

THE STATE OF NEW HAMPSHIRE

MERRIMACK, SS.

SUPERIOR COURT

Case Number: 217-2023-CV-00285

Casella Waste Systems, Inc.

v.

Jon Swan

DEPOSITION SUBPOENA DUCES TECUM

TO: Jim Dannis
117 Mc Ginty Road
Dalton, NH 03598

You are required to appear before a Justice of the Peace and/or Notary Public from Avicore Reporting to give your deposition testimony at the offices of **Parnell, Michels & McKay, PLLC, 137 Main St, North Woodstock, New Hampshire on Monday, June 30, 2025 at 10:00 a.m.**, or as soon thereafter as called and to continue from day to day, to testify to your knowledge relating to the above captioned matter which is currently pending and will be tried in the Merrimack County Superior Court, State of New Hampshire.

You are required to bring with you and produce at the time aforesaid the documents listed on the attached **Schedule A** and made a part hereof by this reference.


IF YOU PRODUCE THE REQUESTED DOCUMENTS TO ORR & RENO, ATTN: BETH E. VENUTI, PARALEGAL, P.O. BOX 3550, CONCORD, NH 03302 ON OR BEFORE JUNE 26, 2025, YOU WILL NOT BE REQUIRED TO ATTEND THE DEPOSITION ON JUNE 30, 2025.


HEREOF FAIL NOT, as you will answer your default under the penalties prescribed by law.

Dated at Concord, New Hampshire, the 17th day of June, 2025.



Jeremy D. Eggleton, NH Bar #18170
Orr & Reno, P.A.
jeggleton@orr-reno.com
45 S. Main Street, Suite 400
P.O. Box 3550
Concord, N.H. 03302-3550
Phone: (603) 224-2381



Justice of the Peace/Notary Public
My Commission Expires: 

SCHEDULE A

REQUESTS FOR PRODUCTION OF DOCUMENTS

Definitions

1. "Document" means any recording of information in any hard-copy format whatsoever. This term includes information that is handwritten, typed, drawn, sketched, printed, recorded, or fixed in any medium by any physical or mechanical means whatsoever. This term specifically includes, but is not limited to, the following: letters, memoranda, correspondence, electronic mail, instant messages, voicemail, facsimiles, telegrams, diaries, address books, calendars, journals, task lists, appointment books, notes, notebooks, notes of meetings, minutes of meetings, pictures, photographs, drawings, diagrams, blue prints, architectural documents, engineering documents, designs, schematics, prints, books, manuals, texts, publications, white papers, business plans, advertising plans or materials, promotion plans or materials, marketing plans or materials, financial statements, tax returns, records, papers, invoices, accounts, statements, checks, drafts, written memorials of oral communications, and computer printouts. Every copy of a document that differs in any way from an analogous document is a separate and different version of the same document that should be produced. As used herein, the term "document" specifically includes "electronically stored information" as defined in these Definitions.

You are requested to produce all documents concerning the following:

1. Any and all emails or text messages exchanged with Rebecca Metcalf from May 1, 2023 to October 1, 2023.
2. Any and all emails or text messages exchanged with any other person using @casella.com or another casella domain as an email address from May 1, 2023 to October 1, 2023.
3. Any and all emails or text messages that mention the words: lawsuit, swan, save forest lake, NDA, gag, settlement, agreement, NCES, landfill, dismiss, and confidential, from May 1, 2023 to October 1, 2023.
4. Any and all internet communications (e.g., facebook posts, Instagram posts, chat room posts, etc.) that talk about Casella, Jon Swan, legal actions between them, settlement agreements between them, non-disclosure orders, gag orders, confidentiality).

PROOF OF SERVICE

On _____, 2025, I, the undersigned, being over the age of 18, served the within Subpoena Duces Tecum on Jim Dannis on behalf of the Defendant, Jon Swan.

I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: _____

Name:

Address for Service:

Jim Dannis
117 Mc Ginty Road
Dalton, NH 03598