

727 443 3840 p.3

**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.

SUBPOENA DUCES TECUM **RECORDS ONLY
**IF REQUESTED RECORDS ARE MAILED IN PRIOR
TO DEPOSITION DATE, YOU NEED NOT APPEAR****

THE STATE OF FLORIDA:

TO: Bank of America

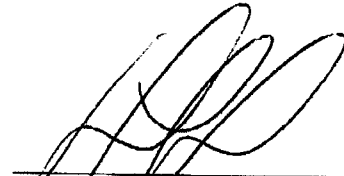
YOU ARE COMMANDED to appear at Johnson, Blakely, Pope, Bokor, Ruppel & Burns, P.A., 911 Chestnut Street, Clearwater, Florida 33756, (727) 461-1818, for testimony and for the production of documents on September 7, 2001, at 9:30 a.m., and to have with you at that time and place the documents identified 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.

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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 17, 2001



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Attorneys for Defendant
Church of Scientology Flag Service
Organization

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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

1. All documents from the Bank of America comprising the records relating to any account of the Lisa McPherson Trust, Inc., 33 North Fort Harrison Ave., Clearwater, Florida, 33755. This request is intended to include, but is not limited to, all records of wire transfers, intra-bank transfers, deposits, summaries, registers, statements, canceled checks and correspondence.
2. All documents from the records of Nations Bank comprising the records relating to any account of the Lisa McPherson Trust, Inc., 33 North Fort Harrison Ave., Clearwater, Florida, 33755. This request is intended to include, but is not limited to, all records of wire transfers, intra-bank transfers, deposits, summaries, registers, statements, canceled checks and correspondence.

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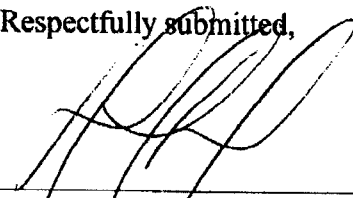
AND RELATED COUNTERCLAIM.

NOTICE OF PRODUCTION WITHOUT DEPOSITION

YOU ARE NOTIFIED that after 10 days from the date of service of this notice, if service is by delivery, and if no objection is received, the undersigned will issue the attached subpoena directed to Bank of America, who is not a party and whose address is 600 Cleveland St., Clearwater, Florida, 33755, to produce the items listed at the time and place specified in the subpoena.

Dated: August 17, 2001

Respectfully submitted,



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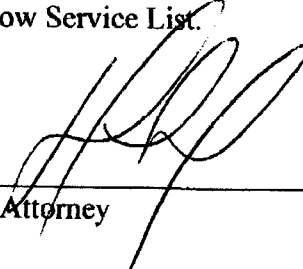
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Attorneys for Defendant
Church of Scientology Flag Service
Organization

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I have caused the foregoing **NOTICE OF PRODUCTION WITHOUT DEPOSITION** to be served on this 17th day of August, 2001, via Telefax & U.S. Mail, to the below Service List.



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