



IN THE DISTRICT COURT OF OKLAHOMA COUNTY
STATE OF OKLAHOMA

FILED IN DISTRICT COURT
OKLAHOMA COUNTY

IN THE MATTER OF THE MARRIAGE OF)
)
 [REDACTED])
)
 Petitioner,)
)
 And)
)
 [REDACTED])
)
 Respondent.)

MAY 11 2017
RICK WARREN
COURT CLERK
41 _____

Case No. [REDACTED]
(Judge Ogden)

**OBJECTION TO SUBPOENA DUCES TECUM TO
SPYTEC INTERNATIONAL, INC.**

COMES NOW the Respondent, [REDACTED] by and through her attorneys of record, Laura McConnell-Corbyn and Shane Riddles-Hill, and pursuant to 12 Okla. Stat. § 2004.1(C)(3)(a) respectfully Objects to the Subpoena *Duces Tecum* to Spytec International, Inc. In support thereof, Respondent would show the Court as follows:

1. On April 27, 2017, Counsel for Petitioner issued a Subpoena *Duces Tecum*, attached hereto as Exhibit "A," to the following:

SPYTEC INTERNATIONAL, INC.
Attn: Legal
135 W. 36th St., 13th Floor
New York City, New York 10018

SPYTEC INTERNATIONAL, INC.
c/o Jonathan Mark
1365 York Avenue, Apt 37D
New York City, New York 10021

2. On April 28, 2017, as part of ongoing discovery pursuant to Oklahoma law, Counsel for Respondent issued Subpoenas *Duces Tecum* to the following:

- a. Wells Fargo Bank, N.A.
- b. First United Bank
- c. Kenneth W. Klingenberg

These Subpoenas *Duces Tecum* were part of Respondent's reasonable discovery in this litigation regarding fundamental issues in the case.

3. On May 2, 2017, Counsel for Petitioner filed Objections and Motions to Quash each of the subpoenas *duces tecum* issued by Respondent. Hearings have not been set on these Motions to Quash until June 2, 2017, causing further delay in Respondent's ability to prepare her case for litigation.

4. Counsel for Respondent can only assume that Counsel for Petitioner intends to continue to object to the subpoenas *duces tecum* that Respondent may issue throughout discovery as a routine matter of Petitioner's obstinate litigation strategy. This arbitrary and capricious conduct is in bad faith and will lead to substantial waste of this Court's resources as well as unnecessary costs and fees incurred on behalf of Respondent.

5. Petitioner's Subpoena *Duces Tecum* to Spytec International, Inc., does not provide a reasonable time for compliance given Petitioner's concurrent effort to stifle Respondent's discovery.

WHEREFORE, Respondent objects to Petitioner's Subpoena *Duces Tecum* to Spytec International, Inc., and respectfully requests any and all such further relief as may be just and proper. Respondent further requests that the Court order that Petitioner should be assessed attorney's fees and costs incurred by Respondent in dealing with his efforts to obstruct discovery, and that the Court advise Petitioner that further such efforts are sanctionable.

Dated this 11th day of May, 2017.

Respectfully submitted,

Shane Riddles-Hill

Laura McConnell-Corbyn, OBA #12394

Shane Riddles-Hill, OBA #32013

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ATTORNEY FOR RESPONDENT,

████████████████████

CERTIFICATE OF SERVICE

I hereby certify that on the 11th day of May, 2017, I caused a true and correct copy of the above and foregoing *Objection to Subpoena Duces Tecum* to be placed in the U.S. mail, postage prepaid to:

Grady R. Conrad, OBA #32164
Kenneth W. Klingenberg, OBA #5079
KLINGENBERG & ASSOCIATES, P.C.
330 N.W. 13th Street
Oklahoma City, OK 73103
Tel: (405) 236-1985
Fax: (405) 236-1541
grady@kenkling.com
kwk@kenkling.com
ATTORNEYS FOR PETITIONER,
[REDACTED]


Shane M. Riddles-Hill