

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES **PLAINTIFF**

v. **CAUSE No. 22-cv-00286-EFP**

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC., ET AL. **DEFENDANTS**

and

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC. **COUNTER-PLAINTIFF**

v.

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES **COUNTER-DEFENDANT**

SUBPOENA DUCES TECUM

STATE OF MISSISSIPPI
COUNTY OF HINDS

**TO: Dewey Phillip Bryant
7009 Highway 28
Hazlehurst, MS 39083**

YOU ARE HEREBY SUMMONED to produce, ON OR BEFORE 10 DAYS FROM THE DATE OF RECEIPT OF THIS SUBPOENA, a true and correct copy of the documents designated below, and to mail or otherwise transmit exact copies of said documents to counsel for Mississippi Community Education Center at Carroll Bufkin, PLLC, 1076 Highland Colony Parkway, 600 Concourse, Suite 125, Ridgeland, Mississippi 39157. The documents to be produced are:

ALL DOCUMENTS DESCRIBED IN EXHIBIT "A"

Your personal appearance is not required. The requested Documents may be delivered personally to counsel or by U.S. Mail or other carrier to arrive at the aforesaid location within ten (10) days from the date this Subpoena was served.

Please complete and return a notarized original of the attached "Certificate of Authenticity" with your production of Documents.

HEREIN YOU SHALL NOT FAIL UNDER PENALTY IN SUCH CASE PROVIDED, and have then and there this writ.

GIVEN UNDER MY HAND AND SEAL AND ISSUED BY THIS OFFICE, this the 25 day of July 2022.

HINDS COUNTY CIRCUIT COURT

By: *M. Green*

Deputy Clerk



ISSUED AT THE REQUEST OF

Thomas G. Bufkin
Luke E. Whitaker
CARROLL BUFKIN, PLLC
1076 Highland Colony Parkway
600 Concourse, Suite 125
Ridgeland, MS 39157
T: (601) 982-5011
F: (601) 853-9540
tgb@carrollbufkin.com
lwhitaker@carrollbufkin.com

CERTIFICATE OF AUTHENTICITY

I HEREBY CERTIFY that the reproduction of records attached to this certificate are, to the best of my knowledge, true and accurate copies of the records requested in this Subpoena Duces Tecum. The originals of said documents are on file with me personally and said records were made and kept in the regular course of business.

I FURTHER CERTIFY that I am the person responsible for maintaining and controlling these records, and/or the appointed designee responsible for the release of these records.

Dated this the ____ day of _____ 2022.

RECORDS CUSTODIAN

STATE OF MISSISSIPPI

COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____
2022.

NOTARY PUBLIC

My Commission Expires:

RETURN OF SERVICE

I, _____, process server, do hereby certify that I am not a party to the above-captioned civil action, am not less than 18 years of age, and have delivered the above-and-foregoing SUBPOENA DUCES TECUM by serving a true and correct copy of same upon _____.

This the ____ day of _____ 2022.

Process Server

STATE OF MISSISSIPPI
COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____ 2022.

NOTARY PUBLIC

My Commission Expires:

EXHIBIT “A” TO SUBPOENA

Definitions

A “**Document**” is any written, recorded, or graphic material of any kind, whether prepared by you or by any other person, that is in your possession, custody, or control. You are deemed to have “control” if you have the right to secure the Document or a copy thereof from another person or entity. The definition of “**Document**” includes, without limitation, electronic mail (“email”); text messages; instant messages; direct messages; correspondence; letters; telegrams; agreements; contracts; inter-office communications; memoranda; reports; summaries; notes; notebooks; scrapbooks; diaries; calendars; plans; drawings; sketches; blueprints; diagrams; photographs; photocopies; charts; graphs; descriptions; minutes of meetings, conferences, conversations or communications; invoices; purchase orders; bills of lading; recordings; published or unpublished speeches or articles; publications; transcripts; phone voice mail; ledgers; financial statements; accounting records; general ledgers; microfilm; microfiche; tape or disc recordings; and computer print outs. It also includes all drafts of a Document and all copies that differ in any respect from the original or other versions including any notation, underlining, marking, marginalia, or information of any kind not in any original or other versions. A “**Document**” further includes all electronically stored data from which any information can be obtained, either directly or indirectly, or by translation through detection devices or readers, and includes information stored in, or accessible through, computer or other information retrieval systems (including any computer archives or back-up systems).

The “**USM Volleyball Center**” refers to the facilities located on the University of Southern Mississippi campus at or around 101 M.K. Turk Circle, Hattiesburg, Mississippi 39406, which have been or are being used, in whole or in part, to serve women’s volleyball and/or women’s beach volleyball.

Exhibit "A"

DOCUMENTS TO BE PRODUCED WITHIN TEN (10) DAYS

1. All Documents including, without limitation, Documents reflecting communications between you and any person or entity concerning the USM Volleyball Center.
2. All Documents including, without limitation, Documents reflecting communications between you and any person or entity concerning funding for the USM Volleyball Center.
3. All Documents, including, without limitation, Documents reflecting communications between you and any person intended to further efforts to secure funding from MDHS for the USM Volleyball Center.

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES PLAINTIFF

v. CAUSE No. 22-cv-00286-EFP

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC., *ET AL.* DEFENDANTS

and

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC. COUNTER-PLAINTIFF

v.

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES COUNTER-DEFENDANT

SUBPOENA DUCES TECUM

STATE OF MISSISSIPPI
COUNTY OF HINDS

TO: **Office of Attorney General for Mississippi**
550 High Street
Jackson, Mississippi 39201

YOU ARE HEREBY SUMMONED to produce, ON OR BEFORE 10 DAYS FROM THE DATE OF RECEIPT OF THIS SUBPOENA, a true and correct copy of the documents designated below, and to mail or otherwise transmit exact copies of said documents to counsel for Mississippi Community Education Center at Carroll Bufkin, PLLC, 1076 Highland Colony Parkway, 600 Concourse, Suite 125, Ridgeland, Mississippi 39157. The documents to be produced are:

ALL DOCUMENTS DESCRIBED IN EXHIBIT "A"

Your personal appearance is not required. The requested Documents may be delivered personally to counsel or by U.S. Mail or other carrier to arrive at the aforesaid location within ten (10) days from the date this Subpoena was served.

Please complete and return a notarized original of the attached "Certificate of Authenticity" with your production of Documents.

HEREIN YOU SHALL NOT FAIL UNDER PENALTY IN SUCH CASE PROVIDED, and have then and there this writ.

GIVEN UNDER MY HAND AND SEAL AND ISSUED BY THIS OFFICE, this the 25 day of July 2022.

HINDS COUNTY CIRCUIT COURT

By: *M. Green*

Deputy Clerk



ISSUED AT THE RECEPTION

Thomas G. Bufkin
Luke E. Whitaker
CARROLL BUFKIN, PLLC
1076 Highland Colony Parkway
600 Concourse, Suite 125
Ridgeland, MS 39157
T: (601) 982-5011
F: (601) 853-9540
tgb@carrollbufkin.com
lwhitaker@carrollbufkin.com

CERTIFICATE OF AUTHENTICITY

I HEREBY CERTIFY that the reproduction of records attached to this certificate are, to the best of my knowledge, true and accurate copies of the records requested in this Subpoena Duces Tecum. The originals of said documents are on file at the **OFFICE OF THE ATTORNEY GENERAL FOR MISSISSIPPI** and said records are made and kept in the regular course of business.

I FURTHER CERTIFY that I am the person responsible for maintaining and controlling these records, and/or the appointed designee responsible for the release of these records.

Dated this the ____ day of _____ 2022.

RECORDS CUSTODIAN

STATE OF MISSISSIPPI

COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____
2022.

NOTARY PUBLIC

My Commission Expires:

RETURN OF SERVICE

I, _____, process server, do hereby certify that I am not a party to the above-captioned civil action, am not less than 18 years of age, and have delivered the above-and-foregoing SUBPOENA DUCES TECUM by serving a true and correct copy of same upon _____.

This the ____ day of _____ 2022.

Process Server

STATE OF MISSISSIPPI
COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____ 2022.

NOTARY PUBLIC

My Commission Expires:

EXHIBIT “A” TO SUBPOENA

Definitions

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The “**USM Volleyball Center**” refers to the facilities located on the University of Southern Mississippi campus at or around 101 M.K. Turk Circle, Hattiesburg, Mississippi 39406, which have been or are being used, in whole or in part, to serve women’s volleyball and/or women’s beach volleyball.

The “**USM Volleyball Center Leases**” include all Documents related in any way to:

- (a) “Amended and Restated Lease between the University of Southern Mississippi and the University of Southern Mississippi Athletic Foundation, Inc.” and/or
- (b) “Sublease between The University of Southern Mississippi Athletic Foundation, Inc. and Mississippi Community Education Center.”

“**TANF**” is the Temporary Assistance for Needy Families program operated by the State of Mississippi pursuant to Miss. Code Ann. 43-17-1 and 42 U.S.C. §601, as well as other provision of State and federal law.

EXHIBIT "A"

DOCUMENTS TO BE PRODUCED WITHIN TEN (10) DAYS

1. All Documents relating in any way to the USM Volleyball Center.
2. All Documents relating in any way to the USM Volleyball Center Leases.
3. All Documents reflecting or relating in any way to approval, in whole or in part, by the Office of the Attorney General for Mississippi of any aspect of the USM Volleyball Center and/or the USM Volleyball Center Leases.
4. All Documents reflecting or relating in any way to conclusions reached by the Office of the Attorney General for Mississippi, prior to the date of execution of the USM Volleyball Center Leases, that construction of the USM Volleyball Center was a permissible TANF expenditure and served a TANF purpose.

IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES PLAINTIFF

v. CAUSE No. 22-cv-00286-EFP

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC., *ET AL.* DEFENDANTS

and

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC. COUNTER-PLAINTIFF

v.

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES COUNTER-DEFENDANT

SUBPOENA DUCES TECUM

STATE OF MISSISSIPPI
COUNTY OF HINDS

TO: **Institutions of Higher Learning
State of Mississippi
3825 Ridgewood Rd.
Jackson, Mississippi 39211**

YOU ARE HEREBY SUMMONED to produce, ON OR BEFORE 10 DAYS FROM THE DATE OF RECEIPT OF THIS SUBPOENA, a true and correct copy of the documents designated below, and to mail or otherwise transmit exact copies of said documents to counsel for Mississippi Community Education Center at Carroll Bufkin, PLLC, 1076 Highland Colony Parkway, 600 Concourse, Suite 125, Ridgeland, Mississippi 39157. The documents to be produced are:

ALL DOCUMENTS DESCRIBED IN EXHIBIT "A"

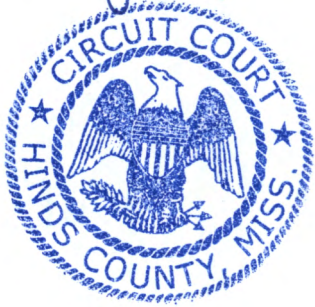
Your personal appearance is not required. The requested Documents may be delivered personally to counsel or by U.S. Mail or other carrier to arrive at the aforesaid location within ten (10) days from the date this Subpoena was served.

Please complete and return a notarized original of the attached "Certificate of Authenticity" with your production of Documents.

HEREIN YOU SHALL NOT FAIL UNDER PENALTY IN SUCH CASE PROVIDED, and have then and there this writ.

GIVEN UNDER MY HAND AND SEAL AND ISSUED BY THIS OFFICE, this the

25 day of July 2022.



HINDS COUNTY CIRCUIT COURT

By: M. Green

Deputy Clerk

ISSUED AT THE REQUEST OF:

Thomas G. Bufkin
Luke E. Whitaker
CARROLL BUFKIN, PLLC
1076 Highland Colony Parkway
600 Concourse, Suite 125
Ridgeland, MS 39157
T: (601) 982-5011
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tgb@carrollbufkin.com
lwhitaker@carrollbufkin.com

CERTIFICATE OF AUTHENTICITY

I HEREBY CERTIFY that the reproduction of records attached to this certificate are, to the best of my knowledge, true and accurate copies of the records requested in this Subpoena Duces Tecum. The originals of said documents are on file at the **INSTITUTIONS OF HIGHER LEARNING OF THE STATE OF MISSISSIPPI** and said records are made and kept in the regular course of business.

I FURTHER CERTIFY that I am the person responsible for maintaining and controlling these records, and/or the appointed designee responsible for the release of these records.

Dated this the 2 day of _____ 2022.

RECORDS CUSTODIAN

STATE OF MISSISSIPPI

COUNTY OF _____

SWORN AND SUBSCRIBE before me this the _____ day of _____
2022.

NOTARY PUBLIC

My Commission Expires:

RETURN OF SERVICE

I, _____, process server, do hereby certify that I am not a party to the above-captioned civil action, am not less than 18 years of age, and have delivered the above-and-foregoing SUBPOENA DUCES TECUM by serving a true and correct copy of same upon _____.

This the ____ day of _____ 2022.

Process Server

STATE OF MISSISSIPPI
COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____ 2022.

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- (b) “Sublease between The University of Southern Mississippi Athletic Foundation, Inc. and Mississippi Community Education Center.”

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2. All Documents relating in any way to the USM Volleyball Center Leases.
3. All Documents reflecting, or relating in any way to, approval, in whole or in part, by the Office of the Attorney General for Mississippi of any aspect of the USM Volleyball Center and/or either of the USM Volleyball Center Leases.

**IN THE CIRCUIT COURT OF HINDS COUNTY, MISSISSIPPI
FIRST JUDICIAL DISTRICT**

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES **PLAINTIFF**

v. **CAUSE No. 22-cv-00286-EFP**

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC., ET AL. **DEFENDANTS**

and

MISSISSIPPI COMMUNITY EDUCATION CENTER, INC. **COUNTER-PLAINTIFF**

v.

MISSISSIPPI DEPARTMENT OF HUMAN SERVICES **COUNTER-DEFENDANT**

SUBPOENA DUCES TECUM

STATE OF MISSISSIPPI
COUNTY OF HINDS

**TO: The University of Southern Mississippi Athletic Foundation, Inc.
Registered Agent: Richard C. Giannini
Pat Ferlise Center – 3001 West 4th Street
Hattiesburg, MS 39402**

YOU ARE HEREBY SUMMONED to produce, ON OR BEFORE 10 DAYS FROM THE DATE OF RECEIPT OF THIS SUBPOENA, a true and correct copy of the documents designated below, and to mail or otherwise transmit exact copies of said documents to counsel for Mississippi Community Education Center at Carroll Bufkin, PLLC, 1076 Highland Colony Parkway, 600 Concourse, Suite 125, Ridgeland, Mississippi 39157. The documents to be produced are:

ALL DOCUMENTS DESCRIBED IN EXHIBIT “A”

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GIVEN UNDER MY HAND AND SEAL AND ISSUED BY THIS OFFICE, this the 25 day of July 2022.

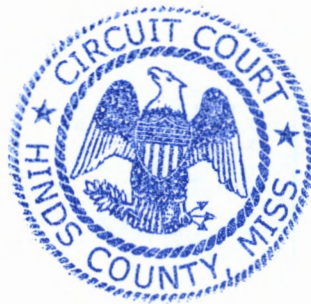
HINDS COUNTY CIRCUIT COURT

By: M. Green

Deputy Clerk

ISSUED AT THE REQUEST OF:

Thomas G. Bufkin
Luke E. Whitaker
CARROLL BUFKIN, PLLC
1076 Highland Colony Parkway
600 Concourse, Suite 125
Ridgeland, MS 39157
T: (601) 982-5011
F: (601) 853-9540
tgb@carrollbufkin.com
lwhitaker@carrollbufkin.com



CERTIFICATE OF AUTHENTICITY

I HEREBY CERTIFY that the reproduction of records attached to this certificate are, to the best of my knowledge, true and accurate copies of the records requested in this Subpoena Duces Tecum. The originals of said documents are on file at **THE UNIVERSITY OF SOUTHERN MISSISSIPPI ATHLETIC FOUNDATION, INC.** and said records are made and kept in the regular course of business.

I FURTHER CERTIFY that I am the person responsible for maintaining and controlling these records, and/or the appointed designee responsible for the release of these records.

Dated this the ____ day of _____ 2022.

RECORDS CUSTODIAN

STATE OF MISSISSIPPI

COUNTY OF _____

SWORN AND SUBSCRIBE before me this the ____ day of _____
2022.

NOTARY PUBLIC

My Commission Expires:

RETURN OF SERVICE

I, _____, process server, do hereby certify that I am not a party to the above-captioned civil action, am not less than 18 years of age, and have delivered the above-and-foregoing SUBPOENA DUCES TECUM by serving a true and correct copy of same upon _____.

This the ____ day of _____ 2022.

Process Server

STATE OF MISSISSIPPI
COUNTY OF _____

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NOTARY PUBLIC

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EXHIBIT “A” TO SUBPOENA

Definitions

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“**You**” and “**Your**” refer to the University of Southern Mississippi Athletic Foundation, Inc. (“USMAF”) and its board members, officers, employees, agents, and any other person acting on its behalf.

The “**USM Volleyball Center**” refers to the facilities located on the University of Southern Mississippi campus at or around 101 M.K. Turk Circle, Hattiesburg, Mississippi 39406, which have been or are being used, in whole or in part, to serve women’s volleyball and/or women’s beach volleyball.

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- (b) “Sublease between The University of Southern Mississippi Athletic Foundation, Inc. and Mississippi Community Education Center.”

“**TANF**” is the Temporary Assistance for Needy Families program operated by the State of Mississippi in conjunction with the federal government pursuant to 42 U.S.C. §601 and Miss. Code Ann. 43-17-1, as well as other applicable provisions of federal and State law.

DOCUMENTS TO BE PRODUCED WITHIN TEN (10) DAYS

1. All Documents including, without limitation, Documents reflecting communications between You and any person or entity relating in any way to the USM Volleyball Center and/or the USM Volleyball Center Leases.
2. All Documents including, without limitation, Documents reflecting communications between You and any person or entity relating in any way to funding, in whole or in part, for the USM Volleyball Center.
3. All Documents including, without limitation, Documents reflecting communications between You and any person or entity relating in any way to pledges or promises for funding, in whole or in part, for the USM Volleyball Center.
4. All Documents relating in any way to Your conclusion prior to the date of execution of the USM Volleyball Center Leases that the USM Volleyball Center and/or the USM Volleyball Center Leases were permissible TANF expenditures and the USM Volleyball Center served a TANF purpose.
5. All Documents including, without limitation, Documents reflecting communications between You and anyone with the Attorney General's Office for Mississippi in relation to the USM Volleyball Center and/or the USM Volleyball Center Leases.
6. All Documents, including, without limitation, bank statements and other financial records identifying transactions wherein funds were received by You from any entity or person, or paid by You to any person or entity, in relation to the USM Volleyball Center and/or the USM Volleyball Center Leases.