

CAUSE NO. _____

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IN THE DISTRICT COURT

JEFFREY LAW FIRM, P.C., and
THE WIEGAND LAW FIRM, P.C.
Petitioners,

____ JUDICIAL DISTRICT

BEXAR COUNTY, TEXAS

NOTICE OF INTENT TO TAKE THE
ORAL DEPOSITION OF MARK RATHBUN WITH SUBPOENA DUCES TECUM

TO: **Mark Rathbun, 501 Sunset, Ingleside On The Bay, Texas 78362**

1. Please take notice that, under Texas Rule of Civil Procedure 199.2, Petitioners, Jeffrey Law Firm, P.C., formerly, Jeffrey & Mitchell, P.C. (hereinafter, "Jeffrey Firm"); and The Wiegand Law Firm, P.C., (hereinafter, "Wiegand Firm"), will take the oral deposition of Mark Rathbun, at the offices of Cotton Schmidt & Abbott, L.L.P., 711 N. Carancahua, Suite 1800, Corpus Christi, Texas 78401, immediately following the deposition of Monique Rathbun on the ___ day of _____, 2017.

2. The deposition will continue from day to day until completed.

3. The deposition will be recorded stenographically. The stenographic recording will be conducted by DepoTexas (361)883-3400.

4. Under Rule 199.2(b)(5), Mark Rathbun is required to produce at the deposition the documents listed on attached Exhibit "1".



Respectfully submitted,

JEFFREY LAW FIRM, P.C.

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THE WIEGAND LAW FIRM, P.C.

/s/ w/ permission

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PULMAN, CAPPUCCIO, PULLEN, BENSON & JONES LLP

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PETITIONERS

EXHIBIT "1"

As used herein, the word "documents" means all written or electronic material of any kind.

1. A copy of all documents evidencing your purchase and/or sale of any property for the past three years.
2. A copy of your tax returns for the past five years.
3. All financial statements, balance sheets, and profit and loss statements for any business which you presently have an ownership interest or have had an ownership interest in for the past three years.
4. All financial ledgers reflecting your income, wages, expenses, and withdrawals for the past five years.
5. All monthly and yearly bank statements, cancelled checks, deposit slips, check registers, or other documents for all accounts in your name, or which you have an interest, including but not limited to checking, saving, trust, and/or money market accounts, held by you or any other person or entity on your behalf, whether such accounts are held individually or jointly, at all financial institutions at any time for the past three years.
6. All documents incident to all loans or financing obtained from any source for the past three years, including but not limited to applications, promissory notes, payment coupons, monthly and/or yearly statements, notices, correspondence, memoranda, and executed agreements such as loan agreements, guaranties, deeds of trust and security agreements.
7. All documents that relate to or concern any real property owned by you, in whole or in part, at any time in the past three years, including but not limited to the sale or purchase of such properties, including but not limited to, earnest money contracts, warranty deeds, deeds of trust, barter agreements, collateral pledge agreements, appraisals, and tax statements.
8. All documents relating to any interests, ownership, or other rights that you have in any business ventures, including but not limited to stock certificates, bills of sale, transfers, assignments, contracts, sales agreements, and partnership agreements.
9. All documents that identify the banks or any other financial institutions with which you did business for the past three years.
10. With respect to each financial institution account which was opened by or on behalf of you for the past three years, produce copies of the following documents:
 - (a) the application submitted to the financial institution,
 - (b) the initial statement issued for such account(s), and
 - (c) the most recent statement issued for such accounts(s).

11. All documents, certificates of title, purchase orders, and receipts reflecting ownership of all of your assets for the past three years.
12. Any inventories, balance sheets or other documents reflecting any assets owned by you for the past three years.
13. All documents reflecting your equity in any company including balance sheets, tax returns, retained earnings statements, K-1 tax statements, and shareholder distribution statements for the past three years.
14. All documents with information that directly or indirectly discloses the location and condition of any business owned by you whether in whole or in part.
15. All documents with information that directly or indirectly discloses any financial gifts to you in the last three years.
17. All documents that constitute or refer in any way, directly or indirectly, to any and all deeds, records, or other documents that relate to assets or property in your name or to which you claim any ownership interest.
18. All documents that refer in any way, directly or indirectly, to any items of personal property in which you own or claim an interest.
19. All documents containing any communications between you and the Church of Scientology, its members, affiliates, agents, attorneys, or anyone acting in concert with them for the last three years.
20. All documents that refer in any way, directly or indirectly, to any assets held in trust, in an estate, or in any other name or capacity in which you claim or have an interest.
21. All documents that refer in any way, directly or indirectly, to any dividends payable to you or in which you claim an interest.
22. All documents that contain or refer in any way, directly or indirectly, to the names and addresses of persons who have served as accountants, bookkeepers or financial advisers for you in the last three years.
23. All documents related to settlement of any claims you made or that were made against you in the past three years.
24. All documents that refer in any way, directly or indirectly, to any royalties or trust funds payable to you or in which you claim an interest.
25. All documents that refer in any way, directly or indirectly, to any and all motorized vehicles or equipment (including tractors, automobiles, trucks, boats, watercraft, aircraft, recreational vehicles, or motorcycles) in which you own an interest;

26. All documents that refer in any way, directly or indirectly, to any insurance policies and/or annuity contracts in which you have an interest or that insure property in which you have an interest or any insurance payments made by you in the last four years and any insurance payments due or due to become due to you.
27. All documents that constitute or refer in any way, directly or indirectly, to any appraisal of any real or personal property prepared for you or in connection with you in the past three years or that otherwise reflect the value of any real or personal property in which you have an interest.
28. All documents that evidence or refer in any way, directly or indirectly, to the amount of money owed or promised to you by any person or entity.
29. All documents that refer in any way, directly or indirectly, to any legal cause of action, either real or anticipated, by or against you.
30. All documents that contain or refer in any way, directly or indirectly, to the name and address of any person who has custody of records of salaries, commissions, bonuses, allowances, expenses, or any other amounts of money paid to or by you within the last three years.
31. All documents regarding wills, estates, gas and oil rights, property, or trusts to which you have an interest, or to which you are a present or future beneficiary.
32. All documents that relate to or show in any way, the establishment of trust funds or any accounts in the names of your children or other relatives in the past five years.
33. All documents that refer in any way, directly or indirectly, to any outstanding contracts for which you are entitled to receive a commission and/or on which you claim a right to receive a commission, whether a partial commission or complete commission.
34. All documents that constitute or refer in any way, directly or indirectly, to any notes receivable held by you or in which you claim an interest.
35. All documents that refer in any way, directly or indirectly, to any funds potentially payable to you or in which you claim an interest, that are not otherwise requested in these requests for production
36. All documents containing communications with any employee, agent, attorney, or member of the Church of Scientology or its affiliated organizations for the past three years.