



IN THE DISTRICT COURT IN AND FOR TULSA COUNTY
STATE OF OKLAHOMA

IN RE THE MARRIAGE OF:

[REDACTED],
Plaintiff,

and

[REDACTED],
Defendant.

Case No. [REDACTED]

ATTORNEY LIEN CLAIMED

DISTRICT COURT
FILED

JUN 07 2016

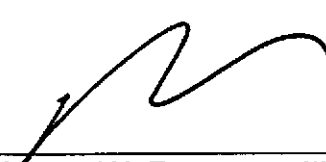
SALLY HOWE SMITH, COURT CLERK
STATE OF OKLA. TULSA COUNTY

MOTION TO QUASH SUBPOENA DUCES TECUM

COMES now, [REDACTED], by and through his attorneys of record, James W. Feamster III and Adam Carroll of the law firm of Feamster & Carroll, PLLC, and in support of his Motion To Quash Subpoena Duces Tecum states:

1. That on an unknown date, Respondent, by and through her attorney of record, David C. Fisher, delivered a Subpoena Duces Tecum (See attached Exhibit "A"), to Petitioner's attorney requiring Richard S. Hale to appear for Court June 7, 2016 at 1:30 p.m. on behalf of Respondent and to bring the following documents:
 - a. All notes, contracts, employment agreement, hours, pay rate, termination documents, recordings, voice mails, emails or messages, and any and all records pertaining to the above employee, Micah James Taylor, employee #2608564.
2. That Petitioner objects to the Subpoena Duces Tecum as it is not likely to lead to relevance.
3. Further the time period allowed and/or demanded in said Subpoena Duces Tecum is not sufficient pursuant to the Oklahoma Rules of Discovery.
4. That Respondent's Subpoena Duces Tecum should therefore be quashed.
5. That until further order of this court, all issues pertaining to said Subpoena Duces Tecum should be stayed.
6. That Petitioner should be entitled to his reasonable attorneys fees having to file his Motion to Quash Subpoena Duces Tecum.

WHEREFORE, Petitioner prays that this Motion to Quash Subpoena Duces Tecum should be granted and/or be set for hearing and that he be granted all other and further relief as may be just and proper in the premises.




James W. Feamster, III OBA #2848
Adam P. Carroll OBA #19770
Feamster & Carroll, PLLC
35 E. 18th Street
Tulsa, Oklahoma 74119
Telephone (918) 712-2686
Fax (918) 712-9222
Attorney for Petitioner

Certificate of Delivery

On June 7, 2016, I mailed, postage prepaid, by Certified U.S. Mail, return receipt requested, a true copy of the foregoing instrument to:

David Fisher
5200 Yale Ave. #101
Tulsa, OK 74135



James W. Feamster, III
Adam P. Carroll

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IN THE DISTRICT COURT IN AND FOR TULSA COUNTY

STATE OF OKLAHOMA

IN RE THE MARRIAGE OF:

_____,
Petitioner,

and

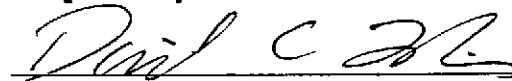
_____,
Respondent.

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NOTICE OF SUBPOENA DUCES TECUM

Take notice that Respondent, _____, has caused to be issue Subpoena Duces Tecum. This Subpoena is being issued pursuant to 12 O.S. §3234(C). Testimony will be taken, and the person(s) to whom the Subpoena is directed to is being ordered to appear before the court and to bring documents for testifying.

Respectfully submitted,



David C. Fisher, OBA#19323
5200 S. Yale Ave., Suite 200
Tulsa OK 74135-742

(918) 794-3952 - telephone

(918) 794-3954 - facsimile

E-mail: david@davidcfisher.com


ATTORNEY FOR RESPONDENT

CERTIFICATE OF DELIVERY

I, David C. Fisher, certify that on the 2nd day of June 2016, a true and correct copy of the above and foregoing was delivered/transmitted to the following:

- ☒ via first-class mail, postage fully prepaid thereon
- ☐ via certified mail, return receipt requested
- ☐ via facsimile
- ☐ via hand delivery

Adam Carroll
Feamster & Carroll, P.L.L.C
35 East 18th Street
Tulsa, OK 74119

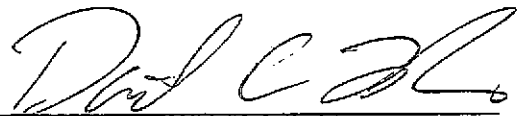


David C. Fisher

STATE OF OKLAHOMA

Respondent.

19 day of June 2016.


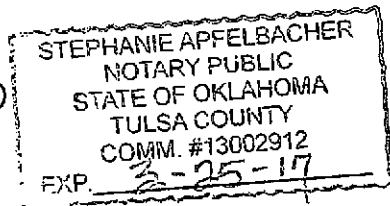


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E-mail: david@davidcfisher.com
ATTORNEY FOR RESPONDENT

This subpoena is authorized, issued and signed by the above named attorney on behalf of the above name Oklahoma Court pursuant to 12 O.S. § 2004.1 (A)3. Under the terms of subsection (B)(1) of said statute, all parties to this cause have been given notice that this subpoena has been served.

IN WITNESS WHEREOF, I have hereunto set my hand and official seal this 1st day of June, 2016.

(SEAL)



Notary Public