

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

PHIL BRYANT

PLAINTIFF

vs.

Civil Action No.:

23-238 JM

MARY MARGARET WHITE &
DEEP SOUTH TODAY d/b/a MISSISSIPPI TODAY

DEFENDANTS

SUBPOENA TO PRODUCE DOCUMENTS, MATERIALS OR TO PERMIT
INSPECTION OF A PREMISES IN A CIVIL ACTION

TO: **Brad Pigott**
775 North Congress Street
Jackson, MS 39202

[X] *Production*: **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or things within you possession, custody or control, and to permit Inspection and copying of the materials: **SEE EXHIBIT 1**

Place: McCraney, Montagnet, Quin & Noble, PLLC
602 Steed Road, Suite 200
Ridgeland, MS 39157

Date and Time: 30 Dates After Served
With This Subpoena
By 8/25/2023 at 5 p.m.

[] *Inspection of Premises*: **YOU ARE COMMANDED** to permit entry onto the premises designated below at the time, date, and location set forth below, so that the requesting party may inspect the premises.

Place:

Date and Time:

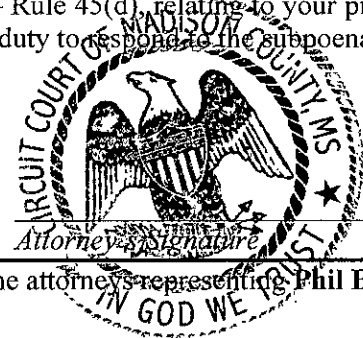
YOU SHALL NOT PRODUCE DOCUMENTS OR THINGS OR PERMIT INSPECTION UNTIL THIRTY DAYS AFTER YOU WERE SERVED WITH THIS SUBPOENA.

The following provisions of M.R.C.P. 45 are attached – Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e), relating to your duty to respond to the subpoena.

DATE:

CLERK OF COURT
Anita King Johnson
Signature of Clerk

OR



Attorney's Signature

The names, email addresses, and telephone number of the attorneys representing **Phil Bryant** who issued or requested this Subpoena are:

William M. Quin II, Esq. (MSB # 10834)
McCraney Montagnet Quin & Noble, PLLC
wquin@mmqnlaw.com
(601) 707-5725

W. Thomas McCraney III, Esq. (MSB #10171)
McCraney Montagnet Quin & Noble, PLLC
tmccraney@mmqnlaw.com
(601) 707-5725

Notice to the person who issues or requests this subpoena:

This subpoena must first be served upon each party pursuant to M.R.C.P. 5 before it is served on the person to whom it is directed. M.R.C.P. 45(a)(5)

EXHIBIT 1

DEFINITIONS

1. The word “person(s)” shall mean all individuals and entities, including sole proprietorships, associations, companies, partnerships, joint ventures, corporations, individuals, and other juridical entities.

2. “Communication” includes face-to-face oral discussion, telephonic discussion, written exchanges, e-mail, text messages, voice messages, and other similar electronic communications.

2. “Document” is used in its broadest sense and includes, but is not limited to, any printed, typewritten, handwritten, graphic or recorded matter of any type and description, however denominated and however and by whomever prepared, recorded, produced, reproduced, disseminated or made, including, but not limited to, the following: Any letter, telephone bill, calls, minutes, resolutions, telegrams, cables, teletypes, report, chart, affidavit, statement, accountants’ statement, financial statement, bank records, book of account, ledger, work sheet, balance sheet, information sheet, data sheet, log book, journal, list, book, manuscript, desk calendar, appointment book, diary, business records, personal records of employees, opinion, memorandum, summary or record or tape recording or transcript of any conversation or meeting, notes, notebooks, paper, photograph, audio or video tape, recording, microfilm, microfiche, study, contract, written agreement, check, receipt, invoice, bill, computer printout, communication, summary of interview, report and/or summary of investigations, and/or any other writing of whatever description, including computer tapes, computer cards, disk, diskettes, any information contained in any computer although not yet printed and any draft, carbon, photographic copy, preliminary take or version of any such material the contents of which differs in any respect from the original.

4. Something “relating to” or which “relates to” any given subject means anything that constitutes, contains, embodies, reflects, identifies, states, refers to, deals with, or is anyway pertinent to that subject.

5. “Mississippi Today” refers to Deep South Today d/b/a Mississippi Today.

REQUESTED DOCUMENTS AND COMMUNICATIONS

Please produce the following documents and communications consistent with Mississippi Rule of Civil Procedure 45:

1. All *documents* provided to or received from Anna Wolfe or any other *person* employed by or affiliated with *Mississippi Today*.
2. All *communications* sent to or received from Anna Wolfe or any other *person* employed by or affiliated with *Mississippi Today*.
3. All *documents related to* documents provided to or received from Anna Wolfe or any other *person* employed by or affiliated with *Mississippi Today*.
4. All *communications* with any *person* related to *documents* provided to or received from Anna Wolfe or any other *person* employed by or affiliated with *Mississippi Today*.