

CLERK US DISTRICT COURT
NORTHERN DIST. OF TX
FILED

2019 JUL 10 PM 12: 04

DEPUTY CLERK 

UNITED STATES DISTRICT COURT
for the
NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

LEAF TRADING CARDS, LLC

Plaintiff(s),

v.

THE UPPER DECK COMPANY

Defendant(s).

§
§
§
§
§
§
§
§
§
§

Civil Action No. 3:17-cv-3200-N

RETURN OF SERVICE

Came to my hand on **Wednesday, July 3, 2019 at 12:18 PM**,
Executed at: **4635 MCEWEN ROAD, DALLAS, TX 75244**
within the county of **DALLAS** at **9:51 AM**, on **Monday, July 8, 2019**,
by individually and personally delivering to the within named:

JEROMY MURRAY

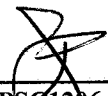
a true copy of this

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION with EXHIBITS

and tendered a witness fee of \$55.00 in Cash for one day's attendance and mileage allowed by law, per
FRCP 45(b)(1).

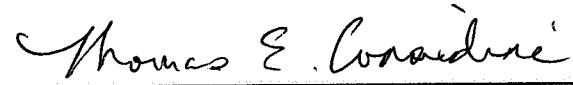
BEFORE ME, the undersigned authority, on this day personally appeared **Adil Tadli** who after being duly sworn on oath states: "My name is **Adil Tadli**. I am a person not less than eighteen (18) years of age and I am competent to make this oath. I am a resident of the State of Texas. I have personal knowledge of the facts and statements contained herein and aver that each is true and correct. I am not a party to nor related or affiliated with any party to this suit. I have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude."

By:

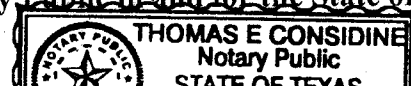


Adil Tadli - PSC 1206 - Exp 05/31/20
served@specialdelivery.com

Subscribed and Sworn to by Adil Tadli, Before Me, the undersigned authority, on this 9th day
of July, 2019.



Notary Public in and for the State of Texas



FD-88A (Rev. 12/13) Subpoena to Testify at a Deposition in a Civil Action

UNITED STATES DISTRICT COURT

for the

Northern District of Texas

Leaf Trading Cards, LLC

Plaintiff

v.

The Upper Deck Company

Defendant

Civil Action No. 3:17-cv-3200-N

SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION

To: Jeromy Murray, Beckett Grading Services, 4635 McEwen Road, Dallas, TX 75244
Telephone: (855) 777-2325

(Name of person to whom this subpoena is directed)

Testimony: YOU ARE COMMANDED to appear at the time, date, and place set forth below to testify at a deposition to be taken in this civil action. If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Place: Jackson Walker 2323 Ross Avenue, Suite 600 Dallas, Texas 75201	Date and Time: 07/24/2019 10:00 am
---	---------------------------------------

The deposition will be recorded by this method: Stenography

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: Please see Exhibit A-B.

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 07/02/2019

CLERK OF COURT

OR



Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing *(name of party)* _____
The Upper Deck Company, who issues or requests this subpoena, are:

Nicholas & Tomasevic, LLP | Craig Nicholas, Esq.
225 Broadway, Floor 19, San Diego, CA 92101 | craig@nicholaslaw.org | (619) 325-0492

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

Civil Action No. 3:17-cv-3200-N

PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for (name of individual and title, if any) _____
on (date) _____.

I served the subpoena by delivering a copy to the named individual as follows: _____

_____ on (date) _____; or

I returned the subpoena unexecuted because _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ _____ 0.00.

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

**** SEE ATTACHED ****
***** AFFIDAVIT *****

Server's address

Additional information regarding attempted service, etc.:

Federal Rule of Civil Procedure 45 (c), (d), (e), and (g) (Effective 12/1/13)

(c) Place of Compliance.

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
 - (i) is a party or a party’s officer; or
 - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, electronically stored information, or tangible things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises at the premises to be inspected.

(d) Protecting a Person Subject to a Subpoena; Enforcement.

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction—which may include lost earnings and reasonable attorney’s fees—on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing, or sampling any or all of the materials or to inspecting the premises—or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

(i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(e) Duties in Responding to a Subpoena.

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(g) *Contempt.*

The court for the district where compliance is required—and also, after a motion is transferred, the issuing court—may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

LEAF TRADING CARDS, LLC

Plaintiff,

v.

THE UPPER DECK COMPANY,

Defendant.

§
§
§
§
§
§
§
§
§

Civil Action No. 3:17-cv-3200-N

**SUBPOENA TO TESTIFY AT A DEPOSITION IN A CIVIL ACTION AND
REQUESTS FOR PRODUCTION OF DOCUMENTS TO JEROMY MURRAY**

TO: Jeromy Murray
Beckett Grading Services
4635 McEwen Road, Dallas, TX 75244

Pursuant to Federal Rule of Civil Procedure 45, you are commanded to produce documents, electronically stored information, and tangible things responsive to the following requests. Responsive items are to be produced at Jackson Walker, 2323 Ross Avenue, Suite 600, Dallas, Texas 75201, to the undersigned counsel, in accordance with the Federal Rules of Civil Procedure and Instructions and Definitions contained herein.

DEFINITIONS

As used herein, the following terms and phrases have the following meanings, unless the context requires otherwise:

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 1

1.1. “You,” and “your” means Jeromy Murray, Beckett Grading Services, and any of your past or present owners, subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, shareholders, partners, members, representatives, and any aliases, code names, or trade or business names used by any of the foregoing, or any other person acting in concert with you or any of the foregoing.

1.2. “Leaf” means Plaintiff Leaf Trading Cards, LLC and any of its past or present owners, subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, shareholders, partners, members, representatives, and any aliases, code names, or trade or business names used by any of the foregoing, or any other person acting in concert with you or any of the foregoing.

1.3. “Upper Deck” means Defendant The Upper Deck Company and any of its past or present subsidiaries, affiliates, predecessors, successors, officers, directors, agents, employees, shareholders, partners, members, agents, representatives, and any aliases, code names, or trade or business names used by any of the foregoing.

1.4. “Gray” means Leaf’s CEO, Brian Gray.

1.5. “Person” shall be deemed to include both the singular and plural and shall include natural persons, corporations, public corporations, municipal corporations, partnerships, joint ventures, groups, associations or organizations, and all federal, state, and local governments and all departments, agencies, or subunits thereof.

1.6. “Communication” means any contact or act by which information or knowledge is transmitted or conveyed between two or more persons and includes,

without limitation, written contacts (whether by letter, email, memoranda, fax, text message, social media post or message, or other document) and oral contacts (whether by face-to-face meetings, telephone conversations or otherwise).

1.7. “Document” is defined to be synonymous in meaning and equal in scope to the usage of this term in Federal Rule of Civil Procedure 34(a), and encompasses both documents and electronically stored information—including but not limited to, all correspondence, letters, Communications, text messages, memoranda, notes, agreements, contracts, proposed contracts or agreements, whether or not actually consummated, reports, summaries, agendas, bulletins, notices, announcements, instructions, charts, manuals, models, graphs, photographs, brochures, publications, books, minutes, including minutes of board of directors meetings and executive meetings, partnership meeting and management or executive partnership committee meetings, computer printouts, schedules, drawings, tape or other voice recordings, videotapes, simulations, intra- and inter-company memoranda, articles of newspapers, magazines, and other publications, telegrams, purchase orders, lists, proposals, invoices, plans, specifications, addenda, statements, receipts, confirmation slips, evidence of payments, bills, diaries, calendars, bills of lading, canceled checks, emails, any copy of a document bearing notations, markings, or writings of any kind or nature different from the original, any and all files from any personal computer, notebook, or laptop computer, or other storage device. The terms “writings,” “recordings,” and “photographs” are defined to be synonymous in meaning and equal

in scope to the usage of those terms in Fed. R. Evid. 1001. A draft or non-identical copy is a separate document within the meaning of the term “document.”

1.8. “Relating to”, “relate to”, or “related to” means making a statement about, mentioning, supporting, referring to, discussing, describing, reflecting, evidencing, identifying, dealing with, consisting of, constituting, or in any way pertaining to the subject, in whole or in part.

1.9. “Lawsuit” means the above-styled lawsuit.

1.10. “Claims” means all causes of action, factual allegations, legal allegations, anticipated defenses, and any other matter relevant to the Lawsuit.

1.11. “Complaint” means Leaf’s Complaint filed in the Lawsuit.

1.12. The connectives “and” and “or” should be construed either conjunctively or disjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside its scope.

1.13. “Any” shall mean “one or more;” “each” shall mean “each and every.”

1.14. The use of the singular form of any word includes the plural and vice versa.

INSTRUCTIONS

1. If any document requested herein was, but is no longer, in your possession, custody or control, state with particularity the disposition made of each such document, including the date of, method of and reason(s) for such disposition and the name and address, if known, of any person who has seen the document or who now has possession, custody or control thereof.

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 4

2. Possession, custody and control does not require that you have actual physical possession; instead, if you have physical control or a superior right to compel production from another, the document must be produced.

3. These document requests shall be deemed continuing in nature, and you shall produce for inspection and copying to Upper Deck any document or thing requested herein which is unavailable to Leaf at the time it submits its responses hereto, but which becomes available to it at any time prior to the trial or any hearing in this action.

4. All Documents and Electronically Stored Information shall be produced in the format and manner set out in Exhibit B, attached to these Requests.

5. These Requests do not require production of any Documents which are privileged. If You are not producing any Documents responsive to any of the numbered demands below on the basis of a claimed privilege, or for any other reason, state the following information: (i) describe the Documents with specificity; (ii) identify the privilege claimed or other reason why the Documents are not produced; (iii) state the names of all persons who participated in the preparation of the Documents; and (iv) state the names of all persons to whom the Documents were circulated or their contents communicated.

6. Unless otherwise stated, the relevant time period for these requests is January 1, 2012 to present.

REQUESTS FOR PRODUCTION

1. All COMMUNICATIONS between YOU and Brian Gray.
2. All COMMUNICATIONS between YOU and Leaf Trading Cards.
3. All DOCUMENTS relating to YOUR involvement in the creation, development, and implementation of the Beckett Grading Systems designation of "Black Label 10".
4. All COMMUNICATIONS between YOU and Joe Clemons.
5. All DOCUMENTS relating to the grading of trading cards submitted by Joe Clemons.
6. All DOCUMENTS relating to financial transactions between YOU and Joe Clemons.
7. All DOCUMENTS related to Beckett Grading Services' policies and procedures for grading trading cards.
8. All DOCUMENTS related to Beckett Grading Services policies and procedures probability of grading a trading card "Black Label 10".
9. All COMMUNICATIONS between YOU and Adam Burke.
10. All COMMUNICATIONS between YOU and Gregg Kohn.
11. All COMMUNICATIONS between YOU and Scott Jordan.
12. All DOCUMENTS relating to financial transactions between YOU and Adam Burke.
13. All DOCUMENTS relating to financial transactions between YOU and Gregg Kohn.

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 6

14. All DOCUMENTS relating to financial transactions between YOU and Scott Jordan.

15. All DOCUMENTS relating to financial transactions between YOU and Leaf Trading Cards.

16. All DOCUMENTS relating to financial transactions between YOU and Brian Gray.

Dated: July 2, 2019.

Respectfully Submitted,

/s/ Craig M. Nicholas

Craig M. Nicholas (*pro hac vice*)

Alex Tomasevic (*pro hac vice*)

Shaun Markley (*pro hac vice*)

Jake W. Schulte (*pro hac vice*)

Nicholas & Tomasevic, LLP

225 Broadway, 19th Floor

San Diego, California 92101

Phone: (619) 325-0492

Fax: (619) 325-0496

Email: cnicholas@nicholaslaw.org

Email: alex@nicholaslaw.org

Email: smarkley@nicholaslaw.org

Email: jschulte@nicholaslaw.org

Edwin Buffmire (TX SBN 24078283)

Eric D. Wong (TX SBN 24102659)

Jackson Walker LLP

2323 Ross Ave., Suite 600

Dallas, Texas 75201

Phone: 214-953-5939

Fax: 214-953-5822

Email: ebuffmire@jw.com

Email: ewong@jw.com

Attorneys for Defendant
The Upper Deck Company

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 7

EXHIBIT B – PRODUCTION PROTOCOL

Please produce documents in the following manner:

1. **PRODUCTION FORMAT FOR PAPER DOCUMENTS.** The format of productions of Hard Copy/Paper Documents shall comply with the below listed requirements:

A. IMAGE FORMAT. Documents that exist in paper format only shall be scanned and produced as single page, black and white Group IV TIFFs, created with a resolution of at least 300 dots per inch (dpi). Color documents may be produced in .JPG format in lieu of TIFF images; color .JPG files should also be provided with a resolution of at least 300 dpi. Each TIFF or .JPG image shall be branded with sequential production numbers and appropriate confidentiality designations (or other designation, pursuant to an applicable protective order). Each TIFF or .JPG image filename shall correspond to the Bates number associated with that page. File names shall not have any special characters or embedded spaces. TIFF or .JPG files shall show all text and images that would be visible to a user of the paper documents. Producing such paper documents in such form does not change their character from paper documents into ESI.

B. DATABASE LOAD FILES/CROSS-REFERENCE FILES. A production should be provided with (a) an ASCII delimited data file (.dat) using Concordance default delimiters, and (b) an Opticon (Concordance Image) image load file (.opt) that can be loaded into Relativity version 9 or above. In addition:

(i) The total number of documents referenced in a production's data load file should match the total number of designated document breaks in the Image Load file(s) in the production.

(ii) The Opticon file should provide the beginning and ending Bates number of each document and the number of pages it comprises. Each TIFF in a production must be referenced in the corresponding image load file.

(iii) Each .dat file shall include links to multi-page (document level) text files ("Text Path").

C. OCR TEXT FILES. A commercially acceptable technology for optical character recognition ("OCR") shall be used for all scanned, paper documents. Any settings such as "auto-skewing," "auto-rotation," and the like should be turned on when documents are run through the process. The filename for the multipage text file described above in 2(iii), above, shall correspond to the beginning production number of the document. If a document is redacted, the text file shall not contain the redacted portions of the documents, but should contain the remaining unredacted text.

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 8

D. METADATA & CODED FIELDS. The following information shall be produced in the delimited data file accompanying paper documents: (a) BEGBATES, (b) ENDBATES, (c) BEGATTACH, (d) ENDATTACH, (e) CUSTODIAN, (f) CONFIDENTIALITY; (g) links to the Text Path; and (h) a coded field will be provided for any hard copy documents that contain redactions.

E. UNITIZING OF DOCUMENTS. In scanning paper documents, distinct documents should not be merged into a single record, and single documents should not be split into multiple records (*i.e.*, paper documents should be logically unitized). Please use reasonable efforts to unitize documents correctly to avoid producing large numbers of documents in single “clumps.”

2. PRODUCTION FORMAT FOR ESI. The format of productions of ESI shall comply with the below listed requirements:

A. IMAGE FORMAT. All ESI documents shall be produced as single page, black and white Group IV TIFFs, created with a resolution of at least 300 dots per inch (dpi). Color documents may be produced in .JPG format in lieu of TIFF images; color .JPG files should also be provided with a resolution of at least 300 dpi. Each TIFF or .JPG image shall be branded with sequential production numbers and appropriate confidentiality designations. Each TIFF or .JPG image filename shall correspond to the Bates number associated with that page. TIFF or .JPG files shall show all text and images that would be visible to a user of the ESI documents in native format. Thus, for example notes and redlines or comparisons in documents (*i.e.*, Microsoft Word notes and redlines) shall be processed with all markings and hidden text unhidden and to show the author for the edits and comments on the TIFF or .JPG image.

B. DATABASE LOAD FILES/CROSS-REFERENCE FILES. A production should be provided with (a) an ASCII delimited data file (.dat) using Concordance default delimiters, and (b) an Opticon (Concordance Image) image load file (.opt) that can be loaded into Relativity version 9 or above.

(i) The total number of documents referenced in a production’s data load file should match the total number of designated document breaks in the Image Load file(s) in the production.

(ii) The Opticon file should provide the beginning and ending Bates number of each document and the number of pages it comprises. Each TIFF in a production must be referenced in the corresponding image load file.

(iii) Each .dat file shall include links to the Text Path.

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 9

C. TEXT FILES. The multi-page text files described above shall include text extracted from ESI with extractable text. For electronic files without extractable text (e.g., scanned paper documents) or documents produced with redactions, you shall use OCR to generate text for the document. OCR generated text shall be provided for all documents without extractable text in the original native file unless the document is comprised of handwritten notes, drawings or is otherwise not easily convertible into a searchable format. The filename for the multi-page text file shall correspond to the beginning production number of the document. File names shall not have any special characters or embedded spaces.

D. METADATA FIELDS AND PROCESSING. All applicable metadata and coding fields set forth below that can be technically extracted, without manually creating or producing metadata that does not exist, shall be produced for each document. For any given document, you are not obligated to populate manually any of the fields set forth below if such metadata cannot be extracted from that document, with the exception of the following: (a) BEGBATES, (b) ENDBATES, (c) BEGATTACH, (d) ENDATTACH, (e) CONFIDENTIALITY, and (f) a coded field will be provided for any ESI documents that contain redactions.

<i>ALL ESI DOCUMENTS</i>	<i>DESCRIPTION</i>
BEG BATES	Beginning Bates number as stamped on the production image
END BATES	Ending Bates number as stamped on the production image
BEG ATTACH	First production Bates number of the first document in a family
END ATTACH	Last production Bates number of the last document in a family
PAGE COUNT	Number of pages in document.
FILE EXTENSION	Extension for file (examples: .doc, .xlsx)
MD5HASH	
CONFIDENTIALITY	Confidentiality field populated with the word "CONFIDENTIAL" or as provided by the Protective Order
REDACTIONS	Any document produced with redactions will be identified with a redaction field populated with the word "REDACTION."
TEXT/OCR	Extracted text will be provided, if available, all other documents will be produced with OCR text.

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 10

<i>FOR EMAIL DOCUMENTS</i>	
TO	All recipients on the "TO" line
FROM	All recipients on the "FROM:" line
CC	All recipients on the "CC:" line
BCC	All recipients on the "BCC:" line
SUBJECT LINE	
DATE/TIME	GMT or EST should be selected as the time zone

SUBPOENA COMMANDING PRODUCTION OF DOCUMENTS, ELECTRONICALLY STORED INFORMATION, AND TANGIBLE THINGS - 11

CERTIFICATE OF SERVICE

On July 2, 2019, I electronically transmitted the foregoing document via electronic mail (e-mail) to the e-mail address of the addressee(s) so indicated:

Warren T. Burns
wburns@burnscharest.com

Daniel H. Charest
dcharest@burnscharest.com

Will Thompson
wthompson@burnscharest.com

Mallory Biblo
mbiblo@burnscharest.com

E. Lawrence Vincent
lvincent@burnscharest.com

Attorney for Defendant Leaf Trading, LLC

I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).



Emilia Carrillo