

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

MATRIX, LLC, )  
)  
Plaintiff, )  
)  
v. )  
)  
CANOPY PARTNERS, LLC; TMP )  
INTERACTIVE LLC; JEFF PITTS; )  
GREG GILBERT; ABIGAIL MACIVER; )  
APRIL ODOM; and FICTITIOUS )  
DEFENDANTS ONE, TWO and THREE, )  
)  
Defendants. )

CIVIL ACTION NUMBER:  
01-CV-2021-902121.00

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:

John Glenn  
c/o Alabama Political Reporter  
151 Norton Homestead Road  
Attalla, AL 35954

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

Respectfully submitted this 10<sup>th</sup> day of August, 2022.

/s/ Bruce F. Rogers  
Bruce F. Rogers

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

**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**  
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/s/ Bruce F. Rogers  
OF COUNSEL

**EXHIBIT A TO CIVIL SUBPOENA FOR PRODUCTION OF DOCUMENTS**  
**UNDER RULE 45**

**TO: John Glenn**  
**c/o Alabama Political Reporter**  
**151 Norton Homestead Road**  
**Attalla, AL 35954**

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 (including electronic communications) within fifteen (15) days after service of this subpoena on you:

1. All records of any payments to or from you and your employer and entities owned or related to Joe Perkins including but not limited to Matrix LLC, Perkins Communications, P & K Consulting, and Perkins Property, including monthly retainer or other contractual payments and any "special workorders" from 2015 through 2020.
2. All communications between Alabama Political Reporter and Yellowhammer News and Joseph Perkins, Matrix, LLC, or any of Matrix's employees or agents from 2015 through 2020.
3. Any other emails, memoranda, letters, facsimiles, handwritten notes, electronic files, text messages, invoices, phone recordings, and all other materials relating to Matrix, LLC, Dr. Joseph Perkins, Canopy Partners, LLC, or Jeff Pitts from 2015 through 2020.

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](mailto: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.