UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Three Angels Broadcasting Network, Inc., an Illinois non-profit corporation, and Danny Lee Shelton, individually,))) Case No.: 0:08-mc-7 RHK/AJB
Plaintiffs, v.)))
Gailon Arthur Joy and Robert Pickle,)))
Defendants.)))

DEFENDANT ROBERT PICKLE'S OPPOSITION TO PLAINTIFF DANNY SHELTON'S MOTIONS TO QUASH SUBPOENA DUCES TECUM OR, IN THE ALTERNATIVE, FOR PROTECTIVE ORDER, AND TO STAY AND REMIT ENFORCEMENT OF SUBPOENA DUCES TECUM OR, IN THE ALTERNATIVE, TO APPOINT A SPECIAL MASTER

Defendant Pickle opposes Plaintiff Shelton's motions which seek to interfere with a thirdparty subpoena, and respectfully requests the Court to deny these motions.

- 1. Plaintiff Shelton has no standing to bring his motions before this Court since he does not own and has no claim of privilege in the bank records in question.
- 2. Given allegations of document fraud and document destruction leveled against Plaintiff Shelton, and given the discrepancies in his own sworn statements, the Defendants must be free to challenge whatever documents Plaintiff Shelton eventually produces (though he has thus far refused to produce one single document).
- 3. The third-party subpoena in question is not burdensome to MidCountry Bank, which charges significant fees to obtain the business records it owns.

freely available provide a basis for seeking bank records back to 1998 and concerning Plaintiff

Shelton's personal publishing ventures.

5. The District of Massachusetts has already decided not to impound the underlying

The third-party subpoena is not overbroad, for public records and publications

case.

4.

6. The Plaintiffs were instructed by the court on December 14, 2007, that any

proposed protective order would have to be narrowly tailored, which their proposed Protective

Order definitely is not.

7. Local Rules for the District of Massachusetts disallow blanket orders of

impoundment such as the Plaintiffs' proposed Protective Order.

8. The Honorable Judge Dennis Saylor already stated on December 14, 2007, that

there would be no stay of discovery pending a hearing on the Plaintiffs' proposed Protective

Order.

9. In regards to a special master, Plaintiff Shelton seeks to use the District of

Minnesota to force the District of Massachusetts to do what it has thus far seen no need to do,

and has not been asked by Plaintiff Shelton's counsel to do.

WHEREFORE, Defendant Pickle prays the Court to deny Plaintiff Shelton's Motion to

Quash or for Protective Order, and Plaintiff Shelton's Motion to Stay and Remit, or to Appount a

Special Master.

Respectfully submitted,

Dated: February 25, 2008

/s Robert Pickle, pro se

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