

Cause No. 19-7298-367

ROBERT OBLON

vs.

JORDAN BROCK

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IN THE DISTRICT COURT OF

DENTON COUNTY, TEXAS

367TH JUDICIAL DISTRICT

**NOTICE OF INTENTION
TO TAKE DEPOSITION BY WRITTEN QUESTIONS**

TO: ALL PARTIES BY AND THROUGH THEIR ATTORNEY(S) OF RECORD AS PROVIDED IN THE ATTACHED SERVICE LIST.

You will take notice that twenty (20) days after the service hereof, with attached questions, a deposition by written questions will be asked of the witness:

**MARK WILLODSON-(Client Record Scope)
3000 N. ATLANTIC AVENUE, 6TH FLOOR, DAYTONA BEACH, FL 32118**

Such questions to be answered on or after *01/20/2020*, before a Notary Public at the instance of:

**Written Deposition Service, LLC
1755 Whittington Place, Suite 750
Dallas, TX 75234**

The deposition with attached questions may be used in evidence upon the trial of the above-styled and numbered cause pending in the above named court. Notice is further given that request is hereby made as authorized under Rule(s) 200 & 201(b), Texas Rules of Civil Procedure, to the officer taking this deposition to issue a Subpoena Duces Tecum and cause it to be served on the witness to produce any and all records as described on the attached questions and/or Exhibit(s) and any other such record in the possession, custody or control of the said witness, and every such record to which the witness may have access, and to turn all such records over to the officer authorized to take this deposition so that photographic reproductions of the same may be made and attached to said deposition.

Respectfully Submitted,

/s/Howard Klatsky

Howard Klatsky
SBA #: 00786024
Fee, Smith, Sharp & Vitullo
13155 Noel Road, Suite 1000
Dallas, TX 75240
972-934-9100; Fax 972-934-9200
hklatsky@feesmith.com

Attorney for: Plaintiff

CERTIFICATE OF SERVICE

I certify, as authorized agent for the attorney of record, Howard Klatsky that a true and exact copy of foregoing Notice of Intention to Take Deposition upon Written Questions was served to all attorneys of record in the above-styled and numbered matter, said service being effected in the following manner:

CERTIFIED MAIL/RETURN RECEIPT REQUESTED _____

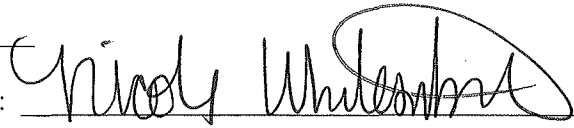
HAND DELIVERY _____

TELECOPY _____ ✓

OVERNIGHT/NEXT DAY DELIVERY VIA LONE STAR OR UPS _____

E-MAIL _____

DATED: 12/27/19

BY: 

SERVED TO ALL PARTIES LISTED BELOW:

Robert Oblon vs. Jordan Brock

ATTORNEYS OF RECORD

Andrew Speicher
Figari & Davenport, L.L.P.
Bank of America Plaza
901 Main Street, Suite 3400
Dallas, TX 75202
214-939-2000; Fax: 214-939-2090
Attorney For: Defendant

CAUSE NO: 19-7298-367

ROBERT OBLON

§ IN THE DISTRICT COURT OF

§

vs.

§

DENTON COUNTY, TEXAS

§

JORDAN BROCK

§

367TH JUDICIAL DISTRICT

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS:
MARK WILLODSON**

1. State your full name and occupation, address and telephone number.

ANSWER: (NAME) _____
(OCCUPATION) _____
(ADDRESS) _____
(CITY, STATE, ZIP) _____
(TELEPHONE #) _____

2. In response to the Subpoena Duces Tecum you received, have you produced **RECORDS AS NAMED IN THE ATTACHED EXHIBIT?**

ANSWER: _____

3. Are you able to identify these records as the originals or true and correct copies of the originals?

ANSWER: _____

4. Were these records made and kept in the regular course of your business?

ANSWER: _____

5. In the regular course of business of your practice, business, or institution, did the person who signed the records and/or reports either have personal knowledge of the entries shown on the records and/or reports, or obtain the information to make the entries from the sources who have such personal knowledge?

ANSWER: _____

6. Were such memoranda or documents then transmitted to your files and thereafter maintained under your care, supervision, direction, custody, control or access as custodian of this facility?

ANSWER: _____

7. Were the memoranda or documents that were transmitted to your files original entries on the part of the Custodian or other employee or member of the staff of this facility?

ANSWER: _____

8. Were the records or documents prepared at or about the time of the events and conditions they record?

ANSWER: _____

9. Were these records kept as described in the previous questions?

ANSWER: _____

10. Please examine copies of the original requested records. Have you produced records for attachment to this Deposition?

ANSWER: _____

11. Has anything been removed from or altered in the original records before making these copies?

ANSWER: _____

12. If you have answered the previous question yes, please state fully and precisely what alteration was made in the original records and attach copies of every document removed from the original records.

ANSWER: _____

13. In the event that no records can be found, are there document archives (i.e. microfiche) or document retention policies which explain their absence? If so, please identify who has knowledge of those archives or policies of the above named facility.

ANSWER: _____

14. Are you aware that it may be necessary to subpoena you or your employer to court at the time of trial if you have not provided all of the papers, notes, documents, records, general correspondence, or other tangible items of any kind pertaining to the above named individual to the Notary Public taking your deposition?

ANSWER: (circle one) YES/NO

I, _____ (Witness), do swear or affirm that my answers to the above questions are the truth, the whole truth and nothing but the truth, so help me God.

Witness

I, _____, A Notary Public, do hereby certify the above Witness was duly sworn and the non-stenographic recording of this Written Deposition is a true record of the Witness testimony.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, THIS ____ DAY OF _____, 20__.

SIGNATURE OF NOTARY PUBLIC IN AND FOR THE STATE OF FL

NAME OF NOTARY PUBLIC TYPED OR PRINTED
My Commission expires _____

EXHIBIT

Documents to be produced:

1. All communications (including all texts, emails, and other written communications) that Mark Willodson Sent to Jordan Brock that discuss and/or reference Robert Oblon between January 1, 2019 and the present date; and
2. All communications (including all texts, emails, and other written communications) that Mark Willodson received from Jordan Brock that discuss and/or reference Robert Oblon between January 1, 2019 and the present date.

Cause No. 19-7298-367

ROBERT OBLON

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367TH JUDICIAL DISTRICT

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TO: ALL PARTIES BY AND THROUGH THEIR ATTORNEY(S) OF RECORD AS PROVIDED IN THE ATTACHED SERVICE LIST.

You will take notice that twenty (20) days after the service hereof, with attached questions, a deposition by written questions will be asked of the witness:

**JUDY WILLODSON-(Client Record Scope)
3000 N. ATLANTIC AVENUE, 6TH FLOOR, DAYTONA BEACH, FL 32118**

Such questions to be answered on or after *01/20/2020*, before a Notary Public at the instance of:

**Written Deposition Service, LLC
1755 Whittington Place, Suite 750
Dallas, TX 75234**

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Respectfully Submitted,

/s/Howard Klatsky

**Howard Klatsky
SBA #: 00786024
Fee, Smith, Sharp & Vitullo
13155 Noel Road, Suite 1000
Dallas, TX 75240
972-934-9100; Fax 972-934-9200
hklatsky@feesmith.com**

Attorney for: Plaintiff

CERTIFICATE OF SERVICE

I certify, as authorized agent for the attorney of record, Howard Klatsky that a true and exact copy of foregoing Notice of Intention to Take Deposition upon Written Questions was served to all attorneys of record in the above-styled and numbered matter, said service being effected in the following manner:

CERTIFIED MAIL/RETURN RECEIPT REQUESTED _____

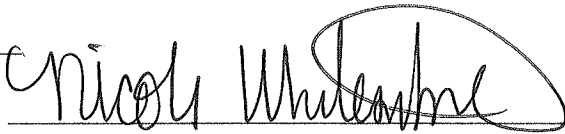
HAND DELIVERY _____

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DATED: 12/17/19

BY: 

SERVED TO ALL PARTIES LISTED BELOW:

Robert Oblon vs. Jordan Brock

ATTORNEYS OF RECORD

Andrew Speicher
Figari & Davenport, L.L.P.
Bank of America Plaza
901 Main Street, Suite 3400
Dallas, TX 75202
214-939-2000; Fax: 214-939-2090
Attorney For: Defendant

CAUSE NO: 19-7298-367

ROBERT OBLON

§ IN THE DISTRICT COURT OF

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DENTON COUNTY, TEXAS

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JORDAN BROCK

§

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367TH JUDICIAL DISTRICT

**DIRECT QUESTIONS TO BE PROPOUNDED TO THE WITNESS:
JUDY WILLODSON**

1. State your full name and occupation, address and telephone number.

ANSWER: (NAME) _____
(OCCUPATION) _____
(ADDRESS) _____
(CITY, STATE, ZIP) _____
(TELEPHONE #) _____

2. In response to the Subpoena Duces Tecum you received, have you produced **RECORDS AS NAMED IN THE ATTACHED EXHIBIT?**

ANSWER: _____

3. Are you able to identify these records as the originals or true and correct copies of the originals?

ANSWER: _____

4. Were these records made and kept in the regular course of your business?

ANSWER: _____

5. In the regular course of business of your practice, business, or institution, did the person who signed the records and/or reports either have personal knowledge of the entries shown on the records and/or reports, or obtain the information to make the entries from the sources who have such personal knowledge?

ANSWER: _____

6. Were such memoranda or documents then transmitted to your files and thereafter maintained under your care, supervision, direction, custody, control or access as custodian of this facility?

ANSWER: _____

7. Were the memoranda or documents that were transmitted to your files original entries on the part of the Custodian or other employee or member of the staff of this facility?

ANSWER: _____

8. Were the records or documents prepared at or about the time of the events and conditions they record?

ANSWER: _____

9. Were these records kept as described in the previous questions?

ANSWER: _____

10. Please examine copies of the original requested records. Have you produced records for attachment to this Deposition?

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ANSWER: _____

13. In the event that no records can be found, are there document archives (i.e. microfiche) or document retention policies which explain their absence? If so, please identify who has knowledge of those archives or policies of the above named facility.

ANSWER: _____

14. Are you aware that it may be necessary to subpoena you or your employer to court at the time of trial if you have not provided all of the papers, notes, documents, records, general correspondence, or other tangible items of any kind pertaining to the above named individual to the Notary Public taking your deposition?

ANSWER: (circle one) YES/NO

I, _____ (Witness), do swear or affirm that my answers to the above questions are the truth, the whole truth and nothing but the truth, so help me God.

Witness

I, _____, A Notary Public, do hereby certify the above Witness was duly sworn and the non-stenographic recording of this Written Deposition is a true record of the Witness testimony.

GIVEN UNDER MY HAND AND SEAL OF OFFICE, THIS ____ DAY OF _____, 20__.

SIGNATURE OF NOTARY PUBLIC IN AND FOR THE STATE OF FL

NAME OF NOTARY PUBLIC TYPED OR PRINTED
My Commission expires _____

EXHIBIT

Documents to be produced:

1. All communications (including all texts, emails, and other written communications) that Judy Willodson Sent to Jordan Brock that discuss and/or reference Robert Oblon between January 1, 2019 and the present date; and
2. All communications (including all texts, emails, and other written communications) that Judy Willodson received from Jordan Brock that discuss and/or reference Robert Oblon between January 1, 2019 and the present date.

**SUBPOENA DUCES TECUM
THE STATE OF TEXAS**

County of Denton

Greeting, to any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under Rule 176 of Texas Rules of Civil Procedure: You are hereby commanded to subpoena and summon the following witness(es):

Witness: MARK WILLODSON

to be and appear before a Notary Public of my designation for **Written Deposition Service, LLC, 1755 Whittington Place, Suite 750, Dallas, TX 75234**, on or after **01/20/2020** at the office of the summoned witness. There under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying **RECORDS AS NAMED IN THE ATTACHED EXHIBIT**; at any and all times whatsoever.

Then and there to give evidence at the instance of the **Plaintiff, Robert Oblon**, represented by **Howard Klatsky**, Texas Bar No. **00786024** Attorney of Record, in that Certain Cause No. **19-7298-367**, pending on the docket of the **District Court of the 367th Judicial District of Denton County, Texas**.

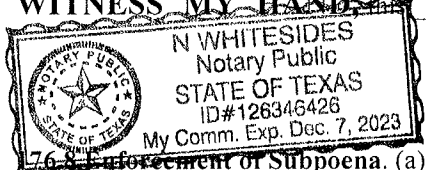
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

Robert Oblon vs. Jordan Brock

and there remain from day to day and time to time until discharged according to law.

WITNESS MY HAND

27th day of December, 2019.



[Handwritten Signature]

NOTARY PUBLIC

Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both. This subpoena falls under exception to confidentiality, Rule 509 (e) Texas rules of Civil Evidence.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____ and executed this the _____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof, with attached witness fee of \$ _____.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. **67701.001**

SUBPOENA DUCES TECUM THE STATE OF TEXAS

County of Denton

Greeting, to any Sheriff or Constable of the State of Texas or other person authorized to serve subpoenas under Rule 176 of Texas Rules of Civil Procedure: You are hereby commanded to subpoena and summon the following witness(es):

Witness: JUDY WILLODSON

to be and appear before a Notary Public of my designation for **Written Deposition Service, LLC, 1755 Whittington Place, Suite 750, Dallas, TX 75234**, on or after **01/20/2020** at the office of the summoned witness. There under oath to make answers of certain written questions to be propounded to the witness and to bring and produce for inspection and photocopying **RECORDS AS NAMED IN THE ATTACHED EXHIBIT**; at any and all times whatsoever.

Then and there to give evidence at the instance of the **Plaintiff, Robert Oblon**, represented by **Howard Klatsky**, Texas Bar No. **00786024** Attorney of Record, in that Certain Cause No. **19-7298-367**, pending on the docket of the **District Court of the 367th Judicial District of Denton County, Texas**.

This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

Robert Oblon vs. Jordan Brock

and there remain from day to day and time to time until discharged according to law.

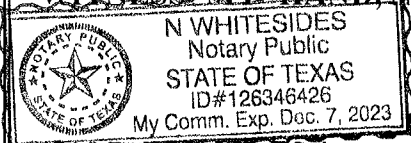
~~WITNESS MY HAND~~, this

27th

day of

December

2019.



A handwritten signature in black ink, appearing to read "N Whitesides", written over a horizontal line.

NOTARY PUBLIC

176.8 Enforcement of Subpoena. (a) *Contempt.* Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served, and may be punished by fine or confinement, or both. This subpoena falls under exception to confidentiality, Rule 509 (e) Texas rules of Civil Evidence.

OFFICER'S RETURN

Came to hand this _____ day of _____, 20____ and executed this the _____ day of _____, 20____, in the following manner: By delivering to the witness _____, a true copy hereof, with attached witness fee of \$_____.

Returned this _____ day of _____, 20____.

PROCESS SERVER

Order No. 67701.002