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FILED
MAR 12 2013
SUPERIOR COURT
BETTY J. GOULD
THURSTON COUNTY CLERK

SUPERIOR COURT OF THE STATE OF WASHINGTON
FOR THURSTON COUNTY

JZK, Inc., a Washington corporation,

Plaintiff,

vs.

VIRGINA COVERDALE; JOHN DOES 1-20 AND
JANE DOES 1-20, also known as Enlighten Me
Free,

Defendants.

NO. 12-2-02241-8

SUBPOENA DUCES TACUM

ASSIGNED TO THE HONORABLE GARY R.
TABOR

TO: Cox Subpoena Compliance Office
Cox Communications Inc.
1400 Lake Hearn Dr.
Atlanta GA 30319-1464
Phone: 404-269-0100
FAX: 404-269-1898

YOU ARE COMMANDED to appear in the Superior Court of the State of Washington at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

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

Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who

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[Cox Subpoena.docx]

LAW OFFICES
GORDON THOMAS HONEYWELL LLP
1201 PACIFIC AVENUE, SUITE 2100
POST OFFICE BOX 1157
TACOMA, WASHINGTON 98401-1157
(253) 620-6500 - FACSIMILE (253) 620-6565

1 consent to testify on its behalf, and may set forth, for each person designated, the
2 matters on which the person will testify. CR 30(b)(6).

3 PLACE OF DEPOSITION

DATE AND TIME

4 YOU ARE COMMANDED to produce and permit inspection and copying of the following
5 documents or tangible things at the place, date, and time specified below:

6 Produce the following for each IP Address OR phone number listed below:

7 INTERNET PROTOCOL ("I.P.") ADDRESS LOG RECORDS for Screen Names, Authors, IP
8 Addresses, Log Records, Telephone Numbers, Addresses, Names Of
9 Subscriber/Registrants, Addresses , email addresses associated with:

10 a. 70.189.180.204

11 b. 70.173.212.147

12 Inasmuch as it is possible, please produce the following information for each the above
13 service/s including but is not limited to:

- 14 1. Date account was established
- 15 2. Name of users that established the account, and are current owners or
16 billpayers for the account.
- 17 3. Address, phone numbers of users that established the account, and are current
18 owners or billpayers for the account.
- 19 4. Additional email addresses, phone numbers, physical addresses associated
20 with the account.
- 21 5. Media Access Control address (MAC address) for each connection/session.
- 22 6. Type of account associated with the IP address, i.e. Dynamic or Static IP

23 Please provide a detailed record of IP address that has been allocated to the above
24 user/customer prior and up to the date of receipt of this request, together with the
25 precise date and time that such IP addresses changed.

26 If this request is descriptively deficient in any way I would ask that you use your best
judgment to discern my intent and preserve what I have requested and any additional

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1 information that will help us identify the individual that utilized or accessed the services
2 described above. Furthermore, if you require any clarifying language in the request I
would ask that you contact us at your earliest convenience.

3 In the interests of expedience you are authorized to communicate directly with Mr. Bruce
4 C. Anderson who is assisting me with litigation support and forensic investigative tasks;
his number is (813) 333-7346, before mailing the original to:

6 PLACE GORDON THOMAS HONEYWELL LLP 7 1201 Pacific Avenue, Suite 2100 8 Tacoma, WA 98402	DATE AND TIME April 10, 2013
---	---------------------------------

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

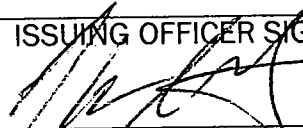
10 PREMISES	DATE AND TIME
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13
14 SUPERIOR COURT OF THE STATE OF WASHINGTON FOR THURSTON COUNTY

15 Presented by Reuben Schutz, WSBA No. 44767

16 SIGNED IN OPEN COURT ON March 12, 2013
17 GARY R. TABOR

18 Honorable Court Commissioner Judge

20 ISSUING OFFICER SIGNATURE AND TITLE  WSBA No. 36156 21 Attorney for Plaintiff	DATE 3/8/2013
22 ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER 23 Reuben Schutz 24 Andrea McNeely, WSBA No. 36156 GORDON THOMAS HONEYWELL LLP 25 1201 Pacific Avenue, Suite 2100 Tacoma, WA 98402	DATE

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1 (253) 620-6500
2 (206) 620-6565 FACSIMILE

3
4 ATTORNEYS OF RECORD

5 Andrea McNeely, Attorney for Plaintiff, WSBA No. 36156
6 GORDON THOMAS HONEYWELL LLP
7 1201 Pacific Avenue, Suite 2100
8 Tacoma, WA 98402
9 (253) 620-6500
10 (206) 620-6565 FACSIMILE

11 Defendant, Not Represented by Counsel:
12 Virginia Coverdale
13 813 Meridian Road, S.E.
14 Olympia, WA 98513-8917
15 (360)-438-2265
16 coverdale@qleap.com

17 SUPERIOR COURT OF GEORGIA DEKALB COUNTY
18 (Pursuant to O.C.G.A. § 24-13-112)

19 Date Issued:

20 _____
21 (type or print name)

22 _____
23 (signature of person issuing subpoena)

24 _____
25 (title)

26 PROOF OF SERVICE

DATE SERVED	PLACE
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

SUBPOENA DUCES TACUM - 4 of 6

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DECLARATION OF SERVER

CR 45, Sections (c) & (d)

(c) Protection of Persons Subject to Subpoenas

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney's fee.

(2) (A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, within 14 days after service of subpoena or before the time specified for compliance if such time is less than 14 days after service, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued. If objection has been made, the party serving the subpoena may, upon notice to the person commanded to produce and all other parties, move at any time for an order to compel the production. Such an order to compel production shall protect any person who is not a party or an officer of a party from significant expense resulting from the inspection and copying commanded.

(3) (A) On timely motion, the court by which a subpoena was issued shall quash or modify the subpoena if it:

(i) fails to allow reasonable time for compliance;

(ii) fails to comply with RCW 5.56.010 or subsection (e)(2) of this rule;

(iii) requires disclosure of privileged or other protected matter and no exception or waiver applies;
or

(iv) subjects a person to undue burden, provided that, the court may condition denial of the motion upon a requirement that the subpoenaing party advance the reasonable cost of producing the books, papers, documents, or tangible things.

(B) If a subpoena

(i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or.

(ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may, to protect a person subject to or affected by the subpoena, quash or modify the subpoena or, if the party in whose behalf the subpoena is issued shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship and assures that the person to whom the subpoena is addressed will be reasonably compensated, the court may order appearance or production only upon specified conditions.

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1 (d) Duties in Responding to Subpoena.

2 (1) A person responding to a subpoena to produce documents shall produce them as they are kept in the
3 usual course of business or shall organize and label them to correspond with the categories in the demand.

4 (2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to
5 protection as trial preparation materials, the claim shall be made expressly and shall be supported by a
6 description of the nature of the documents, communications, or things not produced that is sufficient to
7 enable the demanding party to contest the claim.
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SUBPOENA DUCES TACUM - 6 of 6

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Attachment

Attorney of Record for Plaintiff JZK, Inc.:

Andrea McNeely, Attorney for Plaintiff, WSBA No. 36156

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Defendant, Not Represented by Counsel:

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Olympia, WA 98513-8917

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coverdale@qleap.com