



Subpoena Processing Department  
P.O. Box 29728  
MAC# S3928-020  
Phoenix, AZ 85038-9728

10/1/2010

Via Facsimile (763)417-9112  
& Regular US Mail

Jill Clark  
Jill Clark P.A.  
2005 Aquila Ave. N.  
Golden Valley, MN 55427

|                        |                    |
|------------------------|--------------------|
| <b>Re:</b>             | <b>Subpoena</b>    |
| <b>Bank Reference:</b> | <b>1283907</b>     |
| <b>Case No.:</b>       | <b>27CV1020167</b> |
| <b>Case Name:</b>      | <b>Jerry Moore</b> |

Dear Ms. Clark,

This above referenced legal order addressed to Wells Fargo Bank Minnesota, N.A., has been referred to me for response.

The records requested do not belong to the subpoenaed witness. As such, a legal order directed to the appropriate entity is required to compel the production of those records.

If you have questions, you may contact me at (480) 724-2000.

Sincerely,

A handwritten signature in cursive script that reads "Rhonda Racine".

Rhonda Racine  
Subpoena Processing Representative  
Hours of Operation: 8:30a.m. to 5:00 p.m. MST (no Daylight Savings Time)

Cc:

State of Minnesota  
County of Hennepin

District Court

|                    |                |
|--------------------|----------------|
| Judicial District: | Fourth         |
| Court File Number: | 27-cv-10-20167 |
| Case Type:         | Conspiracy     |

Melony Michaels and John Foster,  
Plaintiffs,

and

First USA Title, LLC, et al,  
Defendants.

SUBPOENA IN A CIVIL CASE  
(COMMAND TO APPEAR)  
Minn. R. Civ. Pro. 45

444747  
ILAN 9/29/10  
9544  
In Person  
Josh Melnik

TO: WELLS FARGO BANK, MINNESOTA, N.A.  
Name Address

You are commanded to appear as a witness in the district court to give testimony at the place, date, and time specified below.

|                    |               |
|--------------------|---------------|
| Place of Testimony | Courtroom     |
|                    | Date and Time |

You are commanded to appear at the place, date and time specified below to testify at the taking of a deposition in the above case.

|                     |               |
|---------------------|---------------|
| Place of Deposition | Date and Time |
|---------------------|---------------|

XX You are commanded to produce and permit inspection and copying of the listed documents or objects at the place, date and time specified below (attach list of documents or objects if necessary): See Schedule A

|  |  |
|--|--|
| Place: Jill Clark, P.A.<br>2005 Aquila Av. N.<br>Golden Valley, MN 55427 | Date and Time:<br>Wednesday, October 6, 2010, noon |
|--|--|

You are commanded to permit inspection of the following premises at the date and time specified below.

|          |               |
|----------|---------------|
| Premises | Date and Time |
|----------|---------------|

NOTE: FAILURE TO OBEY A SUBPOENA WITHOUT BEING EXCUSED IS A CONTEMPT OF COURT.

|   |  |
|---|--|
| Signature of Court Administrator / Plaintiff's Attorney / Defendant's Attorney (Circle) | Date<br>9/26/10                          |
| Name, Address and Phone Number (if issued by Attorney as an Officer of the Court)       | SEAL (if issued by Court Administration) |

09-29-10 10:29 IN

Wells Fargo Schedule A

763/47-9102

Documents that Wells Fargo must provide to Jill Clark, P.A. (please call Jill Clark if you do not understand any of the requests herein) all documents requested are for 2010:

1. The entire personnel file of Jerry Moore, which includes any and all documents relating to the employment of Jerry Moore, wherever kept, including but not limited to the following files (which means the documents inside those files (whether they are paper or electronic), as well): a) the official personnel file locate in human resources; b) any "supervisor" file (direct supervisor, or others, any "unofficial" HR file, but including notes of discussions, notes of meetings, references, etc.); c) any and all investigative files (very specifically including the investigative file regarding the investigation that was conducted just before the termination of Jerry Moore); d) benefits; e) hiring; and f) termination.
2. All emails, notes, text messages, Facebook messages, intra-bank electronic communications/messages (by whatever name), phone messages, notes, relating to Jerry Moore, any complaints about Jerry Moore, or any investigation of Jerry Moore;
3. All documents (including communications, and including electronic documents) about Jerry Moore (or containing allegations about Jerry Moore) received from outside Wells Fargo (that is, a non-employee of Wells Fargo) or inside Wells Fargo;
4. All documents showing who communicated to Wells Fargo about Jerry Moore, just before the investigation that preceded his termination. This includes, but is not limited to phone messages, emails, text messages, documents mailed or hand-delivered, notes, notes of investigators, meeting notes;
5. Documents showing who from Wells Fargo called the City Pages and/or Andy Mannix, about Jerry Moore no longer working at Wells Fargo. Documents provided to City Pages or Andy Mannix;
6. Emails about Jerry Moore (and referencing Jerry Moore, even if not by name) to and/or from: Diane Johnson, Benjamin Bremer, Angie Dahle, Ashley Day, Paul Jarvis; or others with/in Wells Fargo (but could be to/from outside Wells);
7. Documents showing the names of the 2 investigators who interviewed Jerry Moore as well as any of their files, notes, emails, text messages, phone messages, etc.;
8. Documents showing whether, when, and/or why Don or Sandra Samuels (or any agent of Don Samuels, whether official or unofficial agent (including a friend inside Wells Fargo), including a representative of the Peace Foundation) contacted Wells Fargo about Jerry Moore;
9. Copy of the company's Code of Ethics policy, and all documents supporting the claim that Jerry Moore violated such policy.



WELLS FARGO SERVICES  
SUBPOENA PROCESSING DEPARTMENT  
P.O. Box 29728 - MAC #S3928-020  
Phoenix, AZ 85038

**Fax Cover Sheet**

**October 1, 2010**

To: Jill Clark  
Jill Clark P.A.

Fax #: (763) 417-9112

From: Rhonda Racine

Phone #: (480) 724-2000  
Fax # (480) 724-5115

# of pages (including) this cover sheet: 4

**Re: Subpoena #1283907**

**CAUTION: THE INFORMATION CONTAINED IN THIS FACSIMILE MESSAGE IS CONFIDENTIAL AND INTENDED SOLELY FOR THE USE OF THE INDIVIDUAL OR ENTITY NAMED ABOVE. IF THE READER OF THIS MESSAGE IS NOT THE INTENDED RECIPIENT, OR THE EMPLOYEE OR AGENT RESPONSIBLE FOR DELIVERING IT TO THE INTENDED RECIPIENT, YOU ARE HEREBY NOTIFIED THAT ANY DISSEMINATION, DISTRIBUTION, COPYING OR UNAUTHORIZED USE OF THIS COMMUNICATION IS STRICTLY PROHIBITED.**

**IF YOU HAVE RECEIVED THIS FACSIMILE IN ERROR, PLEASE NOTIFY THE SENDER IMMEDIATELY BY TELEPHONE, AND RETURN THE FACSIMILE TO THE SENDER AT THE ABOVE ADDRESS VIA THE UNITED STATES POSTAL SERVICE. THANK YOU.**

If you did not receive all of the pages, or have any problems, please call the above phone number as soon as possible.