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**THIRD JUDICIAL DISTRICT COURT
SALT LAKE COUNTY, STATE OF UTAH**

JEFFREY D. GASTON,

Plaintiff,

vs.

JASON HALL, an individual, NATALIE
HALL, an individual, GEORGE
SCHLIESSER, an individual, and
WOODCRAFT MILL & CABINET, INC., a
Utah corporation.

Defendants.

**HALL DEFENDANTS' RULE 26(a)
INITIAL DISCLOSURES**

Case No.: 230905528

Judge Chelsea Koch

Defendants Jason Hall, Natalie Hall, and Woodcraft Mill & Cabinet Inc. (collectively, the
“**Hall Defendants**”), through counsel, and pursuant to Rule 26(a)(1) of the Utah Rules of Civil
Procedure, make the following Initial Disclosures.

INTRODUCTORY STATEMENT

The information disclosed herein is preliminary in nature due to the early stage of this

litigation, and is based on information and knowledge presently and reasonably available to the Hall Defendants. It is anticipated that further investigation and analysis may lead to additions and changes to the information contained in these Initial Disclosures. Accordingly, the Hall Defendants reserve the right to supplement these Initial Disclosures pursuant to Rule 26(d) of the Utah Rules of Civil Procedure. These Initial Disclosures are provided without prejudice to the Hall Defendants' right to produce witnesses, documents, or other evidence that may later be discovered or believed to be relevant. The Hall Defendants' Initial Disclosures herein are made without waiving: (1) the right to object on the grounds of competency, privilege, relevancy and materiality, hearsay, or any other proper ground, or the right to object to the use of any information disclosed herein for any purpose, in whole or in part, in any subsequent proceeding in this action or in any other action; and (2) the right to object on any and all grounds, at any time, to any other discovery request or proceeding involving or relating to the subject matter of these disclosures consistent with governing Utah Rules of Civil Procedure.

I. RULE 26(a)(1)(A)(i) AND (ii)

A. Individuals Likely to Have Discoverable Information Supporting the Hall Defendants' Claims or Defenses and Fact Witnesses Who the Hall Defendants May Call in Their Case-in-Chief and a Summary of Their Expected Testimony.

The following individuals are believed to have discoverable information supporting the Hall Defendants' claims or defenses in this case and the Hall Defendants may call one or more of the following individuals as witnesses at trial:

1. Jason Hall, c/o Dentons Durham Jones Pinegar, 111 South Main Street, Ste. 2400, Salt Lake City, UT 84111; (801) 415-3000. Mr. Hall has knowledge and information related to, and is expected to testify regarding the anonymous emails, gag gifts, and letters sent to Mr. Gaston,

the alleged assault at Old West Days, and the veracity of the claims lodged against Mr. Hall.

2. Natalie Hall, c/o Dentons Durham Jones Pinegar, 111 South Main Street, Ste. 2400, Salt Lake City, UT 84111; (801) 415-3000. Ms. Hall has knowledge and information related to, and is expected to testify regarding the smear letters, Mr. Gaston's claim of running for mayor, the alleged assault at Old West Days, and the damage caused to the Hall family.

3. A representative of Woodcraft Mill & Cabinet, Inc., c/o Dentons Durham Jones Pinegar, 111 South Main Street, Ste. 2400, Salt Lake City, UT 84111; (801) 415-3000. A representative of Woodcraft has knowledge and information related to, and is expected to testify regarding the company's lack of involvement in the alleged conduct relating to Gaston's claims.

4. Wendy Aston, waston@bluffdale.com; (801) 608-9181. Ms. Aston has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

5. Kyle Crockett, 1058 West Stone Fly Drive, Bluffdale, Utah, 84065; (801) 628-0730. Mr. Crockett has knowledge and information related to, and is expected to testify regarding the alleged assault at Old West Days.

6. Traci Crockett, 1058 West Stone Fly Drive, Bluffdale, Utah, 84065; (702) 588-9819, tracicrockett@gmail.com / tcrockett@bluffdale.com. Ms. Crockett has knowledge and information related to, and is expected to testify regarding the alleged assault at Old West Days.

7. Jeffrey Gaston, c/o Scalley Reading Bates Hansen & Rasmussen, P.C., 15 West South Temple, Suite 600, Salt Lake City, Utah 84101. (801) 531-7870. Mr. Gaston has knowledge and information related to, and is expected to testify regarding the facts and circumstances of his

claims in this case, his defenses related to the Counterclaim, including the specific events described in this case.

8. Mark Hales, mhales@bluffdale.com; (801) 907-5588. Mr. Hales has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

9. David Hall, (801) 633-6830. Mr. Hall has knowledge and information related to, and is expected to testify regarding the veracity of the allegations against Mr. Hall in this case.

10. Joshua Hall, joshhallsemail@gmail.com. Mr. Hall has knowledge and information related to, and is expected to testify regarding the veracity of the allegations against Mr. Hall in this case.

11. Dave Kallas, (801) 310-0038. Mr. Kallas has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

12. Bruce Kartchner, (801) 554-3223. Mr. Kartchner has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

13. Gerry LaPorte, Riley Welch LaPorte & Associates Forensic Laboratories, P.O. Box 70 Frankenmuth, MI 48734; laportede@aol.com; (517) 819-4277. Mr. LaPorte has knowledge and information related to, and is expected to testify regarding the veracity of the allegations against

Mr. Hall.

14. Mark Reid, 15683 Thunder Gulch Drive, Bluffdale, Utah 84065; mreidut@yahoo.com / mreid@bluffdale.com; (801) 232-6067. Mr. Reid has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

15. Connie Robbins, c/o Scalley Reading Bates Hansen & Rasmussen, P.C., 15 West South Temple, Suite 600, Salt Lake City, Utah 84101. (801) 531-7870. Ms. Robbins has knowledge and information related to, and is expected to testify regarding the facts and circumstances of his claims in this case, his defenses related to the Counterclaim, including the specific events described in this case.

16. Greg Rogers, s2lockback@yahoo.com; (801) 577-7756. Mr. Rogers has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case and in the criminal case brought against Mr. Hall.

17. Cindy Strong, (801) 949-3546. Ms. Strong has knowledge and information related to, and is expected to testify regarding the alleged assault at Old West Days.

18. Derk Timothy, dtimothy@bluffdale.com; (801) 455-6004. Mr. Timothy has knowledge and information related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

19. Deb Wangsgard, (801) 694-4264. Ms. Wangsgard has knowledge and information

related to, and is expected to testify regarding the factual background of the smear letters, the veracity of the allegations in those letters, and the veracity of the allegations against both Mr. and Ms. Hall in this case.

20. Any witness identified by any other party in this matter in their Initial Disclosures or supplements thereto.

21. All persons deposed in connection with these proceedings.

22. All persons referenced in documents produced by any party in connection with these proceedings.

23. All persons who produce documents in response to any subpoena issued in relation to this case.

24. All persons referenced or identified in responses to interrogatories, requests for admissions, or other discovery responses propounded by or prepared by any other party in this matter.

25. Any record custodian witness whose testimony is necessary to lay the foundation for any documents used at trial.

II. RULE 26(a)(1)(B)

A. Documents Hall Defendants May Offer into Evidence as Part of Their Case-in-Chief.

Documents that the Hall Defendants may offer into evidence as part of their case-in-chief (HALL0001 – HALL0542) will be provided. Additionally, the Hall Defendants may offer any of the following into evidence as part of their case-in-chief:

1. Any documents obtained through discovery in this case.

2. Any documents disclosed by any other party in this case.

3. Any documents used as exhibits in any depositions taken in this case.

The Hall Defendants' collection and review of documents is ongoing. The Hall Defendants reserve the right to supplement these disclosures as additional information becomes available and to the extent required by the Utah Rules of Civil Procedure.

III. RULE 26(a)(1)(C)

A. Computation of Damages.

The Hall Defendants seek compensatory, punitive, and other relief as follows, and will supplement as discovery proceeds pursuant to Utah R. Civ. P. 26(a)(1) and 26(d):

1. Compensatory damages (not less than \$300,000), comprised of the following general and special damages: attorney fees and costs incurred in connection with the criminal prosecution of Jason Hall; severe emotional distress and attendant symptoms; and reputational harm. The Hall Defendants anticipate presenting expert testimony to quantify and apportion these non-economic damages, namely those associated with reputational and emotional damages.

2. Punitive damages under Utah Code § 78B-8-201 based on willful and malicious, intentionally fraudulent, and/or reckless conduct, in an amount sufficient to punish and deter.

3. Attorneys' fees and costs to the maximum extent permitted by law, and any other applicable fee-shifting statute or doctrine, together with taxable costs.

4. Pre- and post-judgment interest as allowed by law.

The foregoing amounts are based on currently available information, including known fee invoices, third-party costs, and other related charges, in addition to documented emotional and reputational harm. Discovery is ongoing, and the Hall Defendants expressly reserve the right to amend, refine, and increase their damages computation and supporting evidence as additional

records, expert opinions, and discovery materials are obtained.

IV. RULE 26(a)(1)(D)

A. Agreements under which any Person may be Liable to Satisfy All or Part of a Judgment, or to Indemnify or Reimburse for Payments Made to Satisfy the Judgment.

The Hall Defendants are not aware of any such agreements.

V. RULE 26(a)(1)(E)

A. Documents Referenced in Pleadings.

Documents referenced in the Hall Defendants' pleadings are included in the documents identified above. The Hall Defendants' review is ongoing and they reserve the right to supplement these disclosures.

DATED September 29, 2025.

DENTONS DURHAM JONES PINEGAR

/s/ Jacob R. Lee
Trinity Jordan
Lyndon R. Bradshaw
Jacob R. Lee

*Attorneys for Jason Hall, Natalie Hall, and
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