

**SUBPOENA DUCES TECUM (CIVIL CASE)**

Rule 4:9(c) Case No. Chancery 53360 .....

Prince William County ..... Circuit Court

9311 Lee Avenue, Manassas, VA 20110-5555  
ADDRESS

(703) 792-6029.....  
TELEPHONE NUMBER

Cheri Smith..... V. Wesley Smith.....  
**CUSTODIAN:** **REQUESTING PARTY:**

Loretta Vardy..... Wesley Smith.....

12388 Silent Wolf Dr.....

Manassas VA 20110.....

(703) 919-1417.....

**TO:** Sheriff of Prince William County, VA..... or any authorized officer:  
You are commanded to serve this Subpoena Duces Tecum on the Custodian.

**TO THE CUSTODIAN:**

You or someone acting in your behalf are commanded to produce the documents and tangible things designated and described  in the attached request  below for issuance of this Subpoena Duces Tecum as follows:

ITEMS TO BE PRODUCED:

.....  
.....  
.....

CONTINUED ON REVERSE SIDE

Documents are to be delivered on:

..... at ..... to this court at the above address.

5 pm. May 27, 2005 ..... or before to:

the Clerk's office of this court at the above address.

Wesley Smith, 5347 Landrum Rd APT 1, Dublin, VA 24084-5603.....

Tangible things are to be:

made available to the REQUESTING PARTY at..... for

..... to permit such party or someone acting in his behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

delivered to this court at the above address on.....

OTHER TERMS: .....

You are further commanded to appear in person before this Court at the date and time shown above with the documents and/or tangible things subpoenaed by this Subpoena Duces Tecum and to be ready to testify in response to questions concerning these items.

**WARNING:** Failure to comply with the terms of this Subpoena Duces Tecum may result in your being fined or jailed for contempt of court.

.....  
DATE

..... Clerk  
by .....  
DEPUTY CLERK

## ITEMS TO BE PRODUCED:

1. All Correspondence, electronic or otherwise, that references any of the following:

Cheri Smith, Liam Smith, Wesley Smith, or Igor Bakhir

(Excluding correspondence sent only to your client Cheri Smith if covered by attorney/client privilege)

2. Notes of any incidents or observations related to Cheri Smith, Liam Smith, Wesley Smith, or Igor Bakhir.

3. Notes of any conversations, with any person, related to Cheri Smith, Liam Smith, Wesley Smith, or Igor Bakhir.

(Excluding notes of conversations with Cheri Smith that if covered by attorney/client privilege)

4. All documents, electronic or otherwise, reports, evaluations, or evidence, photo's, etc provided to Loretta Vardy in reference to this case

5. All documents, electronic or otherwise, that indicates any education or training related to determining the best interests of the child.

6. All documents, electronic or otherwise, that indicates billing and/or time spent by Loretta Vardy on this case, including retainer agreement.

7. All documents, electronic or otherwise, that indicates billing and/or time spent by anyone consulted about this case.

8. All documents, electronic or otherwise, that indicates any education or training related to diagnosing mental health problems.

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**RETURN OF SERVICE**