

CAUSE NO. 366-04941-2019

SHARING SERVICES GLOBAL CORPORATION f/k/a	§	IN THE DISTRICT COURT OF
SHARING SERVICES, INC.,	§	
ELEPRENEURS U.S., LLC f/k/a	§	
ELEPRENEUR, LLC and	§	
ELEVACITY U.S., LLC f/k/a	§	
ELEVACITY GLOBAL, LLC,	§	
	§	
Plaintiffs,	§	
	§	
v.	§	COLLIN COUNTY, TEXAS
	§	
ROBERT OBLON,	§	
	§	
Defendant.	§	366 th JUDICIAL DISTRICT

PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AND OBJECTIONS TO DEFENDANT'S NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS OF MARK WILLODSON AND JUDY WILLODSON

TO THE HONORABLE JUDGE OF SAID COURT:

Plaintiffs Sharing Services Global Corporation f/k/a Sharing Services, Inc., Elepreneurs U.S., LLC f/k/a Elepreneur, LLC and Elevacity U.S., LLC f/k/a Elevacity Global, LLC (collectively referred to as "SHRG") file their Motion for Protective Order and Objections to Defendant's Notice of Intention to Take Deposition by Written Questions of Mark Willodson, and Direct Questions to be Propounded to the Witnesses: Mark Willodson and Notice of Intention to Take Deposition by Written Questions of Judy Willodson, and Direct Questions to be Propounded to the Witnesses: Judy Willodson, and would respectfully show the

Court as follows:

1. SHRG filed their Second Amended Petition and Second Amended Verified Application for Injunctive Relief on December 19, 2019. This is Plaintiffs' live pleading.

2. Defendant filed his First Amended Answer on December 26, 2019, having filed an Original Counterclaim on September 11, 2019. These are Defendant's live pleadings.

3. On December 27, 2019 Defendant purported to serve Notices of Intention to Take Deposition by Written Questions on Mark Willodson and Intention to Take Deposition by Written Questions on Judy Willodson (collectively referred to as "Deposition by Written Question of the Willodsons") whose addresses are listed as being "3000 N. Atlantic Avenue, 6th Floor, Daytona Beach, FL 32118". *See Exhibit "A"* attached hereto, at p. 3. This Deposition by Written Question of the Willodsons states that it is being served pursuant to Texas Rules of Civil Procedure 200 and 201(b) and that a subpoena will issue to the deponents. *Id.* at pp. 2-3.

4. SHRG objects to the discovery sought in the Deposition by Written Question of the Willodsons on the grounds that: (a) the requests are overly broad, (b) the requests are irrelevant and not reasonably calculated to the lead to the discovery of admissible evidence as to any relevant issue in this lawsuit; (c) constitute an invasion of the personal privacy interests of either or both the non-parties Mark Willodson, Judy Willodson, and/or SHRG; and (d) are procedurally

improper.

5. Specifically, the respective claims and defenses of the parties to this suit all relate to a settlement agreement signed and dated July 26, 2019 by and between Plaintiffs and Defendant. Conversely, the Deposition by Written Question of the Willodsons seeks documents “between January 1, 2019 and the present date”, and as such, is overly broad and irrelevant on its face. Moreover, the requests contained therein are not limited to any subject matter and do not reference any of the claims or defenses at issue in this lawsuit, but merely seek documents that “discuss and/or reference [Defendant]” as opposed to seeking information related to any specific allegations in this lawsuit. Thus, the requests are overly broad on their face.

6. Further, the lack of specificity in the requests and lack of reference to any allegations in the pleadings in this matter present the inherent risk and likelihood that such requests may include information which invades the privacy rights of the deponents and/or persons affiliated with SHRG. Thus, an inherent need exists to seek protection from the Court related the proper scope, if any, of the referenced requests.

7. Finally, the Deposition by Written Question of the Willodsons alone is not a proper procedural vehicle to obtain information from out-of-state non-parties who are not within the subpoena range set forth in the applicable rules. Although Texas Rule of Civil Procedure 201.1(a) provides that a party may take the deposition

on written questions of persons in another state by, among other things, “notice,” Rule 201.1(b) provides that a request by “notice” alone requires that any such request be done “in accordance with these rules”. TEX. R. CIV. P. 201.1(a)-(b). Moreover, Texas Rules of Civil Procedure 205.2-205.3, governing discovery from non-parties, require that any party seeking discovery from a non-party must serve both a notice and a subpoena on the non-party. TEX. R. CIV. P. 205.2-205.3. Finally, Texas Rule of Civil Procedure 176.3 provides that no person may be required by subpoena to appear or produce documents in a county which is more than 150 miles from where the person resides or is served. TEX. R. CIV. P. 176.3.

8. The address listed for Mark Willodson and Judy Willodson is clearly outside of the applicable subpoena range under the applicable Texas Rules of Civil Procedure , thus, Defendant’s notice of the Deposition by Written Question of the Willodsons alone is not compliant with the rules. Rather, the proper procedure for obtaining discovery from Mark Willodson and/or Judy Willodson at the address listed in the notice is for the Court, on motion of a party, to issue letters rogatory or letter of request to a court having subpoena jurisdiction over the Willodsons in Florida. TEX. R. CIV. P. 201.1(a)-(d).

9. Clearly the requests set forth in the Deposition by Written Question of the Willodsons seek information by and between non-parties and SHRG; thus, the requested discovery affects SHRG, and as such, SHRG is entitled to seek issuance of a protective order pursuant to Rules 192.6 and 176.6(e) of the Texas Rules of

Civil Procedure regarding the noted Deposition by Written Question of the Willodsons.

WHEREFORE, Plaintiffs Sharing Services Global Corporation f/k/a Sharing Services, Inc., Elepreneurs U.S., LLC f/k/a Elepreneur, LLC and Elevacity U.S., LLC f/k/a Elevacity Global, LLC, respectfully request that its objections to the Notice of Intention to Take Deposition by Written Questions of Mark Willodson and Direct Questions to be Propounded to the Witness: Mark Willodson; and, Notice of Intention to Take Deposition by Written Questions of Judy Willodson and Direct Questions to be Propounded to the Witness: Judy Willodson, be sustained and that this Court issue an appropriate Protective Order declaring that witnesses Mark Willodson and Judy Willodson, not be required to respond to the Written Questions or produce documents responsive thereto until further order of this Court, and for any further and other relief to which it may be entitled.

Respectfully submitted,

JONES, DAVIS & JACKSON, PC

By: /s/ Wendy D. Dawer

Matthew K. Davis
State Bar No. 05526000
mdavis@jonesdavis.com
Scott R. Meyer
State Bar No. 24051046
smeyer@jonesdavis.com
Wendy D. Dawer
State Bar No. 24036451
wdawer@jonesdavis.com

15110 Dallas Parkway, Suite 300
Dallas, Texas 75248
Telephone: (972) 733-3117
Fax: (972) 733-3119

ATTORNEYS FOR PLAINTIFFS

CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing document was served on this 6th day of January 2020 as follows:

Howard Klatsky, Eq.
Fee, Smith, Sharp & Vitullo
13155 Noel Rd., Suite 1000
Dallas, TX 75240
(Via E-mail: hklatsky@feesmith.com)

Mark Willodson
3000 N. Atlantic Ave.
6th Floor
Daytona Beach, FL 32118
Via Certified Mail No. 70190700000030390027
and First-Class Mail

**PLAINTIFFS' MOTION FOR PROTECTIVE ORDER AND OBJECTIONS TO DEPOSITION BY
WRITTEN QUESTION OF MARK WILLODSON AND JUDY WILLODSON – Page 6**

Judy Willodson
3000 N. Atlantic Ave.
6th Floor
Daytona Beach, FL 32118
Via Certified Mail No. 70190700000030385566
and First-Class Mail

/s/ Wendy D. Dawer



1755 Whittington Place, Suite 750
Dallas, TX 75234

Telephone (972) 488-5555 ~ Facsimile (972) 488-5590 ~ (800) 346-4405
Karen.Glantz@wdslegal.com ~ www.writtendeposition.com

FACSIMILE COVER SHEET

Date: 12/27/19

Total Pages: 18 (INCLUDING COVER PAGE)

To: **Matthew K. Davis**

Fax: 972-733-3119

From: Nicole

Re: **Sharing Services Global Corporation, et al vs. Robert Oblon**
File Name/Pertaining to: **SHARING SERVICES GLOBAL CORPORATION,
ET AL VS. ROBERT OBLON**
WDS ORDER #: 67700

Comments: ATTACHED PLEASE FIND A WAIVER AND NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS. PLEASE COMPLETE THE ATTACHED WAIVER AND RETURN TO OUR OFFICE VIA FAX UPON RECEIPT. IF YOU PLAN TO FILE CROSS QUESTIONS OR MOTIONS, PLEASE ADVISE OUR OFFICE RIGHT AWAY. ALSO NOTE, WE WILL NEED TO RECEIVE COPIES OF ANY MOTIONS OR ADDITIONAL QUESTIONS. THANK YOU.

CONFIDENTIALITY NOTICE

The documents accompanying this telecopy transmission may contain confidential information which is legally privileged. The information is intended only for the use of the recipient named above. If you have received this telecopy in error, please immediately notify us by telephone to arrange for return of the original documents to us, and you are hereby notified that any disclosure, copying, distribution, or taking of any action in reliance on the contents of this telecopy information is strictly prohibited.

EXHIBIT A

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

Telephone: (972) 488-5555 ~ Facsimile: (972) 488-5590 ~ (800) 346-4405
www.WrittenDeposition.com

Cause No. 366-04941-2019

Sharing Services Global Corporation, et al vs. Robert Oblon

WAIVER OF NOTICE

Our client, Howard Klatsky, has commissioned Written Deposition Service, LLC to obtain records as named in the attached questions and/or exhibit. As authorized under Rule 200, Texas Rules of Civil Procedure, a Subpoena will be issued forthwith to direct the below named witness(es) to make all records as named in the attached questions and/or exhibit available for photographic reproduction, and to answer the Direct and Cross Written Questions, if any. Said deposition when so taken, may be used as evidence upon trial of the above numbered cause.

IF COPIES ARE DESIRED, PLEASE INDICATE BELOW BY MARKING Y OR N.

WDS Order # (s): 67700

_____ 1 MARK WILLODSON (Client Record Scope)

_____ 2 JUDY WILLODSON (Client Record Scope)

WAIVER PERIOD

YES, I agree to Waive	NO, I do not agree to Waive
-----------------------	-----------------------------

CROSS-QUESTIONS/OBJECTIONS/MOTIONS

	Yes, we will be issuing Cross Questions, Filing Objections and/or a Motion. (FYI: Cross Questions must be submitted in accordance with the ten day rule as recorded in TRCP, Rule 200.3(b).) Please EMAIL any Cross Questions/Objections/Motions directly to Nicole.WhiteSides@wdslegal.com (we do not accept E-file)
	No, we will not be issuing Cross-Questions and/or a Motion or Objections.

PURCHASE OF COPIES

	Yes, I would like to purchase copies. We will <u>require prepayment</u> , unless we have an established relationship with your firm. We will advise of cost on the Officer's Certification Cover Letter.
	As a standard we provide a hard copy of the records. **If you prefer electronic copies, please email Hayley.Groshon@wdslegal.com, along with this form, and include the email address of where records are to be sent.
	Direct bill my Carrier. Claim # _____, Insurance Co.: _____ Adjuster: _____ Address: _____
	No, I do not desire copies of these records
	Please send information regarding your service.

Matthew K. Davis~Represents: Plaintiff; Fax: 972-733-3119

Signed: _____ Date: _____

NOTE: IF YOU ARE SIMPLY RETURNING THIS FORM, PLEASE EMAIL TO:

Hayley.Groshon@wdslegal.com OR FAX TO 972-488-5590

FYI: As a service to our clients we maintain all records until we are notified that the case has been dismissed, etc.

Cause No. 366-04941-2019

**SHARING SERVICES GLOBAL
CORPORATION F/K/A SHARING
SERVICES, INC., et al**
vs.

§
§
§
§
§
§

IN THE DISTRICT COURT OF

366TH COUNTY, TEXAS

ROBERT OBLON

COLLIN 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: Defendant

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: Nicole White

SERVED TO ALL PARTIES LISTED BELOW:

Sharing Services Global Corporation, et al vs. Robert Oblon

ATTORNEYS OF RECORD

Matthew K. Davis
Jones, Davis & Jackson, PC
15110 Dallas Parkway, Suite 300
Dallas, TX 75248
972-733-3117; Fax: 972-733-3119
Attorney For: Plaintiff

CAUSE NO: 366-04941-2019

SHARING SERVICES GLOBAL
CORPORATION F/K/A SHARING
SERVICES, INC., et al
vs.

§ IN THE DISTRICT COURT OF
§
§
§ 366TH COUNTY, TEXAS
§
§
§
§ COLLIN JUDICIAL DISTRICT

ROBERT OBLON

**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 any officers or directors of Sharing Services Global Corporation (including Kip Allison, Keith Halls, and John "JT" Thatch) and/or counsel for Sharing Services Global Corporation (Steve Jones, Matt Davis, or anyone else employed by Jones, Davis & Jackson, PC) 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 any officers or directors of Sharing Services Global Corporation (including Kip Allison, Keith Halls, and John "JT" Thatch) and/or counsel for Sharing Services Global Corporation (Steve Jones, Matt Davis, or anyone else employed by Jones, Davis & Jackson, PC) that discuss and/or reference Robert Oblon between January 1, 2019 and the present date.

Cause No. 366-04941-2019

**SHARING SERVICES GLOBAL
CORPORATION F/K/A SHARING
SERVICES, INC., et al**
vs.

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**IN THE DISTRICT COURT OF

366TH COUNTY, TEXAS**

ROBERT OBLON

COLLIN 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:

**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**

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: Defendant

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 _____

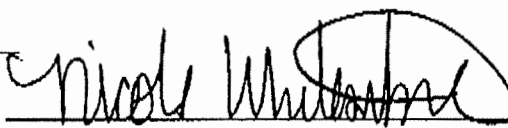
HAND DELIVERY _____

TELECOPY _____

OVERNIGHT/NEXT DAY DELIVERY VIA LONE STAR OR UPS _____

E-MAIL _____

DATED: 12/27/19

BY: 

SERVED TO ALL PARTIES LISTED BELOW:

Sharing Services Global Corporation, et al vs. Robert Oblan

ATTORNEYS OF RECORD

Matthew K. Davis
Jones, Davis & Jackson, PC
15110 Dallas Parkway, Suite 300
Dallas, TX 75248
972-733-3117; Fax: 972-733-3119
Attorney For: Plaintiff

CAUSE NO: 366-04941-2019

SHARING SERVICES GLOBAL
CORPORATION F/K/A SHARING
SERVICES, INC., et al
vs.

§ IN THE DISTRICT COURT OF
§
§
§ 366TH COUNTY, TEXAS
§
§
§
§ COLLIN JUDICIAL DISTRICT

ROBERT OBLON

**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?

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 Judy Willodson sent to any officers or directors of Sharing Services Global Corporation (including Kip Allison, Keith Halls, and John "JT" Thatch) and/or counsel for Sharing Services Global Corporation (Steve Jones, Matt Davis, or anyone else employed by Jones, Davis & Jackson, PC) 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 any officers or directors of Sharing Services Global Corporation (including Kip Allison, Keith Halls, and John "JT" Thatch) and/or counsel for Sharing Services Global Corporation (Steve Jones, Matt Davis, or anyone else employed by Jones, Davis & Jackson, PC) that discuss and/or reference Robert Oblon between January 1, 2019 and the present date.

SUBPOENA DUCES TECUM THE STATE OF TEXAS

County of 366th

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 **Defendant, Robert Oblon**, represented by **Howard Klatsky**, Texas Bar No. 00786024 Attorney of Record, in that Certain Cause No. **366-04941-2019**, pending on the docket of the **District Court of the Collin Judicial District of 366th County, Texas**.

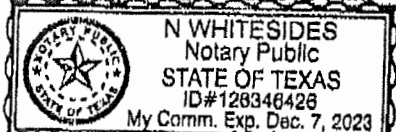
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

Sharing Services Global Corporation, et al vs. Robert Oblon

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.



[Signature]
NOTARY PUBLIC

Enforcement of Subpoena 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. 67700.001

SUBPOENA DUCES TECUM THE STATE OF TEXAS

County of 366th

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

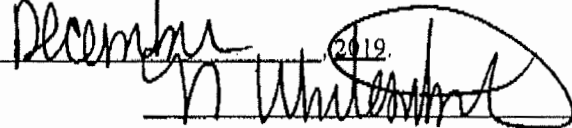
to be and appear before a Notary Public of my designation for **Written Deposition Service, LLC, 1755 Whittington Place, Suite 750, Dallas, TX 75234**, on or after **01/20/2020** at the office of the summoned witness. There under oath to make answers of certain written questions to be propounded to the 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 Defendant, Robert Oblon, represented by Howard Klatsky, Texas Bar No. 00786024 Attorney of Record, in that Certain Cause No. 366-04941-2019, pending on the docket of the District Court of the Collin Judicial District of 366th County, Texas.

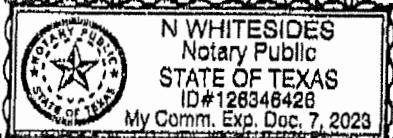
This Subpoena is issued under and by virtue of Rule 200 and Notice of Deposition Upon Written Questions on file with the above named court, styled

Sharing Services Global Corporation, et al vs. Robert Oblon

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

WITNESS MY HAND, this 27th day of December, 2019.


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. 67700.002