

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MICHIGAN

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

Plaintiffs,

vs.

Case No.: 1:08-mc-03

Gailon Arthur Joy and Robert Pickle,

Defendants.

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Siegel, Brill, Greupner, Duffy & Foster,  
P.A.

Attorneys for Plaintiffs

By: Jerrie M. Hayes, Esq.

100 Washington Avenue South, Suite  
1300

Minneapolis, MN 55401

Tel: (612) 337-6100

Fax: (612) 339-6591

BIRINGER, HUTCHINSON, LILLIS,  
BAPPERT & ANGELL, P.C.

Attorneys for Remnant Publications, Inc.

By: Charles R. Bappert (P41647)

100 West Chicago Street

Coldwater, MI 49036-1897

Tel: (517) 279-9745 g\15003.6.doc

Fax: (517) 278-7844

Robert Pickle, *pro se*, Defendant

1354 County Highway 21

Halstad, MN 56548

Tel: (218) 456-2568

Fax: (206) 203-3751

Gailon Arthur Joy, *pro se*, Defendant

Box 1425

Sterling, MA 01564

Tel: (978) 422-3525

**RESPONSE TO  
DEFENDANTS' MOTION TO COMPEL  
REMNANT PUBLICATIONS**

**NOW COMES** Remnant Publications, Inc., by and through its attorneys, Biringer, Hutchinson, Lillis, Bappert & Angell, P.C., by Charles R. Bappert, and responds to Defendants' Motion to Compel as follows:

Remnant Publications, Inc., denies that the information sought by Defendants is relevant to the underlying lawsuit between Danny Lee Shelton, Three Angels Broadcasting Network, and defendants. Furthermore, Remnant Publications, Inc., asserts that defendants' methods of discovery are overbroad, burdensome, and seek confidential business and financial documents. In addition, defendants could obtain this information from more convenient sources – namely, the plaintiffs in the case. Finally, defendants are seeking discovery from Remnant Publications, Inc., a non-party to the lawsuit, in an effort to support allegations they made against the plaintiffs without any basis or knowledge for those allegations.

**WHEREFORE**, Remnant Publications, Inc., requests that this Court act as follows:

- A) Deny defendants' Motion to Compel and award Remnant Publications, Inc., reasonable expenses in responding to this motion pursuant to Fed. R. Civ. P. 37(a)(5)(B), or
- B) In the alternative, direct a protective order to be put in place to preserve the confidentiality of any documents obtained pursuant to Fed. R. Civ. P. 26(c), as this same motion is being put forth by plaintiffs in the United States District Court for the District of Massachusetts.

Respectfully submitted,

Dated: May 19, 2008

/s/ Charles R. Bappert  
Charles R. Bappert (P41647)  
Biringer, Hutchinson, Lillis,  
Bappert, & Angell, P.C.  
100 W. Chicago Street  
Coldwater, MI 49036-1897  
Tel: (517) 279-9745  
Fax: (517) 278-7844