

IN THE COURT OF THE SIXTH JUDICIAL CIRCUIT
IN AND FOR PINELLAS COUNTY, FLORIDA
CIVIL DIVISION

DELL LIEBREICH, as Personal
Representative of the
ESTATE OF LISA McPHERSON,

Plaintiff,

CASE NO. 00-5682-CI-11

vs.

CHURCH OF SCIENTOLOGY FLAG
SERVICE ORGANIZATION, JANIS
JOHNSON, ALAIN KARTUZINSKI
and DAVID HOUGHTON, D.D.S.,

Defendants.

Date 8/1/01 Time 2:25 pm
Name _____
Relationship _____
Peter B. Thornburgh
CPS 47-5172226

SUBPOENA DUCES TECUM

THE STATE OF FLORIDA:

TO: Lisa McPherson Trust, Inc.

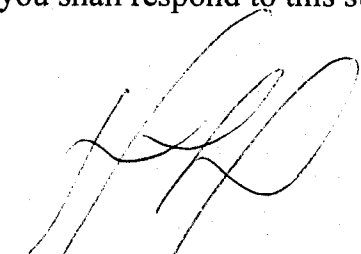
YOU ARE COMMANDED to appear at Johnson, Blakely, Pope, Bokor, Ruppel & Burns, P.A., 911 Chestnut Street, Clearwater, Florida 33756, (727) 461-1818, for testimony and for the production of documents on August 15, 2001, at 1:00 p.m., and to have with you at that time and place the documents identified in Exhibit A, attached hereto.

It is the intent of this subpoena that each and every document and thing in your care, custody, or control, or available to you, no matter how insignificant that item might appear to the party to whom this subpoena is directed, be produced. This subpoena encompasses all documents and things, regardless of how old, including anything that might be on microfilm/microfiche or kept at another location.

TO COMPLY WITH THIS SUBPOENA, YOU ARE TO PRODUCE EACH AND EVERY DOCUMENT OR THING WHICH HAS EVER BEEN A PART OF

YOUR FILES. If any document or thing is not produced, you are to identify that document or thing by date, title, author, and recipient; and identify the person, pursuant to whose instructions the documents or things were not produced, by name, address, and employer. If you fail to appear as specified, you may be in contempt of Court. You are subpoenaed by the attorneys whose names appear on this subpoena and unless excused from the subpoena by the attorneys or the Court, you shall respond to this subpoena as directed.

Dated: August 1, 2001



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Attorneys for Defendant
Church of Scientology Flag Service
Organization

EXHIBIT A

DEFINITIONS

The following definitions apply to the list of documents to be produced:

1. "Document" means every writing or record of every type and description (including those stored electronically or on a computer) that is or has been in your possession, control or custody or of which you have knowledge, including but not limited to, correspondence, memoranda, tapes, stenographic or handwritten notes, computerized or electronic documents regardless of their format, studies, publications, books, pamphlets, pictures, drawings and photographs, films, microfilms, voice recordings, video recordings, maps, reports, surveys, minutes or statistical computations.
2. "Concerning" means relating to, referring to, describing, evidencing or constituting.

LIST OF DOCUMENTS TO BE PRODUCED

irrelevant
Beyond scope
overly broad
privileged
NONE

1. Copies of all letters, e-mails, forms, affidavits, declarations, statements or any other documents concerning communication with any government agency with respect to any witness or family member of any witness listed on any parties' witness lists (attached) and/or any individual who has knowledge of the facts concerning the *Estate of Lisa McPherson v. Church of Scientology Flag Service Organization, et al.*

irrelevant
B/S
P
NO

2. All correspondence with any current or former Scientologist, or the parent or guardian of any current or former Scientologist.

Same as #1

3. Any and all forms or questionnaires used by any employee, member or agent of the Lisa McPherson Trust used for compiling information or complaints on any

witnesses or family members of any witnesses listed on defendants' witness list and/or any individual who has knowledge of the facts concerning the *Estate of Lisa McPherson v. Church of Scientology Flag Service Organization, et al.*

4. Any leaflets, fliers, e-mails, web pages or any other promotional material used by the Lisa McPherson Trust to solicit complaints or otherwise obtain information for complaints on any witnesses or family members of any witnesses listed on defendants' witness list and/or any individual who has knowledge of the facts concerning the *Estate of Lisa McPherson v. Church of Scientology Flag Service Organization, et al.*

5. Any and all documents concerning the statement from the Lisa McPherson Trust announcement that it has "documented cases in which Scientology has committed exactly the crimes that the French have named – fraud, abuse of confidence, the illegal practice of medicine, wrongful advertising and sexual abuse, as well as many others."

6. Any and all documents concerning communications about or with Marcus Quirino, Astra Woodcraft, Lawrence Woodcraft, Zoe Woodcraft, Maria Pia Gardini.

7. All records reflecting payments of funds for any purpose, to Stacy Brooks, and Jesse Prince not previously provided to defendants, including payroll records.

8. All records reflecting payments to counsel for the criminal defense of Jesse Prince.

9. All documents you have received concerning the case of *Liebreich v. Church of Scientology Flag Service Organization, et al.*

10. All documents concerning any complaints to any government agency or entity against defendant Church of Scientology Flag Service Organization and/or any of its

staff.

Same #2

11. All videos, letters and any other type of communication and material provided to any government agency, entity or employee, regarding the defendant Church of Scientology Flag Service Organization and/or any of its staff.

Beyond scope

12. Records reflecting any and all payments received from Robert Minton for operating expenses and debts.

13. Records reflecting payments made to and funds transferred to Robert Minton for any purpose.

Same as #1

14. All records of counseling conducted by LMT staff with members or former members of the Scientology religion whether classified as counseling, exit counseling (as described in the articles of incorporation of the LMT and other public statements by LMT) or anything else.

What does LMT do?
Beyond the scope - privileged