

IN THE 82nd DISTRICT COURT
ROBERTSON COUNTY, TEXAS

In the Interest of

RICHARD KEITH MOORE,

A Child

Cause No. 07-05-17827-CV

SUBPOENA DUCES TECUM FOR ROBERT M. STEM

THE STATE OF TEXAS

Issued on November 13, 2013

WITNESS: Robert M. Stem
P.O. Box 75
Marlin, Texas 76661-0075

TO ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN TEXAS RULE OF CIVIL PROCEDURE 176.

YOU ARE HEREBY COMMANDED TO SUMMON Robert M. Stem, who may be served at the Robertson County Courthouse, District Courtroom, Franklin, Texas 77856 to appear at 404-B East 27th Street, Bryan, Texas 77803 on January 15, 2014 at 10:30 a.m. to give testimony in the above-entitled and numbered cause at a deposition and remain in attendance from day to day until lawfully discharged.

Robert M. Stem is further commanded to produce the following documents and things for inspection and copying at 1095 Meadow Hill Drive, Lavon, Texas 75166 not later than December 20, 2013:

DOCUMENTS TO BE PRODUCED

- (1) All documents (electronic or otherwise) that you have produced pursuant to a subpoena (including a grand jury subpoena) since January 1, 2005. Produce a copy of the subpoena or discovery request as well.
- (2) All billing statements, retainer agreements, letters of retention, records of payment, or other records reflecting or setting forth an attorney-client relationship between you and any lawyer or law firm who/which practiced in your court.
- (3) Produce copies of all documents reflecting any business or financial transactions between you and any lawyers (including prosecutors such as John Paschall) or law firms who practiced in

your court, or your relatives of the first degree of consanguinity, since January 1, 2005. The term “financial transactions” should be construed to include gifts of any sort, whether cash, personal property, or real property. This demand includes, but is not limited to, business or financial transactions between companies, firms, or partnerships owned by you or the other or law firm, as well as business or financial transactions between you or your respective spouses or relatives of the first degree of consanguinity, as well as any companies, firms, or partnerships owned by them. This request includes, for example, income tax returns that reflect any gifts or income that you received from the aforesaid business or financial relationships.

(4) Produce copies of all documents reflecting any business relationships between you and any lawyer (including prosecutors such as John Paschall) or law firms who practiced in your court, or your relatives of the first degree of consanguinity, since January 1, 2005. The term “business relationships” should be construed to include any jointly owned enterprises, businesses, corporations, companies, or bank accounts, whether domestic or offshore. This request includes business relationships between companies owned by you (or the other lawyer or law firm), or your relatives of the first degree of consanguinity. This request further includes income tax records that reflect any business relationships described above.

(5) Produce copies of all communications since January 1, 2005 between you and any lawyer or law firm that practices in your court that were not simultaneously provided to opposing counsel.

(6) Produce copies of all communications or documents exchanged with the State Commission on Judicial Conduct or any of its officers, agents, appointees, employees or components concerning the case listed above or Richard Keith Moore, Madeline Moore, or Brian Moore.

(7) Produce copies of all communications or documents exchanged with any third party (*e.g.*, any judge, lawyer, government agency, or government official) concerning the case listed above or Richard Keith Moore, Madeline Moore, or Brian Moore.

(8) Produce copies of all communications or documents exchanged with any judge, lawyer, government agency, government official or other person concerning Ty Clevenger or *Roy E. Erwin, et al. v. Bryan F. Russ, Jr., et al.*, Case No. W09-CA-127 (W.D. Tex.) and Case No. 4:09-cv-01894 (S.D. Tex.), excepting those communications or documents that were simultaneously provided to Ty Clevenger. This request includes any communications with Judge Walter S. Smith, Jr.

This subpoena was issued at the request of Respondents Madeline Moore and Brian Moore, whose attorney of record is

Ty Clevenger
State Bar of Texas No. 24034380
1095 Meadow Hill Drive
Lavon, Texas 75166
(979) 985-5289
(979) 530-9523 (fax)

Rule 176.8(a) Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both.

Issued by:

Ty Clevenger
1095 Meadow Hill Drive
Lavon, Texas 75166
(979) 985-5289
(979) 530-9523 (fax)
tyclevenger@yahoo.com

ATTORNEY FOR MADELINE AND
BRIAN MOORE

SUBPOENA RETURN

Came to hand the _____ day of _____, 20 _____, at _____
o'clock _____.M., and executed the _____ day of _____,
20 _____, at _____ o'clock _____. M., by delivering to the within named
_____ in
person at _____ in
_____ County, Texas, a true copy of this Subpoena, and tendering said witness
the sum of \$ _____.

By Deputy:

Sheriff/Constable

County, Texas

OR

By:

Person who is not a party to the suit, and is not less than 18 years of age.