

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

STATE OF GEORGIA :
v. : Case No. 23SC188947
CATHLEEN LATHAM, ET AL. :
Defendants :

DEFENDANT CATHY LATHAM'S NOTICE OF PROPOSED TESTIMONY

Defendant Cathy Latham files this Notice of Proposed Testimony and respectfully submits to the Court and the parties that, in the event that the evidence were re-opened regarding the various motions to dismiss or to disqualify the District Attorney for Fulton County Fani T. Willis and/or Special Prosecutor Nathan Wade from the prosecution of this action that Ms. Latham would offer the testimony of attorney Manny Arora former adjunct professor at Georgia State School of Law and Board Certified in criminal law.

On Thursday, February 29, Mr. Arora spoke via telephone with undersigned counsel for Ms. Latham. Following is a summary of the proposed testimony which was provided by Mr. Arora to counsel for Ms. Latham:

- Between September through October 2023, Mr. Arora had several conversations with attorney Terrence Bradley regarding the relationship between District Attorney Willis and Nathan Wade;
- In the course of Mr. Bradley's and Mr. Arora's discussions, Mr. Bradley told Arora the following:

- 1) Mr. Wade had definitely begun a romantic relationship with Ms. Willis during the time that Ms. Willis was running for District Attorney in 2019 through 2020;
- 2) After the election during Ms. Willis' transition, she had Mr. Wade supervise the transition including hiring and firing candidates after interviews; and
- 3) Mr. Bradley stated that he had personal knowledge of the relationship between Mr. Wade and district Attorney Willis, including details regarding the use of Ms. Robin Yeartie's apartment such as Mr. Wade's having a garage opener to the property.

THEREFORE, in the event that the Court re-opens the hearing to receive additional evidence, as requested by the State and Defendant former President Trump, Ms. Latham requests that the defense be permitted to subpoena Mr. Arora and present Mr. Arora's testimony relating to the matters set forth herein.

Respectfully submitted, this 4th day of March, 2024.

CROMWELL LAW, LLC

/s/ William G. Cromwell
WILLIAM G. CROMWELL
GA. BAR NO. 197240
Counsel for Cathleen Latham

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CERTIFICATE OF SERVICE

I hereby certify that I have this 4th day of March 2024, filed the foregoing filing with the Court using the Court's Odyssey eFile Ga system, serving copies of the filing on all counsel of record in this action, and furthermore have sent a copy of the filing to the parties and the Court.

CROMWELL LAW, LLC

/s/William G. Cromwell
WILLIAM G. CROMWELL
GA. BAR NO. 197240
Counsel for Cathleen Latham

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