

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
)	
) Plaintiffs,)	
v.)	
)	
Gailon Arthur Joy and Robert Pickle,)	
)	
) Defendants.)	
_____)	

AFFIDAVIT OF ROBERT PICKLE

NOW COMES Robert Pickle of Halstad Township, Norman County, Minnesota, who deposes and testifies to the following under pain and penalty of perjury:

1. Three Angels Broadcasting Network, Inc. (“3ABN”) and Danny Lee Shelton filed suit on April 6, 2007, in United States District Court for the District of Massachusetts, a suit captioned *Three Angels Broadcasting Network, Inc. and Danny Lee Shelton v. Gailon Arthur Joy and Robert Pickle* (No. 07-40098-FDS (D. Mass.)).

2. I caused a subpoena *duces tecum* dated December 12, 2007, to be issued and served upon MidCountry Bank, N.A. (“MidCountry”). This subpoena seeks the business records of a bank that are reasonably calculated to lead to the discovery of admissible evidence in the underlying suit. The bank records in question are only for accounts upon which Plaintiff Danny Lee Shelton is a signatory.

3. That subpoena was actually the second one served upon MidCountry Bank, as

acknowledged by Plaintiff Shelton in the documents filed with his Motion to Quash. The first one was issued by the District of Massachusetts on December 6, 2007, and the bank requested that the subpoena be reissued by the District of Minnesota.

4. MidCountry Bank has responded to the subpoenas by giving a list of 10 bank accounts that Danny Shelton has been a signatory of, and by giving invoices of what obtaining the requested records might cost. See Exhibits A–C.

FURTHER DEPONENT TESTIFIES NOT.

Signed and sealed this 19th day of February, 2008.

s/ Bob Pickle
Bob Pickle

Subscribed and sworn to me
this 19th day of February, 2008.

s/ Deanna Zimmerman
Notary Public

My commission expires Jan. 31, 2010