

CHESTERFIELD CIRCUIT COURT
9500 Courthouse Road, 2nd Floor
Chesterfield, VA 23832

J.W.C., C.R.B., S.M.O., E.S.D., T.W.B., C.M.H., J.L.S. (by and through his Next Friend and Mother, J.S.), J.S., Individually,
T.L.S. (by and through his Next Friend and Mother, M.S.), and M.S., Individually
v.

Immanuel Baptist Church, Southern Baptist Convention, Baptist General Association of Virginia, Petersburg Baptist Association, Alvin "Ted" Clark, Pastor Fred K. Adkins, Jr., and Jeffrey Dale Clark

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon:

Oak Hall
1877 Old Hanover Road
Sandston, VA 23111

TO the person summoned: You are commanded to make available the following documents and tangible things designated and described in the attached Exhibit A.

Send Records to: **Kevin Biniazan, c/o Breit Cantor Grana Buckner, PLLC, 600 22nd Street, Suite 402, Virginia Beach, Virginia 23451, on or before January 2, 2019 at 10:00 a.m.**

NOTICE TO PROVIDERS:

A COPY OF THIS SUBPOENA *DUCES TECUM* HAS BEEN PROVIDED TO DEFENDANT OR DEFENDANT'S COUNSEL. YOU OR THE DEFENDANT HAS THE RIGHT TO FILE A MOTION TO QUASH (OBJECT TO) THE ATTACHED SUBPOENA. IF YOU ELECT TO FILE A MOTION TO QUASH, YOU MUST FILE THE MOTION WITHIN 15 DAYS OF THE DATE OF THIS SUBPOENA.

YOU MUST NOT RESOND TO THIS SUBPOENA UNTIL YOU HAVE RECEIVED WRITTEN CERTIFICATION FROM THE PARTY ON WHOSE BEHALF THE SUBPOENA WAS ISSUED THAT THE TIME FOR FILING A MOTION TO QUASH HAS ELAPSED AND THAT:

- (1) NO MOTION TO QUASH WAS FILED; OR**
- (2) ANY MOTION TO QUASH HAS BEEN RESOLVED BY THE COURT OR THE ADMINISTRATIVE AGENCY AND THE DISCLOSURES SOUGHT ARE CONSISTENT WITH SUCH RESOLUTION.**
- (3) IF YOU RECEIVE NOTICE THAT YOUR PATIENT HAS FILED A MOTION TO QUASH THIS SUBPOENA, OR IF YOU FILE A MOTION TO QUASH THIS SUBPOENA, YOU MUST SEND THE RECORD ONLY TO THE CLERK FO THE COURT OR ADMINISTRATIVE AGENCY THAT ISSUED THE SUBPOENA OR IN WHICH THE ACTION IS PENDING AS SHOWN ON THE SUBPOENA USING THE FOLLOWING PROCEDURE:**
- (4) PLACE THE RECORDS IN A SEALED ENVELOPE AND ATTACH TO THE SEALED ENVELOPE A COVER LETTER TO THE CLERK OF COURT OR ADMINISTRATIVE AGENCY WHICH STATES THAT CONFIDENTIAL HEALTH CARE RECORDS ARE ENCLOSED AND ARE TO BE HELD UNDER SEAL PENDING A RULING ON THE MOTION TO QUASH THE SUBPOENA. THE SEALED ENVELOPE AND COVER LETTER SHALL BE PLACED IN AN OUTER ENVELOPE OR PACKAGE FOR TRANSMITTAL TO THE COURT OR ADMINISTRATIVE AGENCY.**

This subpoena *duces tecum* is issued by the attorney for or on behalf of the Plaintiff.

Name of Attorney: Kevin Biniazan
Office Address: Breit Cantor Grana Buckner, PLLC
600 22nd Street
Suite 402
Virginia Beach, VA 23451
Date Issued: 12/11/2019

Virginia State Bar No. 92109
Telephone: (757) 622-6000
Facsimile: (757) 670-3939

Signature of Attorney

RECEIVED & FILED
CHESTERFIELD CIRCUIT COURT
2019 DEC 16 AM 9:44
TESTER
WENDY S. HUGHES
CLERK OF COURT
JUDITH ANN O'DONNAY CLERK

NOTICE TO RECIPIENT: See page 2 for further information.

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

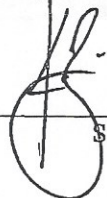
This SUBPOENA DUCES TECUM is being served by a private process service who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME:	
ADDRESS:.....	
.....	
PERSONAL SERVICE	Telephone No.:.....
.....	
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode or party named above after giving information of its purport. List name, age recipient, and relation of recipient to party named above;	
.....	
.....	
<input type="checkbox"/> Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> Not found	
.....	
....., Sheriff	
.....	by....., Deputy Sheriff
DATE	

CERTIFICATE OF COUNSEL

I, Kevin Biniazan, counsel for the Plaintiff, hereby certify that a copy for the foregoing subpoena *duces tecum* was sent via U.S. First Class Mail, postage prepaid to all counsel of record this 11th day of December, 2019.



Signature of Attorney

EXHIBIT A

Please provide the following documents and things:

1. All letters, emails, and other records of communication (written or audio recordings) from the Southern Baptist Convention referencing the Cooperative Program and/or your cooperation with the Southern Baptist Convention;
2. All letters, emails, and other documents from the Southern Baptist Convention referencing policies, procedures, or practices;
3. All letters, emails, and other records of communication (written or audio recordings) sent to the Southern Baptist Convention or received from the Southern Baptist Convention related to employment, positions, and/or jobs (including Pastor, Ministry Director, Administrative roles, and Youth & Children Pastors/Directors) at your church and/or in Virginia;
4. All documents and materials received from the Southern Baptist Convention related to sexual abuse;
5. All documents and letters referencing the Southern Baptist Convention's Section 501(c)(3) group exemption with the Internal Revenue Service or Internal Revenue Code;
6. A copy of the Southern Baptist Convention's Section 501(c)(3) Group Exemption Letter;
7. All records of financial contributions to the Southern Baptist Convention including the Southern Baptist Convention's Cooperative Program;
8. A copy of all Remittance Forms sent to the Baptist General Association of Virginia;
9. A copy of all documents sent to the Baptist General Association of Virginia

reflecting financial contributions to the Cooperative Program and/or the Southern Baptist Convention;

10. A copy of all documents sent to the Southern Baptist Conservatives of Virginia reflecting financial contributions to the Cooperative Program and/or Southern Baptist Convention;

11. Any and all documents or records reflecting attendance at the Southern Baptist Convention meetings, conferences, and conventions;

12. All documents related to your status as a Member and/or Cooperating Church with the Southern Baptist Convention, including applications, paperwork, completion of guidelines, and practice requirements.

13. All documents related to your credentialing process to be identified as a Cooperating Church with the Southern Baptist Convention;