

CAUSE NO. 323-112330-19

TINSLEE BREAUN LEWIS, A MINOR AND MOTHER, TRINITY LEWIS, ON HER BEHALF,	§	IN THE DISTRICT COURT
	§	
	§	
Plaintiffs,	§	
	§	
v.	§	TARRANT COUNTY, TEXAS
	§	
COOK CHILDREN'S MEDICAL CENTER,	§	
	§	
Defendant.	§	323 RD JUDICIAL DISTRICT

SUBPOENA DUCES TECUM

To: True Texas Project c/o James E. Guinn, 2408 Texas Dr., Irving, TX 75062.

Pursuant to Rule 205.3 of the Texas Rules of Civil Procedure, Defendant Cook Children's Medical Center hereby serves this subpoena *duces tecum* and requests that True Texas Project produce the documents requested below for inspection and copying no later than 3:00 p.m. on November 27, 2019, to the offices of Winston & Strawn, LLP, 2121 N. Pearl St., Ste. 900, Dallas, TX 75201.

INSTRUCTIONS

The following and instructions shall apply to these document requests:

1. All documents responsive to the Requests shall be produced in the same form and in the same order in which they are kept in the usual course of business.
2. In responding to the Requests, you are required to produce all documents, including attachments, copies, and enclosures, and tangible things in your possession, custody, or control or the possession, custody, or control of your attorneys, officers, directors, agents, employees, accountants, consultants, investigators, surveyors, representatives, affiliates, or any other persons or entities directly or indirectly employed by you or your attorneys or anyone else subject to your control.
3. If you choose to object to any of the Requests, you shall state with specificity the grounds for your objection and, because no part of any request shall be left without a response

merely because an objection is interposed to another part of the request, you shall produce all documents and tangible things to the extent the request is not objectionable.

4. If any document cannot be produced in full, produce it to the extent possible, specifying the reasons for your inability to produce the remainder and stating whatever information, knowledge, or belief you do have concerning the unproduced portion.

5. If any of the information or documents responsive to any of the Requests are withheld upon any claim of privilege or immunity from production, provide, concurrently with your responses to the Requests, for each document withheld, the following information:

- (a) the type of document (*e.g.*, letter, memorandum, email, account statement, etc.);
- (b) the date the document was prepared and the date of any meeting or conversation reflected or referred to in the document;
- (c) the name of each author, co-author, and preparer of the document and the name of each recipient or addressee, including each recipient of a copy of the document;
- (d) if the document reflected or referred to a meeting or conversation, the name of each person who was present at or was a party to the meeting or conversation;
- (e) the subject matter of the information contained in the document;
- (f) the nature of the privilege or immunity asserted; and
- (g) a brief explanation of why the document is believed to be privileged or immune from production.

6. All definitions and rules of construction contained in the Texas Rules of Evidence and the Texas Rules of Civil Procedure are incorporated herein by reference.

DOCUMENTS TO BE PRODUCED

You are commanded to produce and permit inspection and copying of the following documents, electronically stored information, or tangible things:

Request No. 1: All communications between you and Judge Alex Kim from 2017 to present, including communications regarding the application for temporary restraining order in this case, communications regarding the assignment of Judge Kim's court to this case, and communications regarding Tinslee Lewis.

Request No. 2: Any recordings of meetings or other communications between you and Judge Alex Kim from 2017 to present.

Request No. 3: All communications between you and Tony Tinderholt related to this case, including communications regarding Judge Alex Kim's availability to hear the application for temporary restraining order in this case and communications regarding the assignment of Judge Kim's court to this case.

Request No. 4: All communications between you and Tan Parker related to this case, including communications regarding Judge Alex Kim's availability to hear the application for temporary restraining order in this case and communications regarding the assignment of Judge Kim's court to this case.

Request No. 5: All communications between you and Joe Nixon related to this case, including communications regarding Judge Alex Kim's availability to hear the application for temporary restraining order in this case and communications regarding the assignment of Judge Kim's court to this case.

Request No. 6: All communications between you and Texas Right to Life related to this case, including communications regarding Judge Alex Kim's availability to hear the application for temporary restraining order in this case and communications regarding the assignment of Judge Kim's court to this case.

Request No. 7: All documents and communications related to Judge Alex Kim's attendance at True Texas Project's event on November 11, 2019.

Request No. 8: Any video or other recording of True Texas Project's event on November 11, 2019.

Request No. 9: All communications between you and any other person related to Judge Alex Kim's availability to hear the application for temporary restraining order in this case.

Request No. 10: All communications between you and any other person related to the assignment of this case to Judge Alex Kim's court.

Request No. 11: All documents and communications related to any endorsement of Judge Alex Kim's judicial campaign by True Texas Project.

Request No. 12: All documents and communications related to any contributions True Texas Project made to Judge Alex Kim's judicial campaign.

Dated: November 25, 2019

Respectfully submitted,



By: _____

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ATTORNEYS FOR DEFENDANT

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the above and foregoing document has been served on Plaintiff's counsels via their emails as noted below on November 25, 2019

Joseph M. Nixon, joe@nixonlawtx.com

Emily Cook, emily@emilycook.org

By: /s/ Geoffrey S. Harper

Geoffrey S. Harper