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01-CV-2021-902121.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
JACQUELINE ANDERSON SMITH, CLERK

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

MATRIX, LLC,	)	
	)	
Plaintiff,	)	
	)	**CIVIL ACTION NUMBER:**
v.	)	**01-CV-2021-902121.00**
	)	
CANOPY PARTNERS, LLC; TMP INTERACTIVE LLC; JEFF PITTS; GREG GILBERT; ABIGAIL MACIVER; APRIL ODOM; and FICTITIOUS DEFENDANTS ONE, TWO and THREE,	)	
	)	
Defendants.	)	

NOTICE OF INTENT TO SERVE SUBPOENA ON NON-PARTY

TAKE NOTICE that upon the expiration of fifteen (15) days from the date of service of this notice, Defendants Canopy Partners, LLC and TMP Interactive, LLC, will apply to the Clerk of this Court for issuance of the attached subpoena directed to:

Tommy Kirkland
c/o The Matrix, LLC
644 S. Perry St.
Montgomery, AL 36104

Said subpoena will require the production of documents or things at the time and place specified in the subpoena.

Respectfully submitted this 10th day of August, 2022.

/s/ Bruce F. Rogers
Bruce F. Rogers

BAINBRIDGE, MIMS, ROGERS & SMITH, LLP
SouthState Bank Building
600 Luckie Drive, Ste. 415
Birmingham, Alabama 35223
Telephone: (205) 879-1100
Facsimile: (205) 879-4300
E-Mail: brogers@bainbridgemims.com

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Albert L. Vreeland, II
Lehr Middlebrooks Vreeland & Thompson, P.C.
P.O. Box 11945
Birmingham, Alabama 35203
(205) 323-9266
avreeland@lehrmiddlebrooks.com

Byron R. Perkins, Esq.
Perkins-Law, LLC
950 22nd Street N, Ste 825
Birmingham, Alabama 35203-5300
(205) 558-4696
bperkins@perkins-law.com

Jeffrey P. Mauro, Esq.
2100 Southbridge Parkway, Ste B380
Birmingham, Alabama 35209-1393
(205) 994-6384
jpm@jeffmaurollc.com

Attorneys for Defendants Canopy Partners, LLC and TMP Interactive, LLC.

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CERTIFICATE OF SERVICE

I hereby certify that on August 10, 2022, a copy of the above and foregoing document has been filed with the Court's CM/ECF system, which will serve a copy on all counsel of record.

Cason M. Kirby, Esq.
Andrew P. Campbell
CAMPBELL PARTNERS, LLC
505 20th Street North
Suite 1600
Birmingham, Alabama 35203
Telephone: (205) 224-0752
cason@campbellpartners.com
andy@campbellpartners.com

/s/ Bruce F. Rogers
OF COUNSEL

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EXIBIT A TO CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45

TO: Tommy Kirkland
c/o The Matrix, LLC
644 S. Perry St.
Montgomery, AL 36104

You are hereby noticed of the following request of the Defendants Canopy Partners, LLC and TMP Interactive, LLC, to produce and permit said Defendants to inspect and copy each of the following documents from 2012 to 2022 (including electronic communications) within fifteen (15) days after service of this subpoena on you:

1. All records of payments from and/or concerning any C4's either personal or by entities owned or related to Tommy Kirkland from 2015 through 2020.

2. All communications between and documents related to Jason Garcia, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

3. All communications between and documents related to the Orlando Sentinel, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

4. All communications between and documents related to Michael Barfield, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

5. All communications between and documents related to Megan Rondini, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

6. All communications between and documents related to Mike Rondini, including but not limited to emails, memoranda, letters, facsimiles,

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handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

7. All communications between and documents related to The Rondini Family, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.
8. All communications between and documents related to Jason Garcia, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

9. All communications between and documents related to Leroy Maxwell, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

10. All communications between and documents related to the Maxwell Law Firm, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

11. All communications between and documents related to Donald Watkins, including but not limited to emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials.

12. For Requests 4 through 10 include all communications or documents related to the following:
    a. Terry Bunn,
    b. T.J. Bunn, Jr., a/k/a "Sweet T",
    c. Tuscaloosa County Sheriff Deputies,
    d. Tuscaloosa Police Investigator Adam Jones,
    e. Any current or former Tuscaloosa County Sheriff Deputies or City Investigators,
    f. Mayor Walt Maddox,
    g. Work product from digital records regarding Jeff Pitts work in Florida and/or the Florida Power & Light binder,
    h. Preparing information regarding same documents to be distributed to Florida media,
    i. Billy Canary,

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j. Leura Canary, and
k. Mike Hubbard

Such production and inspection is to take place where the documents or things are regularly kept or at some reasonable place designated by you. The other parties to this action have the right to be present at the time of such production or inspection.

You may comply with this subpoena by mailing or delivering copies of the requested documents to Bruce F. Rogers, Bainbridge, Mims, Rogers & Smith, LLP, The SouthState Bank Building, 600 Luckie Drive, Suite 415, Birmingham, AL 35223. These documents may also be provided via email to brogers@bainbridgemims.com. Defendant agrees to pay for the reasonable cost of making the copies sent, but please inform us if the reasonable charges will exceed $100.00.

NOTE: As required by A.R.C.P. 45(a)(1)(D), the text of subdivision (c) and (d) of A.R.C.P. 45 are included in this Court's required subpoena form that will be issued in this case.

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