
UNITED STATES DISTRICT COURT

DISTRICT OF MINNESOTA

Three Angels Broadcasting Network, Inc.,
an Illinois non-profit corporation, and
Danny Lee Shelton, individually,

Case No. _____

Plaintiffs,

v.

Gailon Arthur Joy and Robert Pickle,

Defendants.

**NOTICE OF MOTIONS AND MOTIONS BY PLAINTIFF DANNY SHELTON
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**

TO: Defendant Robert Pickle, *pro se*, 1354 County Highway 21, Halstad, MN 56548

NOTICE OF MOTIONS

PLEASE TAKE NOTICE that on a day and time to be determined by the Court, the undersigned counsel for Plaintiff Danny Shelton will on his behalf bring a Motion to Quash Subpoena *Duces Tecum* or, in the Alternative, for Protective Order, and a Motion to Stay and Remit Enforcement of Subpoena *Duces Tecum* or, in the Alternative, to Appoint a Special Master.

MOTIONS

Pursuant to Federal Rules of Civil Procedure 26(c) and 45(c)(3), Plaintiff Danny Shelton moves for an Order quashing the subpoena served by Defendant Robert Pickle

upon MidCountry Bank or, in the alternative, for a protective order governing information produced by MidCountry Bank in response to said subpoena.

Further, pursuant to Federal Rules of Civil Procedure 26(c), 45(c)(3) and 53, Plaintiff Danny Shelton moves for an Order staying enforcement of the above-referenced subpoena and remitting the discovery dispute arising from said subpoena to the United States District Court for the District of Massachusetts or, in the alternative, appointing a special master from that Court.

These motions are based upon Plaintiff's Memorandum in Support of Motion to Quash Subpoena *Duces Tecum* or, in the Alternative, for Protective Order, and in Support of Motion to Stay and Remit Enforcement of Subpoena *Duces Tecum* or, in the Alternative, to Appoint a Special Master, and upon all affidavit(s) filed and served therewith.

Dated: February 6, 2008.

Respectfully Submitted,

**Attorneys for Plaintiffs Three Angels
Broadcasting Network, Inc. and Danny
Shelton**

**SIEGEL, BRILL, GREUPNER,
DUFFY & FOSTER, P.A.**

s/ Jerrie M. Hayes

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