

UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION

UNITED STATES OF AMERICA

-vs-

RICHARD F. SCRUGGS  
THE SCRUGGS LAW FIRM, P.A.

CR-07-CO-0325-S

**SUBPOENA**

SUBPOENA TO:           Custodian of Records  
                              The Scruggs Law Firm  
                              120-A Courthouse Square  
                              Oxford, MS 38655

- 1) Copies of all correspondence and/or e-mails from The Scruggs Law Firm, including its branch offices, to Jim Hood, Courtney Schloemer or other representative of the Office of the Attorney General of Mississippi, that in any way relates to or concerns:
  - a) The *Renfroe v. Rigsby* lawsuit;
  - b) Judge Acker's Orders in said case;
  - c) The State Farm or Renfroe documents taking by Cori Rigsby or Kerri Rigsby that are the subject of *Renfroe v. Rigsby*;
  - d) The delivery of the documents or copies of said documents in December, 2006;
  - e) The delivery of the documents or copies of said documents in June, 2006;

- f) The delivery of the documents or copies of said documents any time prior to June 2006.
- 2) Copies of all correspondence and/or e-mails from The Scruggs Law Firm, including its branch offices to the Office of the United States Attorney for the Southern District of Mississippi, the Department of Justices or its Co-Counsel firm in the qui tam suit referred in (h) below, that in any way concern:
- a) The *Renfroe v. Rigsby* lawsuit;
  - b) Judge Acker's Orders in said case;
  - c) The State Farm or Renfroe documents taken by Cori Rigsby or Kerri Rigsby that are the subject of *Renfroe v. Rigsby*;
  - d) The delivery of the documents or copies of said documents in December, 2006;
  - e) The delivery of the documents or copies of said documents in June, 2006;
  - f) The delivery of the documents or copies of said documents any time prior to June 2006;
  - g) The evidentiary submission prior to April 28, 2006 as referenced in the Complaint filed in United States of America, Ex Rel Cori Rigsby and Kerri Rigsby v. State Farm Mutual Insurance Co., et al., 1:06 CV 433;
  - h) The evidentiary submission dated December 8, 2006 as referenced in the Amended Complaint filed in United States of America, Ex Rel Cori Rigsby and Kerri Rigsby v. State Farm Mutual Insurance Co., et al., 1:06 CV 433.
- 3) Copies of all Consulting Agreements, Employment Contracts and/or Legal Services Agreements and Indemnity Agreements between The Scruggs Law Firm and Kerry Rigsby and/or Cori Rigsby and all correspondence, emails, or notes between the Defendants and either Rigsby sister or their mother, Pat

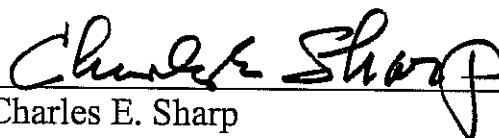
Loblano, prior to February 2006 when they claim the Defendants were hired as their attorneys.

- 4) Copies of all pay records, reimbursement records and canceled checks payable by The Scruggs Law Firm to Kerri Rigsby and/or Cori Rigsby from October 1, 2005 to the present.
- 5) Copies of all Scruggs Law Firm phone bills including cell phone bills in November and December 2006 and January and February 2007 reflecting calls with the Office of the Attorney General of Mississippi and/or Jim Hood or Courtney Schloemer and/or with Greg Hawley or Katherine Brown and/or White, Arnold, Andrews & Dowd, P. C. (205-3232-1888). NOTE: Calls to others may be redacted.
- 6) Copies of all Scruggs Law Firm phone bills including cell phone bills from October 1, 2005 to March 1, 2006 reflecting calls between Cori Rigsby, Kerri Rigsby and/or Patricia Loblano and The Scruggs Law Firm.
- 7) Copies of all Scruggs Law Firm phone bills including cell phone bills in May and June 2006 reflecting calls with the Office of the Attorney General of the State of Mississippi.
- 8) All e-mails, correspondence, memos, notes or other writings including telephone bills reflections communications between The Scruggs Law Firm

and ABC News, relating in any way to the eventual ABC 20/20 television broadcast in August 2006.

- 9) Copies of all correspondence and electronic transmissions between the Scruggs Law Firm and others, including but not limited to, other law firms, concerning in any way the distribution and copying or return of the purloined documents in question or discussion of the same or the events in question requiring the return of the documents .
- 10) Copies of all canceled checks payable by recipient to White, Arnold, Andrews & Dowd, P.C. and other law firms representing the Rigsbys paid for by the Defendants.
- 11) Copies of all correspondence and/or emails from or to The Scruggs Law Firm and White, Arnold, Andrews & Dowd, P.C. and any other firm representing the Rigsbys paid for by the Defendants. [Note: If any privilege is claimed, a privilege log is requested].
- 12) The Defendant's firm is further directed to allow a computer expert selected by the United States and at the United States' expense, to make a forensic clone or mirror image copy of the hard drives in use from September 1, 2005 through the present, of the computers, laptops and Blackberries, or other electronic devices, at The Scruggs Law Firm, P.A., for emails and

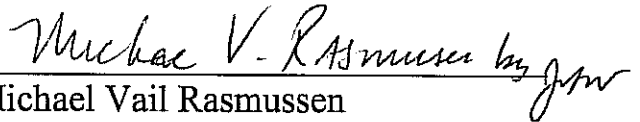
correspondence on computers used by members of the firm, including those personally used by Richard F. Scruggs, Zach Scruggs, Sid Backstrom and their secretaries, and for evidence of copies or downloads or electronic storage of the purloined documents in question, as such hard drives are expected to contain material, admissible, documents, including some of the documents requested in the preceding subpoena requests. To the extent that these are claims of privilege, the Court is requested to appoint an independent ombudsman, at no expense to the Defendants, to identify the material electronic documents, and the Court is requested to direct the Defendant to provide a privilege log for any transmissions for which the Defendant claims a privilege.



Charles E. Sharp  
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Sadler ♦Sullivan, P.C.  
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Joel A. Williams  
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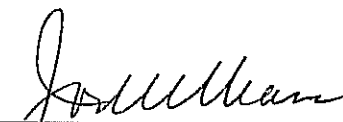
for   
Michael Vail Rasmussen

Special Prosecutor on behalf of the  
United States of America  
1122 22<sup>nd</sup> Street North  
Birmingham, Alabama 35242

**CERTIFICATE OF SERVICE**

I hereby certify that on the 16<sup>th</sup> day of January 2008, I electronically filed the foregoing **SUBPOENA** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Counsel of Record

  
OF COUNSEL