

# Exhibit A

IN THE CHANCERY COURT OF PUTNAM COUNTY, TENNESSEE  
FOR THE THIRTEENTH JUDICIAL DISTRICT AT COOKEVILLE

LINDSAY PRIDE,

Petitioner,

v.

COOKEVILLE REGIONAL MEDICAL  
CENTER AUTHORITY,

Respondent.

FILED 3/2 20 23  
TIME 2:26 pm  
LINDA F. REEDER, CLERK & MASTER  
BY Regenia Henry  
DEPUTY CLERK & MASTER

No. 2023-38

**DECLARATION OF LINDSAY PRIDE IN SUPPORT OF  
PETITION FOR ACCESS TO PUBLIC RECORDS  
AND TO OBTAIN JUDICIAL REVIEW OF DENIAL OF ACCESS**

I, Lindsay Pride, hereby declare as follows:

1. I am the Petitioner in this public records action.
2. The facts stated in this Declaration are within my personal knowledge and are true and correct.

3. I submit this Declaration in support of this action with knowledge of my pleading obligations under the Tennessee Rules of Civil Procedure.

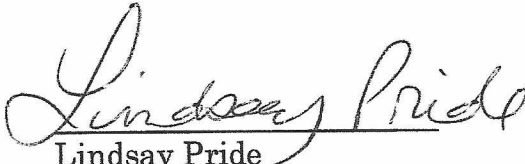
4. I am a citizen of Tennessee; I reside in Putnam County, Tennessee.

5. I am currently the editor at the *Herald-Citizen* and cover news in Putnam County.


6. On August 29, 2022, I sent a public records request via email to Paul Korth, the Chief Executive Officer of Cookeville Regional Medical Center, and his Executive Assistant, Mindy Youngblood. My public records request sought: "public records that include the salaries of the top administrative positions at Cookeville

Regional Medical Center including the chief executive officer, the medical staff president, chief operating officer, chief financial officer, chief legal counsel, chief nursing officer and chief strategy officer.” A true and correct copy of that email with its attachment is attached as Attachment 1.

7. I declare under penalty of perjury under the laws of Tennessee that the foregoing is true and correct.

  
Lindsay Pride

22nd day of February, 2023

**From:** Lindsay Pride [lindsay.pride@herald-citizen.com](mailto:lindsay.pride@herald-citizen.com)   
**Subject:** FOIA

**Date:** August 29, 2022 at 1:57 PM

**To:** Mindy Youngblood [myoungblood@crmchealth.org](mailto:myoungblood@crmchealth.org), Paul D Korth [pkorth@crmchealth.org](mailto:pkorth@crmchealth.org)

LP

Good afternoon,

Please see the attached Freedom of Information Act request below.

Thanks for your help,

Lindsay

Lindsay Pride  
Herald-Citizen editor  
[lindsay.pride@herald-citizen.com](mailto:lindsay.pride@herald-citizen.com)  
(931) 526-9715



FOIA CRMC  
7-28-2022.doc

# Herald-Citizen

Jack McNeely, Publisher  
Lindsay Pride, Editor

PO Box 2729  
Cookeville, TN 38502-2729  
(931) 526-9715

Aug. 29, 2022

Mindy Youngblood  
Executive Assistant  
Cookeville Regional Medical Center  
1 Medical Center Boulevard  
Cookeville, TN 38501

Dear Mindy Youngblood:

Under the Tennessee Open Records Act, 10-7-503 et seq., I am requesting to inspect or obtain copies of public records that include the salaries of the top administrative positions at Cookeville Regional Medical Center including the chief executive officer, the medical staff president, chief operating officer, chief financial officer, chief legal counsel, chief nursing officer and chief strategy officer.

If there are any fees for searching or copying these records, please inform me if the cost will exceed \$50. However, I would also like to request a waiver of all fees in that the disclosure of the requested information is in the public interest since Cookeville Regional Medical Center is a publicly owned hospital, and citizens of Cookeville have repeatedly contacted staff at the Herald-Citizen newspaper requesting this information, especially given that the former city mayor who is also the chief strategy officer at the hospital endorsed three of the new city council members in the Aug. 4 city council election. This information is not being sought for commercial purposes.

The Tennessee Open Records Act requires a response time within seven days. If access to the records I am requesting will take longer than this amount of time, please contact me with information about when I might expect copies or the ability to inspect the requested records.

If you deny any or all of this request, please cite each specific exemption you feel justifies the refusal to release the information and notify me of the appeal procedures available to me under the law.

Thank you for considering my request.

Sincerely,

Lindsay Pride  
Herald-Citizen editor  
931-526-9715

**Cookeville Newspapers, Inc.**