

DEPOSITION SUBPOENA TO TESTIFY OR PRODUCE DOCUMENTS OR THINGS

THE STATE OF TEXAS

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. - GREETINGS

You are hereby commanded to subpoena and summon the following witness(es):

Custodian of Records for: **GoDaddy.com, Inc.**
Compliance Department - 14455 North Hayden Rd., Suite 219, Scottsdale, AZ 85260

to be and appear before a Notary Public for **Hanszen Laporte, LLP** or its designated agent. on **September 1, 2020**, at **2:00 p.m.** at the office of the custodian and 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:


Those documents requested in the attached **Exhibit "A"** 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 pertaining to: **Case #067-270669-14**

at any and all times whatsoever, then and there to give evidence at the instance of the Applicant, **Neal Rauhauser**, represented by **Jeffrey L. Dorrell**, Attorney of Record, in that Certain Cause No. **067-270669-14** pending on the docket of the 67th District Court, Tarrant 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 : James McGibney v. Thomas Retzlaff

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

WITNESS MY HAND, on August 11, 2020.



SIGNATURE OF ISSUING OFFICER
Jeffrey L. Dorrell
14201 Memorial Drive
Houston, TX 77079
713-522-9444

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.

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 and by tendering all fees as required.

Returned this ___ day of _____, 20___.

SIGNATURE OF SERVER

JAMES MCGIBNEY and	§	IN THE DISTRICT COURT OF
VIAVIEW, INC.,	§	
<i>Plaintiffs,</i>	§	
v.	§	
THOMAS RETZLAFF, LORA	§	TARRANT COUNTY, TEXAS
LUSHER, JENNIFER	§	
D'ALLESANDRO, NEAL	§	
RAUHAUSER, MISSANNONEWS,	§	
and JANE DOES 1-5,	§	
<i>Defendants</i>	§	67th JUDICIAL DISTRICT

AMENDED NOTICE OF INTENTION TO TAKE DEPOSITION BY WRITTEN QUESTIONS

TO: Plaintiffs, by and through their attorney of record, Evan Stone.

Please Note that pursuant to Texas Rules of Civil Procedure 200, at least twenty days from the service of this notice, question, and Exhibit A, upon all counsel of record, defendant intends to depose by written questions, the Custodian of Records for:

GoDaddy.com, Inc.
Compliance Department
14455 North Hayden Road, Suite 219
Scottsdale, AZ 85206

before a Notary Public for: **Hanszen Laporte, LLP, 14201 Memorial Drive, Houston, Texas 77079** or its designated agent, to be used as evidence in the above-styled and numbered cause. A copy of the Deposition Questions is attached hereto and will be propounded by a representative of Hanszen Laporte, LLP.

As authorized by Rules 176 and 200, Texas Rules of Civil Procedure, a subpoena is issued to the witness for the production of documents as described in the attached Deposition Questions and/or Exhibit and any other such record in the possession, custody or control of the 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 may be made and attached to the witness deposition.

By: _____ /s/ Jeffrey L. Dorrell

Jeffrey L. Dorrell
State Bar No. 00787386
jdorrell@hanszenlaporte.com
14201 Memorial Drive
Houston, Texas 77079
Telephone: 713-522-9444; Fax: 713-524-2580
ATTORNEYS FOR DEFENDANT NEAL RAUHAUSER

CERTIFICATE OF SERVICE

I hereby certify that on 8-11, 2020, a true and correct copy of the foregoing was sent by:

- Hand delivery
- Certified mail
- Telephonic document transfer
- E-service

in accordance with TEX. R. CIV. P. 21a to the following counsel of record:

Mr. Evan Stone
evan@stonevaughanlaw.com
Stone & Vaughan, PLLC
624 W. University Drive, Suite 386
Denton, Texas 76201
Telephone: 469-248-5238
FAX: 310-756-1201
COUNSEL FOR PLAINTIFFS

/s/ Jeffrey L. Dorrell

JEFFREY L. DORRELL

JAMES MCGIBNEY and	§	IN THE DISTRICT COURT OF
VIAVIEW, INC.,	§	
<i>Plaintiffs,</i>	§	
v.	§	
THOMAS RETZLAFF, LORA	§	TARRANT COUNTY, TEXAS
LUSHER, JENNIFER	§	
D'ALLESANDRO, NEAL	§	
RAUHAUSER, MISSANNONEWS,	§	
and JANE DOES 1-5,	§	
<i>Defendants</i>	§	67th JUDICIAL DISTRICT

**DEPOSITION ON WRITTEN QUESTIONS
DIRECT QUESTIONS TO PROPOUNDED TO THE WITNESS**

TO: Custodian of Records for GoDaddy.com, Inc., for **any records as described on the attached Exhibit "A" and in the attached subpoena.**

1. Please print your full name.

Response: _____

2. Please name your employer.

Response: _____

3. Please identify you position or job title within your company.

Response: _____

4. Are these memoranda, reports, records, or data compilation in Exhibit A to the subpoena in your custody or subject to your control, supervision, or direction?

Response: _____

5. Are you able to identify these records identified in question number 4 as the originals or true and correct copies of the originals?

Response: _____

6. Please attach to this deposition copies of the memoranda, reports, records, or data compilations, mentioned in question number 4. If you have not complied, why?

Response: _____

7. Are the copies which you have attached true and correct copies of such memoranda, reports, records, or data compilations?

Response: _____

8. Were such memoranda, reports, records, or data compilations kept in the regular course of business of your employer?

Response: _____

9. Was it in the regular course of business of this facility for a person with knowledge of the acts, events, conditions or opinion recorded, to make the record or to transmit information thereof to be included in such record?

Response: _____

10. Were the entries on these records made at or shortly after the time of the transaction recorded?

Response: _____

11. Was the preparation of these records trustworthy and in keeping with general standards of practice?

Response: _____

WITNESS (Custodian of Records)

Before me on this day personally appeared the above witness, known to me to be the person whose name is subscribed to the foregoing instrument, who being first duly sworn stated that the answers to the foregoing questions are true and correct.

SWORN TO AND SUBSCRIBED before me this _____ day of _____, 2020.

NOTARY PUBLIC

EXHIBIT "A"

1. Provide any documents or tangible items which reflect the original registration and any subsequent registrations or transfers of the following domain names or any iteration thereof:

www.nealrauhauser.com
www.nealrauhauser.net
www.nealrauhauser.org
www.nealrauhauser.info
www.nealrauhauser.exposed
www.rauhauserunmasked

2. Provide any documents or tangible items which reflect the original registration and any subsequent registrations or transfers of any iteration of the name Jeffrey Lee Dorrell, including:

www.jeffreyldorrell.com	www.jeffdorrell.com
www.jeffreyldorrell.net	www.jeffdorrell.net
www.jeffreyldorrell.org	www.jeffdorrell.org
www.jeffreyldorrell.info	
www.jeffreyldorrell.com	

3. Provide all communications from or to James McGibney that pertains to the domain names in categories 1 and 2 above.

4. Provide all communications from or to any representative of ViaView, Inc. that pertains to the domain names in categories 1 and 2 above.

5. Should the original owner of the domain names in categories 1 and 2 not be either James McGibney or ViaView, Inc., please provide all available information on the originator of the registration.