

IN THE IOWA DISTRICT COURT FOR DUBUQUE COUNTY

Paul E. Jeffries

CASE NO. LACV054295

vs. University of Dubuque and Jeffrey Bullock

SUBPOENA IN A CIVIL CASE

TO: Jason Price

YOU ARE COMMANDED to appear in the Iowa District Court for Dubuque County at the Dubuque County Courthouse, 720 Central Avenue, Dubuque, Iowa, at the date and time specified below to testify in the above case.

Date: Time:

PLEASE NOTE: If you require the assistance of auxiliary aids or services to participate in court because of a disability, immediately call your district ADA coordinator at (563) 589-4448. (If you are hearing impaired, call Relay Iowa TTY at 1-800-735-2942).

YOU ARE COMMANDED to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

Place: Date: Time:

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below.

See Attached request

Place: UD Admin Office Date: 6/5/06 Time: 9:00 a.m.

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

Location of Premises: UD Administration offices Date: 5/5/06 Time: 9:00 a.m. Party or attorney seeking: President Bullock

Issuance of subpoena: David L. Hammer on behalf of (PLAINTIFF / DEFENDANT / OTHER)

PO Box 1808 Dubuque IA 52004-1808 Phone: 563-583-4070

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify.

Clay H. Martin Clerk of District Court for Dubuque County

SEE RULE 1.1701 PARTS (2), (3), (4), IOWA RULES OF CIVIL PROCEDURE, ON REVERSE.

PROOF OF SERVICE

Date Served: 5-17-06 Place Served: 2017 University Ave.

Served on (Print Name): Jason Price Manner of Service: personal

Served by (Print Name and Title): Susan M. Hess, law clerk

DECLARATION OF SERVER

I declare under penalty of perjury and pursuant to the laws of the State of Iowa that the foregoing information contained in the Proof of Service is true and correct.

Date: 5-17-06 Signature of Server: Susan Hess, Hammer, Simon & Josa

Address of Server: 720 Laurel St, P.O. BOX 1808

Fees (if any) \$ Dubuque, IA 52005

Subpoena Duces Tecum Document Specifications

For the purposes of this subpoena, the following definitions shall apply:

1. "Communication" or "Communications" means the transmittal of information, in the form of facts, ideas, inquiries or otherwise, whether oral, written, electronic or otherwise.
2. "Document" means, without limitation, the original and all copies, drafts and translations of any information in any written, **electronic**, recorded, or graphic form, including all memoranda of oral conversations, as well as all compilations, catalogs, and summaries of information or data, whether typed, handwritten, printed, recorded, or otherwise produced or reproduced, and shall include but is not limited to any photograph, photostat, microfilm or other reproduction thereof, including without limitation each and every note, memorandum, letter, telegram, publication, telex, facsimile, circular, release, article, report, prospectus, record, financial statement, computer disk, computer tape, microfiche, e-mail, microphone, index, list, claims file, analysis chart, account book, draft, summary, diary, deposition transcript, other transcript, agreement, calendar, graph, receipt, chart, business record, insurance policy, computer print-out, contract, order, and deleted and erased computer records that may still be retrievable from hard drives, floppy disks and/or backup systems. Document also means any type of audible recording, any photograph or motion picture or video tape, and any non-identical copy thereof, either by virtue of other materials appearing thereon, such as handwriting or typewriting, or otherwise. Document includes all of the foregoing to the extent they are in your care, custody or control or the care, custody or control of any agent, employee, contractor or personal representative, and if in the control of others, to the extent they are obtainable and producible.

3. "Concerning" means relating to, referring to, reflecting, describing, substantiating, evidencing or constituting.

4. "You" means the person to whom this subpoena is directed.

You are required to produce the following:

1. All documents containing any communications between or among any of the following individuals or entities:

- a. Paul Jeffries
- b. Jason Price
- c. Janet Jamieson
- d. Alan Lisk
- e. Chris Daniels
- f. Tim Rupert
- g. Kate Conway
- h. Alfred Reims
- i. Lyall Vander Broek
- j. Alice Oleson
- k. Jane Morgan
- l. Rachel Daack
- m. Ann Pelelo
- n. Jon Barz
- o. Jerry Zurcher
- p. Bonnie Sue Lewis
- q. Ralph Scharna
- r. Robert Miller
- s. Julia McDonald
- t. James Lindsey
- u. The Des Moines Register or any employee or agent thereof
- v. The Telegraph Herald or any employee or agent thereof
- w. American Association of University Professors or any employee or agent thereof.
- x. Internal Revenue Service

2. All documents containing any matter concerning the whatwendtwrong.blogspot.com or any predecessor, successor or alter ego site.

3. All documents containing any content that has been posted, in whole or in part, on the whatwendtwrong.blogspot.com or any predecessor, successor or alter ego site.

4. All documents concerning any blog site that you have created or contracted for with any Internet blog service.

5. All documents containing any content or communication that you have posted to or on a blog site.

6. Copies of your telephone service statements or invoices for the period of June 1, 2005 through the present for any telephone device that you have contracted during that same period.

7. Copies of your ISP service statements or invoices for the period of June 1, 2005 through the date of this subpoena for any Internet service that you have contracted during that same period.

8. Copies of your account profile and webmail or email login page for each email account that you have had at any time from June 1, 2005 to the date of this subpoena.