others in general. To answer a question in your August 23, 2022 letter, when we searched emails for Lenk and Colborn and variations/misspellings of Colborn, that search was not limited to only emails with people in the @netflix.com domain; it included communications with others too more generally. In addition, the Producer Defendants produced documents that related to portions of *Making a Murderer* put at issue by the Second Amended Complaint that mentioned not just Colborn personally, but law enforcement more generally, which I understand from our August 16, 2022 call was one of your concerns. Moreover, the Producer Defendants' searches of their emails included all of their accounts, not just the synthesisfilms.com email accounts, which was another question you had.

Your August 23, 2022 letter erroneously claims that I "insisted on the disclosure of plaintiff's list of search terms." That is not true. I never even raised the issue of search terms, let alone "insisted" on their disclosure. Plaintiff may have voluntarily provided a list of search terms to defense counsel with respect to searches of Mr. Colborn's text messages on April 5, 2022 (not to all of his document searches, however, just texts). However, the parties—despite agreeing to a robust ESI protocol—never agreed to exchange search terms and Plaintiff never raised the subject contemporaneously when document collection and production efforts were underway. Instead, you only belatedly raised the issue more than three months after the close of fact discovery, more than four months after the final sets of document requests were served, and long after the Producer Defendants and their counsel went to great lengths and spent an extraordinary amount of time collecting, reviewing, processing and producing documents in the course of fulfilling their discovery obligations. If Plaintiff wanted to raise the issue of search terms and reach an agreement regarding them, he could have sought to do so at the appropriate time. However, Plaintiff failed to do so, and we are now many months past the close of fact discovery.

Fifth Set of Requests for Production and Request No. 10 of the Seventh Set of Requests

I can confirm that we produced all the documents that we agreed to produce in response to these two requests. I would also note that these requests are quite targeted and narrow,

focusing on materials obtained from law enforcement *related to phone calls and dispatch notes from November 2005 from MTSO*—not from other sources such as the court clerks, attorneys involved in the underlying legal proceedings, and not materials obtained from law enforcement pursuant to, e.g., the Wisconsin Open Record Law, that relate to different subject matters. I believe that during our August 16, 2022 call there was some reference to these requests more broadly implicating the Producer Defendants’ “due diligence” efforts with respect to *Making a Murderer* in general. And your August 23, 2022 letter appears to do so again. See August 23, 2022 Letter at 2. However, the requests from Plaintiff that you have identified are far more limited for the reasons explained above. In any event, the Producer Defendants have produced voluminous materials related to their due diligence efforts—just not in response to these particular two narrow requests for phone calls and dispatch notes from November 2005 from MTSO.

“Antagonist”

While under no obligation to do so, we performed another follow up search for the term “antagonist” and located no documents that fell within the scope of the documents that the Producer Defendants agreed to produce. Again, while under no obligation to provide this information, I will tell you to avoid unnecessary further disagreements that the small number (three) of documents that contained that term related to Season 2 of *Making a Murderer*, and none of them mentioned or related to Plaintiff.

\* \* \* \* \*

This should address the concerns that you raised during our August 16, 2022 meet and confer call and your August 23, 2022 letter. There are, of course, additional points and arguments I could make or, in many instances, reiterate here, including points and arguments previously made in my August 10, 2022 correspondence or in co-defendant Netflix’s July 29, 2022 and August 16, 2022 letters responding to similar concerns that Plaintiff has raised with respect to Netflix’s document production. Rather than repeating myself and Netflix’s counsel here, I will simply reference that correspondence.

The Producer Defendants have more than complied with their obligations under the Federal Rules of Civil Procedure with respect to Plaintiff’s seven sets of requests for production. The Producer Defendants produced nearly 35,000 pages of documents, plus more than 15 hours of raw footage of Plaintiff’s testimony at the Avery criminal trial. Ms. Demos and Ms. Ricciardi personally spent more than 250 hours combined in connection with responding to Plaintiff’s requests. And their counsel spent many, many hundreds of additional hours in connection to responding to Plaintiff’s requests for production—at very considerable time, effort and cost.<sup>3</sup> Any suggestion that the Producer Defendants have not gone above and beyond their discovery obligations in this case is wholly without merit. Regardless of whether Plaintiff might disagree

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<sup>3</sup> In addition, Plaintiff served extremely overbroad subpoenas on numerous third parties who formerly worked with the Producer Defendants, resulting in the production of more than 17,600 additional pages, the vast majority of which the Producer Defendants’ counsel reviewed for privilege issues, again at considerable time, effort and expense.

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with that, he long ago waived the ability to raise any such disagreement and he has no excuse for waiting until now—with summary judgment and initial expert disclosures imminent—to belatedly raise any concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read "K. Vick", written in a cursive style.

Kevin L. Vick

CC: Leita Walker, Ballard Spahr LLP



*Law Firm of*  
**CONWAY, OLEJNICZAK & JERRY, S.C.**

Since 1976

August 23, 2022

*Christina D. Sommers*  
*CDS@lcojlaw.com*

Attorney Kevin L. Vick  
Jassy Vick Carolan LLP  
800 Wilshire Blvd., Ste. 800  
Los Angeles, CA 90017

**Re: Manitowoc County Case No. 2018 CV 561 - Andrew L. Colborn v. Netflix, Inc., et al**

Dear Attorney Vick:

On July 15, 2022 we sent our notice of deficiencies to you, and when we received no response we sent a follow-up letter on July 28, 2022. You responded by letter on August 10, 2022, and with vacation schedules, we first were able to set a meet and confer conference on August 16, 2022. This letter serves to memorialize that conversation and work towards resolving plaintiff's concerns regarding the deficiencies of Chrome, Ms. Demos and Ms. Ricciardi.

Although discovery issues could have been raised earlier, we are still in discovery and parties have continued to make productions as the need arises. Chrome first started producing documents in November 2021 and was still producing documents a month ago.

You indicated that you had searched emails of Moira Demos and Laura Ricciardi for the domain of @netflix.com and that search returned approximately 5,000 emails. These 5,000 emails were then searched for relevance. In addition, you searched the emails for Lenk and Colborn and variations/misspellings of Colborn, and those documents were produced. It is unclear if you searched only the @netflix.com domain for Colborn and Lenk, or if you searched the entire production.

We asked that you disclose your list of search terms, and you indicated that you would think about disclosing them and would get back to us by early the week of August 22, 2022. You said that, like Netflix, you were reluctant to provide your search terms because they could have been requested in the ESI protocol. However, when you insisted on the disclosure of plaintiff's list of search terms, we provided them to all counsel via email on April 5, 2022.

At a minimum, can you confirm if the following search terms were used for the email and text productions: cops, law enforcement, planting, planted, plant, accused, guilty, frame, framed, lied, and set-up?



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August 23, 2022  
Page 2

During our meet and confer, you confirmed that defendants had limited the documents to be searched for and produced. In multiple answers to our Requests for Production, you responded that “the Producer Defendants will produce non-privileged documents within their possession, custody or control that reasonably can be determined to be responsive to this request and that relate to portions of Making a Murderer that are of and concerning Plaintiff and that are put at issue by the Second Amended Complaint.” This is especially troubling with respect to your response to Request #3 in Plaintiff’s Third Set of Requests for Production of Documents, and for your entire response to Plaintiff’s Seventh Set of Requests for Production of Documents, which requested communications with “other individuals or entities” or with “any person(s)”. It seems from your response that the search was limited to those documents that mention “Colborn”, which is wholly inadequate. Again, if you produce the search terms, that will assist us in determining whether we maintain that defendants’ responses are deficient. You also conceded that running additional search terms would not be unduly burdensome.

Although you acknowledged seeing text messages from Ms. Ricciardi and Ms. Demos, not one text message has been produced from either of these defendants. This is both troubling and odd, given the fact that you complained that plaintiff’s text message production of over 6,600 text messages was deficient because his texts only went back to 2015. Last week in deposition, Lisa Dennis testified that she conversed with Ms. Demos and Ms. Ricciardi via text message, and there are also references to text messages in the Manhardt Documents, so it is obvious Ms. Ricciardi and Ms. Demos frequently text. As we expressed on the telephone call last week, it is hard to believe that not one friend or relative of Ms. Demos or Ms. Ricciardi sent one text message regarding Colborn or law enforcement’s culpability in the Avery case to either of them after the release of MAM. As you are aware, MAM was hugely successful and notorious; your clients received Emmys for their work.

We also discussed defendants’ response to requests for the production of documents obtained from law enforcement, which are contained in multiple requests. You indicated that defendants have produced documents obtained via subpoenas, but we are seeking documents that Ms. Ricciardi and Ms. Demos would have obtained prior to the release of MAM which can confirm they did due diligence prior to its release. No documents have been produced that are from any open records request made by either Ms. Ricciardi or Ms. Demos to law enforcement prior to the release of MAM in December 2015. If it is true they did their due diligence, then these documents should be available and produced.

Although we do not want to extend the deadlines or take future testimony, we need evidence to respond to appropriate summary judgment motions you and Leita Walker have indicated you are filing. Plaintiffs have worked cooperatively, responding to the numerous deficiency issues all defendants have posed.


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August 23, 2022  
Page 3

I will remind you that plaintiff allowed over 11 hours of deposition testimony to be taken of Andrew Colborn, although we had an order limiting his testimony to 7 hours. We expect the same cooperation from defendants.

Very truly yours,

**LAW FIRM OF CONWAY, OLEJNICZAK & JERRY, S.C.**

By:   
Christina D. Sommers



# Andy Colborn Tried To Sue Buting, Strang And John Ferak

P patch.com/wisconsin/across-wi/andy-colborn-tried-sue-buting-strang-john-ferak

John Ferak

September 18, 2022

Politics & Government

**For purposes of this case, I have agreed not to assert that "Making a Murderer" caused my divorce, Andy Colborn declared under oath in July.**

John Ferak, Patch Staff

Posted Sun, Sep 18, 2022 at 4:05 pm CT



Millions of people across the globe became familiar with Andy Colborn and his former mentor, Manitowoc County Sheriff's Lt. Detective James Lenk, from the award-winning Netflix documentary, "Making a Murderer." (File image/John Ferak/Wrecking Crew author )



MANITOWOC, WI —Manitowoc County Sheriff's Detective Andy Colborn's federal lawsuit against Netflix and its award-winning docu-series, "Making A Murderer," includes sworn testimony Colborn gave this summer, conceding Netflix did not cause his marriage to collapse, and that he has lost "no income due to Making A Murderer."

"Making a Murderer did not cause Ms. Maurer to avoid romantic involvement with me," Colborn declared in a sworn statement from July 21. "My relationship with Ms. Maurer harmed my relationship with my ex-wife, Ms. Colborn.

"My relationship with Ms. Maurer also harmed my relationship with my adult children," newly filed federal court records from Colborn's lawsuit against Netflix revealed.

### **Find out what's happening in Across Wisconsin with free, real-time updates from Patch.**

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Colborn stated in the court filings that his divorce became final this February.

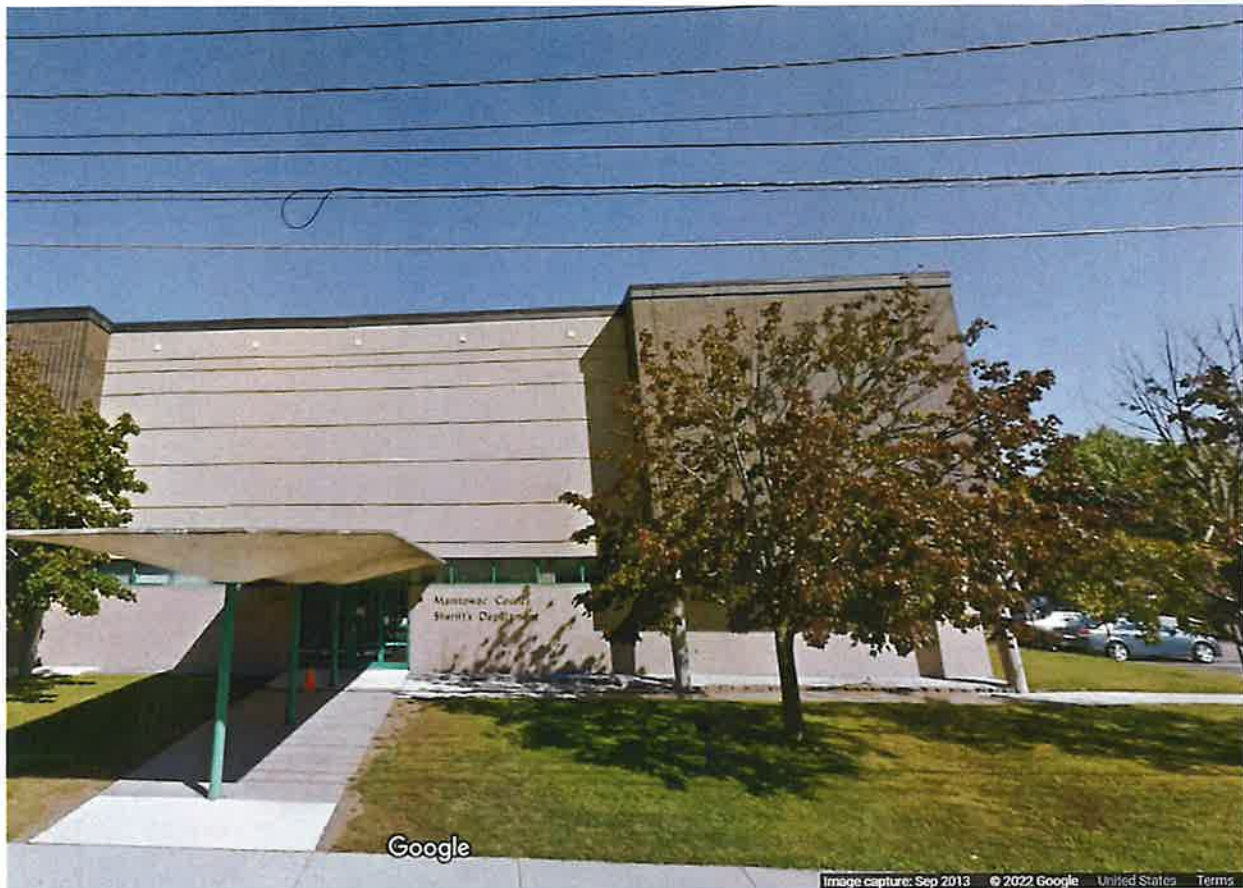
"For purposes of this case, I have agreed not to assert that 'Making a Murderer' caused my divorce," Colborn testified. "I had a romantic relationship with Jodi Maurer prior to my divorce from Ms. Colborn.

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"I moved out of the residence that I shared with Ms. Colborn in January 2021. I moved back into the residence in March 2021. I began living with Ms. Maurer at a shared residence in April 2021."





After Making A Murderer's Netflix release, Manitowoc County's Sheriff's Office became one of the most hated police agencies. Image via Google Maps

In 2018, the Manitowoc County Sheriff's lieutenant who was at the center of widespread evidence planting and police misconduct allegations in the Oct. 31, 2005 Teresa Halbach murder investigation against Steven Avery, retired from the law enforcement profession.

Millions of people across the globe became familiar with Colborn and his former mentor, Manitowoc County Sheriff's Lt. Detective James Lenk, from the award-winning Netflix documentary, "Making a Murderer."

In 2018, Colborn informed Manitowoc resident Debi Hochstetler that he just retired and was no longer in charge of her son's still-unsolved January 1999 hit-and-run fatality.

Her son, Manitowoc high school student Ricky Hochstetler, was run over and killed by a suspected drunk driver while Ricky was walking home during a snowstorm. The fatality happened around bar-closing time in rural Manitowoc, but it immediately turned into a cold-case at the Manitowoc County Sheriff's Department and there have been long-standing suspicions that the Ricky Hochstetler crime and the cover-up involved other members of the Manitowoc County Sheriff's Department including several of Colborn's eventual supervisors.



"Making a Murderer 2" is essentially three powerful stories rolled into one very powerful documentary.  
File/John Ferak

In addition to the sworn statements about his divorce, Colborn gave testimony about his previous intentions to sue Steven Avery's criminal defense trial lawyers Dean Strang and Jerry Buting.

Besides them, Colborn wanted to file a defamation lawsuit against this article's author, John Ferak, who was an investigative journalist for the USA Today Wisconsin Network when Making A Murderer debuted in December 2015.

In 2018, Ferak published "Wrecking Crew: Demolishing The Case Against Steven Avery." The true-crime book was harshly critical of Colborn, revealing how Colborn went from being a Wisconsin auto mechanic to the eventual head of the detective unit, working the administrations of Manitowoc County Sheriffs Tom Kocourek, Kenny Petersen and Rob Hermann.

A person familiar with the Colborn's Netflix case said that the statute of limitations for Colborn to file a defamation lawsuit against Strang, Buting or Ferak has now expired. He apparently approached to several lawyers, but none of them agreed to take the case.

According to this summer's lawsuit stipulations, the following statements have been entered into the court record for Colborn's pending lawsuit against Netflix:

- "I believe that Jerome Buting has damaged my reputation in out-of-court statements about me that were made after the release of Making a Murderer."
- "At one point, Mr. Colborn wanted to sue Mr. Buting for defamation."
- "At one point, Mr. Colborn wanted to sue Mr. Strang for defamation."
- "Mr. Colborn believes John Ferak has damaged his reputation."
- "At one point, Mr. Colborn wanted to sue Mr. Ferak for defamation."
- "Mr. Colborn has not watched Making a Murderer in its entirety."
- "Mr. Colborn is voluntarily participating in a documentary tentatively called Convicting a Murderer, which has not yet been released to the public."
- "Mr. Colborn voluntarily retired in 2018. Mr. Colborn had a retirement party."

**IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF WISCONSIN  
MILWAUKEE DIVISION**

**ANDREW L. COLBORN,**

**Plaintiff,**

vs.

**NETFLIX, INC.; CHROME MEDIA  
LLC, F/K/A SYNTHESIS FILMS, LLC;  
LAURA RICCIARDI; AND MOIRA  
DEMOS,**

**Defendants.**

**Civil No.: 19-CV-484-BHL**

- "Since his retirement, Mr. Colborn decided to return to the workforce and was able to find new employment."
- "Mr. Colborn filed for divorce from his now-ex-wife Barb Colborn in March 2021."
- "Mr. Colborn's divorce from Ms. Colborn was finalized in February 2022."

### **Why Colborn Wanted To Sue Avery's Lawyers**

"Mr. Colborn felt that defense theories involving the possibility that Steven Avery may have been framed for the murder of Teresa Halbach were ludicrous," July's court stipulations outlined. "He also thought that he was not being fairly portrayed by defense attorneys at Mr. Avery's trial."



"Mr. Colborn acknowledged in response to examination at the Avery criminal trial that the trial was the first time that he felt that his integrity as a law enforcement officer had been questioned."

Colborn also indicated he was told "Making A Murderer" would be a "hatchet job" and "not portray him in a favorable light."

55. Mr. Colborn's divorce from Ms. Colborn was finalized in February 2022.
56. *Making a Murderer* did not cause Mr. Colborn's divorce.
57. Mr. Colborn had an affair with Jodi Maurer while married to Ms. Colborn.
58. After filing for divorce from Ms. Colborn, Mr. Colborn moved out of the residence he shared with Ms. Colborn.
59. Mr. Colborn immediately began living together with Ms. Maurer at a shared residence.
60. *Making a Murderer* did not cause Ms. Maurer to avoid romantic entanglement with Mr. Colborn.
61. Mr. Colborn's infidelity irreparably harmed his relationship with his ex-wife, Ms. Colborn.
62. Mr. Colborn's infidelity also harmed his relationship with his adult children.



"Mr. Colborn believes that Jerome Buting has damaged his reputation in out-of-court statements about Mr. Colborn that were made after the release of *Making a Murderer*," court records reveal. "Mr. Colborn believes that Dean Strang has damaged his reputation in out-of-court statements about Mr. Colborn that were made after the release of *Making a Murderer*."

46. Mr. Colborn's faith community supported him after the release of *Making a Murderer*.
47. No one has confronted Mr. Colborn as a result of *Making a Murderer*.
48. Mr. Colborn voluntarily retired in 2018.
49. In 2016, Mr. Colborn was already preparing to retire from the Manitowoc County Sheriff's Office in no more than three years.
50. Mr. Colborn had a retirement party.
51. Upon announcing his retirement, Mr. Colborn received supportive calls from dozens of people.
52. Since his retirement, Mr. Colborn decided to return to the workforce and was able to find new employment.
53. Mr. Colborn has not lost income due to *Making a Murderer*.

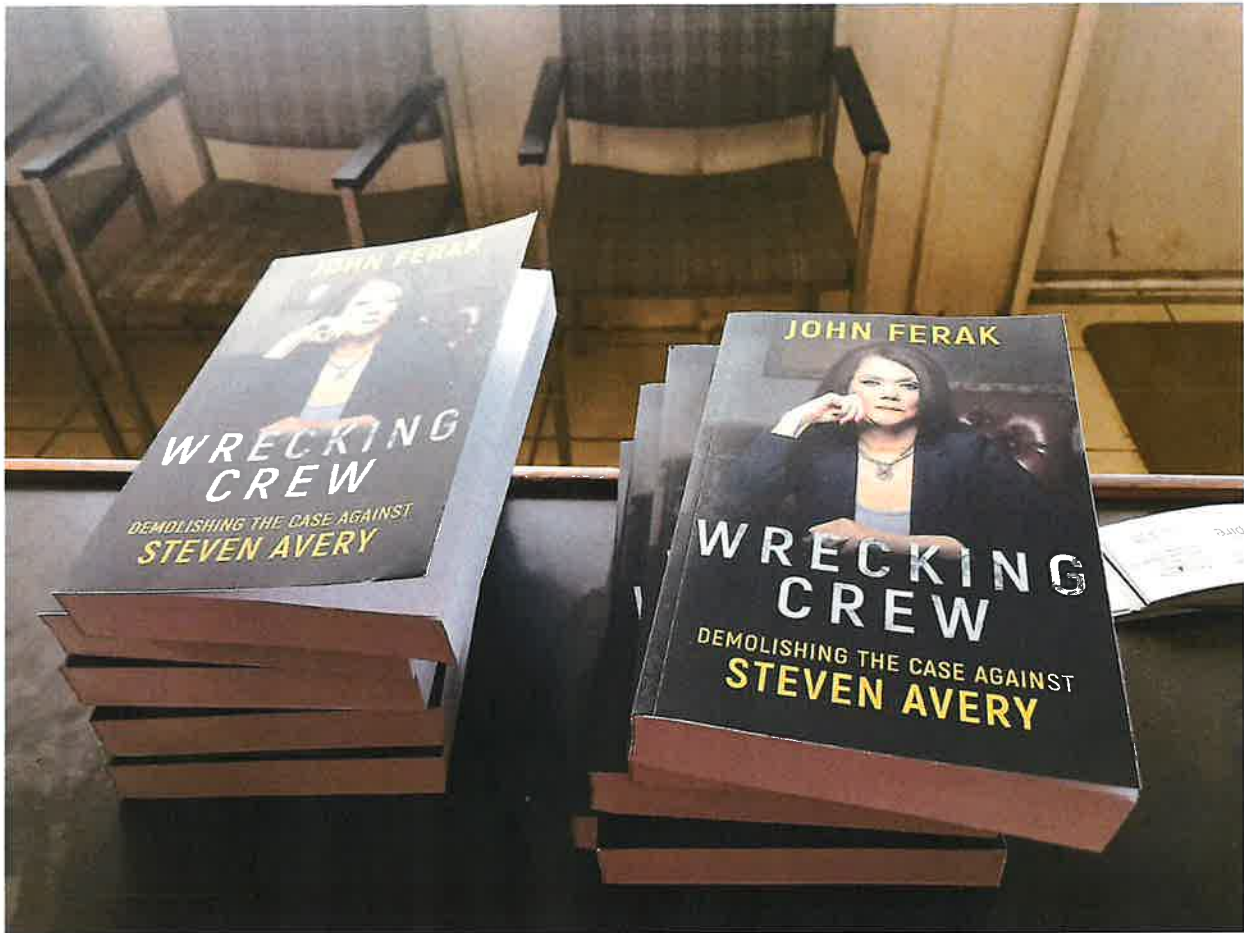
**Past Andy Colborn Coverage:**

[Avery lawsuit video: Sgt. Andrew Colborn](#)

[Lt. Colborn Rips John Ferak's Reporting On Steven Avery](#)

['Making A Murderer' Manitowoc County Deputy Colborn Retires](#)

[At Manitowoc, glowing job reviews norm, not exception in sheriff's command staff](#)



In 2018, Ferak published "Wrecking Crew: Demolishing The Case Against Steven Avery." File/John Ferak

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