

FILED IN UNITED STATES DISTRICT  
COURT, DISTRICT OF UTAH

AUG 27 2020

D. MARK JONES, CLERK

BY DEPUTY CLERK

Roger Hamblin  
Name  
30 W. 300 N.  
Address  
IVINS, UTAH 84738  
City, State, Zip  
435-668-9029  
Phone  
4rogham@gmail.com  
Email

In the ☒ District ☐ Justice ☐ Juvenile Court of UtahCENTRAL Judicial District WASHINGTON County

Court Address \_\_\_\_\_

UNITED STATES of America

Plaintiff/Petitioner

MOTION TO QUASH  
Objection to Subpoena2:15-CV-00828-DN  
Case Number

V. RAPPORT-3 LLC, INTERNATIONAL AUTOMATED  
SYSTEMS, INC LTB LLC GREGORY SHEPARD  
WILSON JOHNSON, ROGER FREEBORN  
Defendant/Respondent

DAVID NUFFER  
Judge  
MAGISTRATE  
Judge DAHME A. Oberg  
Commissioner

**Instructions:** URCP 45 limits the grounds for an objection. For each of the grounds other than (2) or (3) please provide a full explanation. Attach additional sheets as necessary.

I have been served with a subpoena in this case, and I object because the subpoena:

1. ☒ Fails to allow me a reasonable time in which to comply.

SEE ATTACHMENT SERVED FRI NIGHT 8-21-20 4:04 PM  
REQUIRES I APPEAR AT 9:00AM ON 9-1-20

2. ☒ Requires me, a resident of Utah, to:

- ☒ appear at a deposition;  
☐ produce documents, electronic records or tangible things; or  
☐ permit inspection of premises

LESS THAN 8 BUSINESS DAYS  
NOT 14 FOR RESPONSE

in a county in which I do not reside, am not employed, and do not transact business in person.

3. ☐ Requires me, a non-resident of Utah, to:

- ☐ appear at a deposition;
- ☐ produce documents, electronic records or tangible things; or
- ☐ permit inspection of premises

in a county other than the county in which I was served.

4. ☐ Requires me to disclose privileged or other protected matter and no exception or waiver applies. (If you object to the subpoena for these grounds, you must describe the nature of the document or thing with sufficient specificity to enable the party or attorney to contest your objection.)

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5. ☐ Requires me to disclose a trade secret or other confidential research, development, or commercial information. (If you object to the subpoena for these grounds, you must describe the nature of the document or thing with sufficient specificity to enable the party or attorney to contest your objection.)

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6. ☐ Subjects me to an undue burden.

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7. ☐ Requires me to disclose an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study that was not made at the request of a party.

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8. ☒ Other.

SEE ATTACHMENTS A, B, C, D

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I declare under criminal penalty under the law of Utah that everything stated in this document is true.

Signed at IVINS, UTAH USA (city) and state or country).

Date 8-27-2020

Signature ►

  
ROGER HAMBLIN

Printed Name

Person subject to subpoena ☒

Attorney for person subject to subpoena ☐

**Certificate of Service**

I certify that I filed with the court and am serving a copy of this Objection to Subpoena on the following people.

Person's Name	Service Method	Service Address	Service Date
MICHAEL S. LEHR MLEHA@ PARR.BROWN. COM.	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input checked="" type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)	201 So, 200 EAST SUITE 700 SLC, UTAH 84111 801-532-7840	8-27-20
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		
	<input type="checkbox"/> Mail <input type="checkbox"/> Hand Delivery <input type="checkbox"/> E-filed <input type="checkbox"/> Email <input type="checkbox"/> Left at business (With person in charge or in receptacle for deliveries.) <input type="checkbox"/> Left at home (With person of suitable age and discretion residing there.)		

Date

Signature ►

Printed Name