



**IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA**

**LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC.** \*

**PLAINTIFF,** \*

**vs.** \*

**NO. CV-2023-900163**

**LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100** \*

**DEFENDANTS.** \*

**NOTICE OF INTENT TO SERVE SUBPOENAS ON NON-PARTIES**

Take notice that upon the expiration of fifteen (15) days (or such other time as the Court has allowed) from the date of service of this notice, Plaintiff, Lake Forest Property Owners' Association, Inc., will apply to the Clerk of this Court for issuance of the attached subpoenas to be directed to the following non-parties, to produce the documents or things requested at the time and place specified in the subpoena:

**Alabama Attorney General  
Attn: Custodian of Records  
501 Washington Avenue  
Montgomery, Alabama 36104**

**Internal Revenue Service, LLC  
c/o Johnson Anthony Parker  
Attn: Custodian of Records  
2226 1<sup>st</sup> Avenue South, Unit 2023  
Birmingham, Alabama 35233**

**Federal Bureau of Investigation  
Attn: Custodian of Records  
1000 18<sup>th</sup> Street North  
Birmingham, Alabama 35203**

**Carl Winners  
104 Hope Drive  
Daphne, Alabama 36526**

**Alysia DeLancey  
190 Buena Vista Drive  
Daphne, Alabama 36526**

**James Scott  
502 Lake Shore Drive  
Daphne, Alabama 36526**

**Lisa Marie Riedel  
113 Bayview Drive  
Daphne, Alabama 36526**

Respectfully submitted,

/s/ WILLIAM G. CHASON  
WILLIAM G. CHASON (CHA079)  
[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)  
*Attorney for Plaintiff Lake Forest  
Property Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC  
11 North Water St., Ste. 13290  
Mobile, Alabama 36602  
(251) 432-5300  
(251) 432-5303 (fax)

**CERTIFICATE OF SERVICE**

I hereby certify that on the 31<sup>st</sup> day of March, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF electronic document filing system which sends notification of such filing to the following attorneys of record:

Adam M. Milam  
MILAM & MILAM, LLC  
20252 Highway 181, Suite C  
Fairhope, Alabama 36532  
[amilam@milam-law.com](mailto:amilam@milam-law.com)  
*Attorney for Defendants Lake Forest Strong,  
Doreen Knight, and Dexter Curry*

Laura M. Coker  
STONE CROSBY, P.C.  
8820 US Highway 90  
Daphne, Alabama 36526  
(251) 626-6696  
[lcoker@stonecrosby.com](mailto:lcoker@stonecrosby.com)  
*Attorney for Defendants Lynn Davis  
And Cathie Marx*

Eve Gray  
114 Malibu Circle  
Daphne, Alabama 36526  
*Pro Se Defendant*

/s/ William G. Chason

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS’ ASSOCIATION, INC.  
PLAINTIFF,

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. CV-2023-900163

vs.

LAKE FOREST STRONG, DOREEN  
KNIGHT, EVE GRAY, DEXTER  
CURRY, CATHIE MARX, LYNN  
DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

---

CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45

---

TO: **Alabama Attorney General**  
**Attn: Custodian of Records**  
**501 Washington Avenue**  
**Montgomery, Alabama 36104**

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners’ Association, Inc., within 15 days after service of this subpoena:

That **ALABAMA ATTORNEY GENERAL**, who is not a party, produce and permit said Plaintiff to copy and examine:

**DEFINITIONS**

For purposes of this request the following terms are defined as follows:

“**Document**” or “**documents**” is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail (“e-mail”), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

### **DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters, emails, and other correspondence from homeowners in the Lake Forest subdivision in Daphne, Alabama 36526 since January 1, 2021 claiming or alleging that the board of directors for the Lake Forest Property Owners' Association, Inc. (EIN # 63-0787921), including the board's past or present members, such as John Lake, Mathew Laws, Gary Gray, Davida Williams, Victoria Phelps, and/or David Dueitt, have engaged in criminal conduct, violated any laws, rules, or standards, or otherwise acted dishonestly or unethically.
2. Please produce all letters, emails, and other correspondence from representatives of a group known as "Lake Forest Strong" since January 1, 2021 related to the Lake Forest subdivision in Daphne, Alabama 36526.
3. Please produce all letters, emails, and other correspondence referenced in the NBC 15 report dated July 29, 2022. <https://myNBC15.com/newsletter-daily/community-group-sends-thousands-of-complaints-to-irs-alabama-ag-about-lake-forest-hoa>.
4. Please produce your entire file related to any investigations, audits, or reports of the board of directors for the Lake Forest Property Owners' Association, Inc. ("Association") or the Association's compliance with the IRS code and regulations.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff. Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A *Serve* as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records,**

**produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON

WILLIAM G. CHASON (CHA079)

[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)

*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER

& SLEDGE, LLC

11 North Water St., Ste. 13290

Mobile, Alabama 36602

(251) 432-5300

(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_, hereby certify and affirm in writing that I am \_\_\_\_\_ of ALABAMA ATTORNEY GENERAL, and in that role I am knowledgeable about the creation and maintenance of business records.

The within copy of records is an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena.

I further certify that these records were made and kept in the usual and regular course of a regularly conducted business activity of said company, the company made the records as a regular practice of that business activity, and the records were made by a person with knowledge of the matters set forth therein at or near the time of the acts, transactions, occurrences or events referred to therein.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
CUSTODIAN OF RECORDS

\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires:



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45

TO: Internal Revenue Service, LLC c/o Johnson Anthony Parker Attn: Custodian of Records 2226 1st Avenue South, Unit 2023 Birmingham, Alabama 35233

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners' Association, Inc., within 15 days after service of this subpoena:

That INTERNAL REVENUE SERVICE, LLC, who is not a party, produce and permit said Plaintiff to copy and examine:

DEFINITIONS

For purposes of this request the following terms are defined as follows:

"Document" or "documents" is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail ("e-mail"), cellular text messages, photographs, notes,

memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc., in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

### **DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters, emails, and other correspondence from homeowners in the Lake Forest subdivision in Daphne, Alabama 36526 since January 1, 2021 claiming or alleging that the board of directors for the Lake Forest Property Owners' Association, Inc. (EIN # 63-0787921), including the board's past or present members, such as John Lake, Mathew Laws, Gary Gray, Davida Williams, Victoria Phelps, and/or David Dueitt, have engaged in criminal conduct, violated any laws, rules, or standards, or otherwise acted dishonestly or unethically.
2. Please produce all letters, emails, and other correspondence from representatives of a group known as "Lake Forest Strong" since January 1, 2021 related to the Lake Forest subdivision in Daphne, Alabama 36526.
3. Please produce all letters, emails, and other correspondence referenced in the NBC 15 report dated July 29, 2022. <https://myNBC15.com/newsletter-daily/community-group-sends-thousands-of-complaints-to-irs-alabama-ag-about-lake-forest-hoa>
4. Please produce your entire file related to any investigations, audits, or reports of the board of directors for the Lake Forest Property Owners' Association, Inc. ("Association") or the Association's compliance with the IRS code and regulations.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff. Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A *Serve* as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records,**

**produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON  
WILLIAM G. CHASON (CHA079)  
[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)  
*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC  
11 North Water St., Ste. 13290  
Mobile, Alabama 36602  
(251) 432-5300  
(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_, hereby certify and affirm in writing that I am \_\_\_\_\_ of INTERNAL REVENUE SERVICE, LLC, and in that role I am knowledgeable about the creation and maintenance of business records.

The within copy of records is an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena.

I further certify that these records were made and kept in the usual and regular course of a regularly conducted business activity of said company, the company made the records as a regular practice of that business activity, and the records were made by a person with knowledge of the matters set forth therein at or near the time of the acts, transactions, occurrences or events referred to therein.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
CUSTODIAN OF RECORDS

\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*
\*

NO. CV-2023-900163

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45

TO: Federal Bureau of Investigation
Attn: Custodian of Records
1000 18th Street North
Birmingham, Alabama 35203

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners' Association, Inc., within 15 days after service of this subpoena:

That FEDERAL BUREAU OF INVESTIGATION, who is not a party, produce and permit said

Plaintiff to copy and examine:

DEFINITIONS

For purposes of this request the following terms are defined as follows:

"Document" or "documents" is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail ("e-mail"), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

### **DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters, emails, and other correspondence from homeowners in the Lake Forest subdivision in Daphne, Alabama 36526 since January 1, 2021 claiming or alleging that the board of directors for the Lake Forest Property Owners' Association, Inc. (EIN # 63-0787921), including the board's past or present members, such as John Lake, Mathew Laws, Gary Gray, Davida Williams, Victoria Phelps, and/or David Dueitt, have engaged in criminal conduct, violated any laws, rules, or standards, or otherwise acted dishonestly or unethically.
2. Please produce all letters, emails, and other correspondence from representatives of a group known as "Lake Forest Strong" since January 1, 2021 related to the Lake Forest subdivision in Daphne, Alabama 36526.
3. Please produce all letters, emails, and other correspondence referenced in the NBC 15 report dated July 29, 2022. <https://myNBC15.com/newsletter-daily/community-group-sends-thousands-of-complaints-to-irs-alabama-ag-about-lake-forest-hoa>.
4. Please produce your entire file related to any investigations, audits, or reports of the board of directors for the Lake Forest Property Owners' Association, Inc. ("Association") or the Association's compliance with the IRS code and regulations.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff. Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**



You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A *Serve* as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records,**

**produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON

WILLIAM G. CHASON (CHA079)

[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)

*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER

& SLEDGE, LLC

11 North Water St., Ste. 13290

Mobile, Alabama 36602

(251) 432-5300

(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_, hereby certify and affirm in writing that I am \_\_\_\_\_ of FEDERAL BUREAU OF INVESTIGATION, and in that role I am knowledgeable about the creation and maintenance of business records.

The within copy of records is an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena.

I further certify that these records were made and kept in the usual and regular course of a regularly conducted business activity of said company, the company made the records as a regular practice of that business activity, and the records were made by a person with knowledge of the matters set forth therein at or near the time of the acts, transactions, occurrences or events referred to therein.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
CUSTODIAN OF RECORDS

\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires:

**IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA**

**LAKE FOREST PROPERTY OWNERS’  
ASSOCIATION, INC.  
PLAINTIFF,**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**NO. CV-2023-900163**

**vs.**

**LAKE FOREST STRONG, DOREEN  
KNIGHT, EVE GRAY, DEXTER  
CURRY, CATHIE MARX, LYNN  
DAVIS, AND FICTITIOUS PARTIES 1-  
100**

**DEFENDANTS.**

---

**CIVIL SUBPOENA FOR PRODUCTION OF  
DOCUMENTS UNDER RULE 45**

---

**TO: Carl Winners  
104 Hope Drive  
Daphne, Alabama 36526**

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners’ Association, Inc., within 15 days after service of this subpoena:

That **CARL WINNERS**, who is not a party, produce and permit said Plaintiff to copy and examine:

**DEFINITIONS**

For purposes of this request the following terms are defined as follows:

“**Document**” or “**documents**” is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail (“e-mail”), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

**DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to “Lake Forest Strong” or its activities.
2. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to “Lake Forest Strong” or its activities.
3. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to “Lake Forest Strong” or its activities.
4. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest’s board of directors (or individual board members).
5. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest’s board of directors (or individual board members).
6. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest’s board of directors (or individual board members).
7. Please produce all documents related to “Lake Forest Strong”, including petitions, correspondence, notes, minutes, list of members, list of directors and officers, list of donors, and other records.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff.

Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time

and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A Serve@ as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents,



communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records, produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON  
WILLIAM G. CHASON (CHA079)  
[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)  
*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC  
11 North Water St., Ste. 13290  
Mobile, Alabama 36602  
(251) 432-5300  
(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_ hereby certify and affirm in writing that I am:

- CARL WINNERS
 REPRESENTATIVE OF CARL WINNERS

I am the custodian and keeper of the documents requested in this subpoena, and in that role I am knowledgeable about the creation and maintenance of these records.

The within copy of records are an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena. I further certify that these records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_\_ day of \_\_\_\_\_, 2023.

CUSTODIAN OF RECORDS

NOTARY PUBLIC
My Commission Expires:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS’  
ASSOCIATION, INC.  
PLAINTIFF,

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

NO. CV-2023-900163

vs.

LAKE FOREST STRONG, DOREEN  
KNIGHT, EVE GRAY, DEXTER  
CURRY, CATHIE MARX, LYNN  
DAVIS, AND FICTITIOUS PARTIES 1-  
100

DEFENDANTS.

---

CIVIL SUBPOENA FOR PRODUCTION OF  
DOCUMENTS UNDER RULE 45

---

TO: **Alysia DeLancey**  
**190 Buena Vista Drive**  
**Daphne, Alabama 36526**

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners’ Association, Inc., within 15 days after service of this subpoena:

That **ALYSIA DELANCEY**, who is not a party, produce and permit said

Plaintiff to copy and examine:

**DEFINITIONS**

For purposes of this request the following terms are defined as follows:

“**Document**” or “**documents**” is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail (“e-mail”), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

**DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters or emails sent to the Alabama Attorney General's office by anyone affiliated with "Lake Forest Strong".
2. Please produce all letters or emails sent to the Internal Revenue Service by anyone affiliated with "Lake Forest Strong".
3. Please produce all letters or emails sent to the Federal Bureau of Investigation by anyone affiliated with "Lake Forest Strong".
4. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
5. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
6. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
7. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
8. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
9. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
10. Please produce all documents related to "Lake Forest Strong", including petitions, correspondence, notes, minutes, list of members, list of directors and officers, list of donors, and other records.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff.

Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A Serve@ as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall

protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records, produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON  
WILLIAM G. CHASON (CHA079)  
[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)  
*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC  
11 North Water St., Ste. 13290  
Mobile, Alabama 36602  
(251) 432-5300  
(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_ hereby certify and affirm in writing that I am:

- ALYSIA DELANCEY REPRESENTATIVE OF ALYSIA DELANCEY

I am the custodian and keeper of the documents requested in this subpoena, and in that role I am knowledgeable about the creation and maintenance of these records.

The within copy of records are an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena. I further certify that these records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_ day of \_\_\_\_\_, 2023.

CUSTODIAN OF RECORDS

NOTARY PUBLIC My Commission Expires:



IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45

TO: James Scott 502 Lake Shore Drive Daphne, Alabama 36526

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners' Association, Inc., within 15 days after service of this subpoena:

That JAMES SCOTT, who is not a party, produce and permit said Plaintiff to copy and examine:

DEFINITIONS

For purposes of this request the following terms are defined as follows:

"Document" or "documents" is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail ("e-mail"), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

### **DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters or emails (including attachments) sent to or received from NBC 15 or its reporters, including Greg Peterson, related to the Lake Forest subdivision in Daphne, Alabama.
2. Please produce all letters and emails (including attachments) sent to or received from Lagniappe or its reporters related to the Lake Forest subdivision in Daphne, Alabama.
3. Please produce all letters or emails sent to the Alabama Attorney General's office by anyone affiliated with "Lake Forest Strong".
4. Please produce all letters or emails sent to the Internal Revenue Service by anyone affiliated with "Lake Forest Strong".
5. Please produce all letters or emails sent to Federal Bureau of Investigation by anyone affiliated with "Lake Forest Strong".
6. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
7. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
8. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
9. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
10. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
11. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
12. Please produce all documents related to "Lake Forest Strong", including petitions, correspondence, notes, minutes, list of members, list of directors and officers, list of donors, and other records.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

**However, you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff. Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or

copying of any or all of the designated materials or of the premises. A Serve@ as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records, produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON

WILLIAM G. CHASON (CHA079)

[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)

*Attorney for Plaintiff Lake Forest Property Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC

11 North Water St., Ste. 13290

Mobile, Alabama 36602

(251) 432-5300

(251) 432-5303 (fax)

**IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA**

**LAKE FOREST PROPERTY OWNERS’  
ASSOCIATION, INC.  
PLAINTIFF,**

**vs.**

**LAKE FOREST STRONG, DOREEN  
KNIGHT, EVE GRAY, DEXTER  
CURRY, CATHIE MARX, LYNN  
DAVIS, AND FICTITIOUS PARTIES 1-  
100**

**DEFENDANTS.**

\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*  
\*

**NO. CV-2023-900163**

**CERTIFICATE**

I, \_\_\_\_\_ hereby certify and affirm in writing that I am:

- JAMES SCOTT
- REPRESENTATIVE OF JAMES SCOTT

I am the custodian and keeper of the documents requested in this subpoena, and in that role I am knowledgeable about the creation and maintenance of these records.

The within copy of records are an exact, full, true and correct copy of said records pertaining to **those documents requested in this subpoena.** I further certify that these records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
CUSTODIAN OF RECORDS

\_\_\_\_\_  
NOTARY PUBLIC  
My Commission Expires:

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' \*  
ASSOCIATION, INC. \*  
PLAINTIFF, \*

NO. CV-2023-900163

vs. \*

LAKE FOREST STRONG, DOREEN \*  
KNIGHT, EVE GRAY, DEXTER \*  
CURRY, CATHIE MARX, LYNN \*  
DAVIS, AND FICTITIOUS PARTIES 1- \*  
100 \*

DEFENDANTS. \*  
\*  
\*

---

CIVIL SUBPOENA FOR PRODUCTION OF  
DOCUMENTS UNDER RULE 45

---

TO: **Lisa Marie Riedel**  
**113 Bayview Drive**  
**Daphne, Alabama 36526**

You are hereby commanded to do each of the following acts at the insistence of the Plaintiff Lake Forest Property Owners' Association, Inc., within 15 days after service of this subpoena:

That **LISA MARIE RIEDEL**, who is not a party, produce and permit said Plaintiff to copy and examine:

**DEFINITIONS**

For purposes of this request the following terms are defined as follows:

“**Document**” or “**documents**” is used in its broadest sense and includes the original, draft and each copy of every kind of writing or recording, including, without limitation, written correspondence, electronic mail (“e-mail”), cellular text messages, photographs, notes, memos, papers, electronic data, electronic spreadsheets, computer programs or software, etc.,

in your possession, custody, and/or control or known by you to exist, and any device from which information can be obtained and any other type of document.

### **DOCUMENTS REQUESTED**

A certified copy of the following documents (please see attached certification):

1. Please produce all letters or emails sent to the Alabama Attorney General's office by anyone affiliated with "Lake Forest Strong".
2. Please produce all letters or emails sent to the Internal Revenue Service by anyone affiliated with "Lake Forest Strong".
3. Please produce all letters or emails sent to Federal Bureau of Investigation by anyone affiliated with "Lake Forest Strong".
4. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
5. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
6. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to "Lake Forest Strong" or its activities.
7. Please produce all emails (including attachments) with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
8. Please produce all text messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
9. Please produce all Facebook private messages with Doreen Knight, Eve Gray, Dexter Curry, Cathie Marx, or Lynn Davis related to Lake Forest's board of directors (or individual board members).
10. Please produce all documents related to "Lake Forest Strong", including petitions, correspondence, notes, minutes, list of members, list of directors and officers, list of donors, and other records.

Such production and inspection may take place at the place where the documents or things are regularly kept or at some other reasonable place designated by you.

However, **you have the option to provide legible printed or electronic copies of said documents or things to counsel of record for Plaintiff, at the address indicated below.**

You may condition such activity on your part upon the payment in advance by said Plaintiff of the reasonable costs of making such copies, or an invoice for such reasonable expenses incurred by you may be enclosed with said copies and mailed to counsel of record for Plaintiff.



Said Plaintiff agrees to pay all reasonable expenses incurred by you at the aforementioned time and place. **If reproduction costs are expected to exceed \$25.00, please contact the undersigned before producing.**

You are further advised that other parties to the action in which this subpoena has been issued have the right to be present at the time of such production or inspection, should the production take place at the place where the documents and things are regularly kept or some other reasonable place designated by you.

You have the right to object at any time prior to the date set forth in this subpoena for compliance. Should you choose to object, you should communicate such objection in writing to the party causing the issuance of this subpoena and stating, with respect to any items or category to which objection is made, your reasons for such objection.

Rule 45(c) and (d), *Alabama Rules of Civil Procedure*, provides as follows:

(c) *Protection of persons subject to subpoenas.*

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena. The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying at any time before the time specified for compliance may serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. A Serve@ as used herein means mailing to the party or attorney. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce, move at any time for an order to compel the production. Such an order to compel production shall

protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3)(A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it

(i) fails to allow reasonable time for compliance;

(ii) requires a resident of this state who is not a party or an officer of a party to travel to a place more than one hundred (100) miles from the place where that person resides, is employed or regularly transacts business in person, or requires a nonresident of this state who is not a party or an officer of a party to travel to a place within this state more than one hundred (100) miles from the place of service or, where separate from the place of service, more than one hundred (100) miles from the place where that person is employed or regularly transacts business in person, except that, subject to the provisions of clause (c)(3)(B)(iii) of this rule, such a person may in order to attend trial be commanded to travel from any such place within the state in which the trial is held, or

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies, or

(iv) subjects a person to undue burden.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, or

(iii) requires a person who is not a party or an officer of a party to incur substantial expense to travel more than 100 miles to attend trial, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

(d) *Duties in responding to subpoena.*

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

**The attached "Certificate" should be executed by the custodian of the records, produced, notarized, and attached to the top of the documents produced.**

Respectfully submitted,

/s/ WILLIAM G. CHASON  
WILLIAM G. CHASON (CHA079)  
[wchason@mcdowellknight.com](mailto:wchason@mcdowellknight.com)  
*Attorney for Plaintiff Lake Forest Property  
Owners' Association, Inc.*

OF COUNSEL:

MCDOWELL KNIGHT ROEDDER  
& SLEDGE, LLC  
11 North Water St., Ste. 13290  
Mobile, Alabama 36602  
(251) 432-5300  
(251) 432-5303 (fax)

IN THE CIRCUIT COURT OF BALDWIN COUNTY, ALABAMA

LAKE FOREST PROPERTY OWNERS' ASSOCIATION, INC. PLAINTIFF,

vs.

LAKE FOREST STRONG, DOREEN KNIGHT, EVE GRAY, DEXTER CURRY, CATHIE MARX, LYNN DAVIS, AND FICTITIOUS PARTIES 1-100

DEFENDANTS.

\* \* \* \* \*

NO. CV-2023-900163

CERTIFICATE

I, \_\_\_\_\_ hereby certify and affirm in writing that I am:

- LISA MARIE RIEDEL
 REPRESENTATIVE OF LISA MARIE RIEDEL

I am the custodian and keeper of the documents requested in this subpoena, and in that role I am knowledgeable about the creation and maintenance of these records.

The within copy of records are an exact, full, true and correct copy of said records pertaining to those documents requested in this subpoena. I further certify that these records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters; were kept in the course of the regularly conducted activity; and were made by the regularly conducted activity as a regular practice.

Under penalty of perjury, I attest that the foregoing is true to the best of my knowledge. Signed this \_\_\_ day of \_\_\_\_\_, 2023. Sworn and subscribed this \_\_\_ day of \_\_\_\_\_, 2023.

CUSTODIAN OF RECORDS

NOTARY PUBLIC
My Commission Expires: