

IN THE SUPREME COURT

Action No. 10 SSC 002)	
)	
Adam J. Horowitz, Leah Josephson,)	MOTION TO
PLAINTIFFS)	SUBPOENA RELATED
)	DOCUMENTS
Versus)	
)	
Hogan Medlin and Andrew Phillips,)	
DEFENDANTS)	

As permitted by Title III, Section 521, the Defense files a motion requesting that several documents be subpoenaed. The specific documents to which the Defense requests access are as follows:

1. All correspondence, electronic or otherwise, between the Board of Elections and UNC Department of Housing regarding the February 8, 2011 elections and UCommons referendum.
2. All correspondence, electronic or otherwise, between the Board of Elections and the Union regarding the February 8, 2011 elections and the UCommons referendum.
4. All correspondence, electronic or otherwise, between the Student Body President and the Union regarding the February 8, 2011 elections and the UCommons referendum.
5. The minutes, electronic or otherwise of all Board of Directors meetings from the 2010-2011 academic year.
6. All correspondence, electronic or otherwise, between the Union and Union staff regarding the UCommons referendum within the 2010-2011 academic year.
7. All correspondence, electronic or otherwise, between members of the Plaintiff regarding the February 8, 2011 election and the UCommons referendum.

The Defense also requests the ability to file another motion to subpoena in the event that, in the course of reviewing the documents above, it uncovers the existence of a new documents not specifically covered by this motion to subpoena, with whatever restrictions the Court finds to be appropriate. The Defense acknowledges that the

Court will weigh the merits of that motion and has the authority to grant or deny that motion.

I do affirm that I have read in full the foregoing motion and that the allegations contained therein are true to the best of my knowledge and belief.

Respectfully Submitted,

Kevin Whitfield

Counsel for the Defense
146 East Longview Street
Chapel Hill, NC 27516
kmwhitfield@gmail.com
(252) 367.1177

Filed this the 12th day of February, 2011, at 6:32p.m.