

EXHIBIT A

DEFINITIONS

For purposes of this subpoena:

“Electronic Communications” means any and all messages, communications, or exchanges transmitted through any electronic medium, including but not limited to: Signal messaging application, WhatsApp, Telegram, text messages (SMS/MMS), iMessage, email, Facebook Messenger, Instagram Direct Messages, Twitter/X Direct Messages, Slack, Microsoft Teams, Discord, or any other electronic messaging platform or application.

“Documents” means all writings, recordings, and graphic matter of every type and description, however and by whomever prepared, produced, reproduced, disseminated or made, including but not limited to: correspondence, emails, text messages, instant messages, memoranda, notes, screenshots, screen captures, photographs, metadata, electronic files, drafts, and any other tangible or electronic record.

“Correspondence” means any and all communications, whether written, electronic, or recorded, including but not limited to: letters, emails, text messages, instant messages, Signal messages, voicemails, notes of conversations, and any other form of communication between parties.

YOU ARE COMMANDED to produce and permit inspection and copying of the following:

1. **All Electronic Communications and Documents** between you and Chris Clemens from January 1, 2022 through present, including but not limited to:
 - All messages with auto-delete, disappearing, or ephemeral features enabled
 - All screenshots or records showing message timer settings or deletion settings
 - All metadata showing dates, times, participants, and settings
2. **All Electronic Communications and Documents** between you and any member of the UNC-Chapel Hill Board of Trustees from January 1, 2022 through present
3. **All Electronic Communications and Documents** between you and Jed Atkins concerning Chris Clemens, Board of Trustees matters, or University of North Carolina at Chapel Hill business from January 1, 2022 through present
4. **All Correspondence and Documents** with any media outlet or journalist (including but not limited to The News & Observer, WRAL, Chronicle of Higher Education, or any reporter thereof) regarding:
 - Chris Clemens’ use of Signal or any Electronic Communications platform
 - UNC-Chapel Hill Board of Trustees matters
 - The School of Civic Life and Leadership Including all emails, messages, screenshots provided, interview notes, or any other Documents

5. **All Documents demonstrating or evidencing** who enabled, activated, or set auto-delete, disappearing, or ephemeral message features in any Electronic Communications involving university business
6. **All Documents reflecting, referring to, or evidencing** any instruction, recommendation, or discussion about using Signal or other Electronic Communications platforms with auto-delete features for university business