

**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:**

Custodian of Records – Fairfax County Public Schools..... Wesley Smith .....

10700 Page Avenue.....

Fairfax, Virginia 22030.....

703-246-3646.....

**TO:** Sheriff of Prince William County or Fairfax 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:

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.....  
.....

CONTINUED ON REVERSE SIDE

Documents are to be delivered on:

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

5 pm. Oct 1, 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: Contact me at [liamsdad@liamsdad.org](mailto:liamsdad@liamsdad.org) if you have questions about exactly which documents are needed or if the number of documents is large and you want to arrange to provide a subset of them. ....

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 documents, electronic or otherwise, that detail school policy and/or procedures concerning non-custodial parents, access to school events and/or trespassing, including both school district wide policies as well as local cluster/school policy that apply to Spring Hill Elementary that were in place June 17, 2005.
2. All documents, electronic or otherwise, that document the "Red Flag" policy/procedure referred to by Roger Vanderhye, in his court testimony on Aug 8, 2005 including both school district wide policies as well as local cluster/school policy that apply to Spring Hill Elementary that were in place June 17, 2005.
3. All documents, electronic or otherwise, of any school policy/procedure that indicates a principal does not need to comply with school regulation 2240.3 and/or state law 22.1-4.3.
4. All documents, electronic or otherwise sent to Wesley Smith advising him he would be charged with trespassing if he attended any events at school.
5. All court orders, electronic or otherwise, the school believes prevent Wesley Smith from having contact with his son Liam or preventing him from attending school activities.
6. All correspondence, electronic or otherwise where any school employee or board member claimed that orders in item 5 above exist.
7. All documents, electronic or otherwise concerning scheduling of IEP and/or parent/teacher meetings and notifications of such meetings for Liam Smith.
8. All correspondence, electronic or otherwise, that references any of the following:  

Cheri Smith, Liam Smith, Wesley Smith, or Igor Bakhir
9. Notes of any incidents or observations related to Cheri Smith, Liam Smith, or Wesley Smith.
10. Notes of any conversations, with any person, related to Cheri Smith, Liam Smith, Wesley Smith, or Igor Bakhir.
11. All documents, electronic or otherwise that describe any signs, fencing or other steps taken to prevent the general public from using the field next to the school, or to make the public aware it is school property.
12. All training materials, electronic or otherwise, relating to school regulation 2240.3 and/or state law 22.1-4.3.

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**RETURN OF SERVICE**