

**IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT
DUPAGE COUNTY, ILLINOIS, LAW DIVISION**

GRETCHEN WILKINSON, <i>et al.</i> ,)	
)	Case No. 15 L 000980
Plaintiffs,)	
)	
v.)	
)	
INSTITUTE IN BASIC LIFE PRINCIPLES, INC.,)	
and WILLIAM W. GOTHARD, <i>et al.</i> ,)	
)	
Defendants.)	


NOTICE OF SUBPOENA

TO: SEE ATTACHED SERVICE LIST

PLEASE TAKE NOTICE that I caused to be filed, with the Clerk of the Circuit Court of DuPage County, Wheaton, Illinois, ***Subpoena Duces Tecum***, and hereby serve upon you copies of the same.

Respectfully submitted,
INSTITUTE IN BASIC LIFE PRINCIPLES, INC.


Shawn M. Collins
shawn@collinslaw.com
Robert L. Dawidiuk
rdawidiuk@collinslaw.com
Jeffrey M. Cisowski
jcisowski@collinslaw.com
The Collins Law Firm, P.C.
1770 Park Street, Suite 200
(630) 527-1595
Firm No. 24048

By: 

One of its Attorneys

CERTIFICATE OF SERVICE

I, Robert L. Dawidiuk, an attorney, certify that I served a true and correct copies of the *Subpoena Duces Tecum*, along with this *Notice*, to the counsel named on the attached Service List via E-Mail Delivery before 5:00 p.m. on January 17, 2018.



Robert L. Dawidiuk

SERVICE LIST

Glenn R. Gaffney
Jolianne S. Walters
GAFFNEY & GAFFNEY, PC
1771 Bloomingdale Road
Glendale Heights, IL 60139
glenn@gaффneylawpc.com
jolianne@gaффneylawpc.com

Frank V. Cesarone
Peter J. Flowers
MEYERS & FLOWERS, LLC
3 North Second Street, Suite 300
St. Charles, Illinois 60174
fvc@meyers-flowers.com
pjf@meyers-flowers.com

Mark P. Bryant
Joseph B. Roark
Emily Ward Roark
BRYANT LAW CENTER, PSC
P.O. Box 1876
Paducah, Kentucky 42001
mark.bryant@bryantpsc.com
joe.roark@bryantpsc.com
emily.roark@bryantpsc.com

Robert T. Kuehl
KUEHL LAW, P.C.
401 N. Michigan Ave., Suite 1200
Chicago, IL 60611
bob@kuehl1lawpc.com

David G. Bryant
DAVID BRYANT LAW, PLLC
600 W. Main Street, Suite 100
Louisville, KY 40202
david@davidbryantlaw.com

STATE OF ILLINOIS **UNITED STATES OF AMERICA** **COUNTY OF DU PAGE**
IN THE CIRCUIT COURT OF THE EIGHTEENTH JUDICIAL CIRCUIT

Gretchen Wilkinson, et al.

vs

Institute in Basic Life Principles
and William W. Gothard, Jr.

2015 L 000980

CASE NUMBER

**SUBPOENA
DUCES TECUM**

File Stamp Here

TO: John Underwood

4664 American Avenue Bakersfield, CA 93309

GREETINGS:

YOU ARE HEREBY COMMANDED to personally appear before the Eighteenth Judicial Circuit Court of DuPage

County at the ☒ DuPage Judicial Center, 505 North County Farm Road, Wheaton, Illinois



before Judge Popejoy in Room 2020 on February 15, 2018 at 9 a.m.

and produce at the time and place aforesaid the following documents or tangible things which constitute evidence relating to the said cause and which are listed below

See attached Rider

and then and there testify, and the truth to speak concerning those things of which you may have knowledge, and the import of such documents or tangible things concerning the above captioned cause now pending and undetermined in the Eighteenth Judicial Circuit Court on the part of Institute in Basic Life Principles

**YOUR FAILURE TO COMPLY WITH THIS SUBPOENA MAY SUBJECT YOU
TO PUNISHMENT FOR CONTEMPT OF COURT**

NOTICE TO WITNESS

The attorney who has requested this subpoena is listed herein. Any questions regarding your knowledge of the subject matter or testimony in the case should be directed to your attorney.

DO NOT CALL THE CIRCUIT COURT CLERK

Name: Robert L. Dawidiuk

DuPage Attorney Number: 24048

Attorney for: Institute in Basic Life Principles

Address: 1770 Park Street, Suite 200

City/State/Zip: Naperville, IL 60563

Telephone Number: 630-527-1595

Email: rdawidiuk@collinslaw.com

WITNESS:

CHRIS KACHIROUBAS, Clerk of the Eighteenth
Judicial Circuit Court and the seal thereof, Wheaton,
Illinois
Date 01/11/2018

Chris Kachirobas
CHRIS KACHIROUBAS, Clerk

Date

By KELLY SURGES
Deputy Clerk

Clerk of the Eighteenth Judicial Circuit
4193071

**CHRIS KACHIROUBAS, CLERK OF THE 18th JUDICIAL CIRCUIT COURT ©
WHEATON, ILLINOIS 60187-0707**

SHERIFF'S FEES

Service and return \$ _____

Miles \$ _____

Total \$ _____

Sheriff of _____ County

SHERIFF'S RETURN

I certify that I served this subpoena on defendant as follows:

☐(a) (Individual - **personal**):

By leaving a copy and a copy of the subpoena with each individual as follows:

☐(b) (Individual - **abode**):

By leaving a copy and a copy of the subpoena at the usual place of abode of each individual with a person of his family, of the age of 13 years or upwards, informing that person of the contents of the subpoena, and also by sending a copy of the subpoena and the interrogatories in a sealed envelope with postage fully prepaid, addressed to each individual at the usual place of abode, as follows:

☐

(c) (Corporation):

By leaving a copy and a copy of the subpoena with the registered agent, officer, or agent of each corporation as follows:

☐

(d) (Other service):

☐

(e) (Unable to Serve):

By _____, Deputy Badge Number: _____

Name of Defendant _____

Name of Defendant _____

Name of Person
summons given to _____Name of Person
summons given to _____

Sex _____ Race _____ Aprox. age _____

Sex _____ Race _____ Aprox. age _____

Place of service _____

Place of service _____

City, State _____

City, State _____

Date of service _____ Time _____

Date of service _____ Time _____

Date of Mailing _____

Date of Mailing _____

Sheriff of _____ County

Special Process Server of _____

County Illinois License # _____

By _____

I served this subpoena by delivering a copy to _____

and I paid the witness \$ _____ for witness and mileage fees.

SignatureSubscribed and Sworn before me _____
Date_____
Notary Public

AFTER SERVICE, THE ORIGINAL MUST BE FILED WITH THE CIRCUIT COURT CLERK ALONG WITH THE ENDORSEMENT OF SERVICE

CHRIS KACHIROUBAS, CLERK OF THE 18th JUDICIAL CIRCUIT COURT ©
WHEATON, ILLINOIS 60187-0707

RIDER TO UNDERWOOD SUBPOENA

1. DEFINITIONS.

Terms used in this rider shall have the following meaning:

(a) **IBLP.** The term “IBLP” shall mean and refer to Defendant Institute in Basic Life Principles, Inc., including any of its schools, training centers, affiliates or related entities, and any or all of its employees, officers, directors, agents or persons acting at its discretion or on its behalf.

(b) **Gothard.** The term “Gothard” shall mean and refer to Defendant William Gothard, Jr. and his agents or persons acting at his direction or on his behalf.

(c) **Recovering Grace.** The term “Recovering Grace” shall refer to the online organization with an internet presence on recoveringgrace.org/, on Twitter at [@RecoverGrace](https://twitter.com/RecoverGrace), and on Facebook at facebook.com/recovergrace.

(d) **Administrator.** The term “Administrator” refers to any individual with the ability to post, Tweet, edit, remove, delete, store, or change online content for any internet presence including but not limited to websites, or profiles or accounts on social media platforms.

(e) **Communication.** The term “Communication” shall mean and refer to both written exchanges, including those in digital format, between any person or persons or entities including, but not limited to, verbal conversations, telephone calls, letters, memoranda, reports, telegrams, exhibits, e-mails, website posts, text messages, social media posts of any type including but not limited to the following: Facebook messages, Tweets and re-Tweets, direct messages on Twitter, direct messages on Instagram, messages on Skype, and messages on other social media platforms, drawings and any other documents as earlier defined which conform or relate to the communication.

(f) **Document.** The term “Document” shall mean and include, without limitation, any kind of written, electronic or graphic material, however produced or reproduced, of any kind or description, and all copies thereof which are different in any way from the original (whether by interlineations, receipt stamp, notation, indication of copy received or otherwise). “Document” shall also mean and include, but not be limited to, all letters, correspondence, memoranda, notes, diaries, emails, text messages, Facebook messages, Tweets and re-Tweets, direct messages on Twitter, direct messages on Instagram, and other social media messages, Skype or other instant messaging communications, internet postings, internet message board postings, minutes of meetings, payrolls, bills, telex messages, inter-office and intra-office communications, transcripts, recordings of telephone conversations or other communications, schedules, tables, charts, reports, books, ledgers, drawings, diagrams, exhibits, models, sketches, photographs, contracts, subcontracts, and any and all writings, typings, printings, drafts, or reproductions of them, irrespective of the form.

(g) **You or Your.** The term “You” or “Your” shall mean and refer to John Underwood individually.

(h) **Relating to or Related to.** “Relating to” or “related to” shall mean anything which, directly or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any way, is or was used in the preparation or, appended to, legally, logically or factually connected with, proves, disproves, or tends to prove or disprove.

(i) **Engagement Agreement.** The term “Engagement Agreement” shall mean and refer to any contract or understanding of representation you have with any Plaintiff the lawsuit captioned

Gretchen Wilkinson, et al vs. Institute in Basic Life Principles and William W. Gothard Jr., 15-L-000980 in DuPage County, Illinois.

2. DIRECTIONS.

(a) Provide responsive Documents and Communications via United States Mail by February 15, 2018.

(b) The relevant time period for your response shall be January 1, 2010 to the present.

(c) For all Documents and Communications which are withheld on the basis of work product or privilege of any kind whatsoever list the Document or Communication individually and:

1. specifically state the nature of the claim of privilege;
2. state the facts relied upon in support of the claim of privilege;
3. identify any Documents or Communications related to the claim of privilege;
4. identify all persons having any knowledge of any facts related to the claim of privilege; and
5. with regard to the Document or Communication claimed to be privileged, identify the custodian of the original document and all copies of any form thereof, and its/their present location(s).

3. REQUESTS.

(a) Provide all Documents and Communications in Your possession or control relating to the lawsuit captioned *Gretchen Wilkinson, et al vs. Institute in Basic Life Principles and William W. Gothard Jr.*, 15-L-000980 in DuPage County, Illinois, or the issues raised therein.

(b) Provide all Documents and Communications You or Recovering Grace have exchanged with any Plaintiff in the lawsuit captioned *Gretchen Wilkinson, et al vs. Institute in Basic Life Principles and William W. Gothard Jr.*, 15-L-000980 in DuPage County, Illinois.

(c) Provide all Documents in Your possession or control which evidence your status as an Administrator of any online presence with content related to IBLP or Gothard.

(d) Provide all Documents and Communications in Your possession or control, for both open and closed groups, from any online presence with content related to IBLP or Gothard, including but not limited to:

- (i) communications in the “R2D2 Group” Facebook group/page;
- (ii) communications in the “ATI Student Survivors” a/k/a “ATI SS” Facebook group/page;
- (iii) communications in the “BG Girls” Facebook group/page;
- (iv) and the “Crossings” message boards; and
- (v) any other secret groups, Facebook messages, Facebook posts, Google chats, Skype messages, Twitter direct messages, and Instagram direct messages.

(e) Provide a copy of any Engagement Agreement, contract, or communication you have had with any Plaintiff in the lawsuit captioned *Gretchen Wilkinson, et al vs. Institute in Basic Life Principles and William W. Gothard Jr.*, 15-L-000980 in DuPage County, Illinois, which evidences your representation of said Plaintiff.

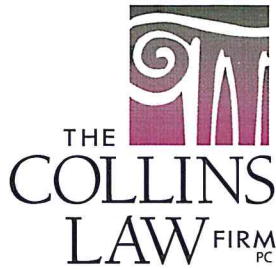
CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true and correct copy of the foregoing Subpoena Duces Tecum was served upon John Underwood pursuant to the California Interstate and International Depositions and Discovery Act (Cal. Civ. P. § 2029.300) on January 11, 2018.

Shawn M. Collins
Robert L. Dawidiuk
Jeffrey M. Cisowski
THE COLLINS LAW FIRM, P.C.
1770 Park Street, Suite 200
Naperville, IL 60563
630-527-1595
Firm No. 24048

Respectfully submitted,
**INSTITUTE IN BASIC LIFE PRINCIPLES,
INC.**

By: 
One of its attorneys



SHAWN M. COLLINS
ROBERT L. DAWIDIUK
EDWARD J. MANZKE

JEFFREY M. CISOWSKI
JINAH HONG
LINDSEY L. PURDY
JOHN D. RISVOLD

Of Counsel
JOHN A. SOPUCH III

Via Subpoena Service

John Underwood
4664 American Avenue
Bakersfield, CA 93309

January 10, 2018

Re: 2015 L 000980, Wilkinson et al vs. Institute in Basic Life Principles and William W. Gothard

Mr. Underwood:

Please find enclosed a subpoena duces tecum in the above-captioned matter. Please note we will accept your production via U.S. Mail to our law firm at the address below by February 15, 2018, in lieu of your appearance in DuPage County, Illinois. Be advised we will reimburse you for reasonable copying charges. Should you need an extension of time to respond or have any questions regarding the enclosed, please contact me at the information enclosed.

Sincerely,

Robert L. Dawidiuk

Enc.

RLD/llp

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): The Collins Law Firm, P.C. 1770 Park Street, Ste. 200 Naperville, IL 60563 TELEPHONE NO.: 630-527-1193 FAX NO.: 630-527-1193 E-MAIL ADDRESS: rdawidiuk@collinslaw.com ATTORNEY FOR (Name): Institute in Basic Life Principles	FOR COURT USE ONLY
Court for county in which discovery is to be conducted: SUPERIOR COURT OF CALIFORNIA, COUNTY OF Kern STREET ADDRESS: 1215 Truxton Avenue MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Bakersfield, CA 93301 BRANCH NAME:	
Court in which action is pending: Name of Court: DuPage County Circuit Court STREET ADDRESS: 505 N. Country Farm Road MAILING ADDRESS: CITY, STATE, AND ZIP CODE: Wheaton, IL COUNTRY: U.S.A.	
PLAINTIFF/PETITIONER: Wilkinson, et al DEFENDANT/RESPONDENT: Institute in Basic Life Principles, et al	CALIFORNIA CASE NUMBER (if any assigned by court): 2015 - L - 000980 BCM-18-000001
SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS IN ACTION PENDING OUTSIDE CALIFORNIA	CASE NUMBER (of action pending outside California): 2015 - L - 000980

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
John Underwood

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Robert L. Dawidiuk On (date): February 15, 2018 At (time): 9 a.m. Location (address): 505 N. County Farm Road Wheaton, IL
--

Do not release the requested records to the deposition officer prior to the date and time stated above.

- ☒ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records must be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):
See attached Rider.
- ☐ Continued on Attachment 3 (use form MC-025).
4. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):

☐ Continued on Attachment 4 (use form MC-025).

PLAINTIFF/PETITIONER: Wilkinson, et al	CASE NUMBER (of action pending outside California):
DEFENDANT/RESPONDENT: Institute in Basic Life Principles, et al	2015 - L -000980

5. If you have been served with this subpoena as a custodian of consumer or employee records under Code of Civil Procedure section 1985.6 and a motion to quash or an objection has been served on you, a court order or agreement of the parties, witnesses, and consumer or employee affected must be obtained before you are required to produce consumer or employee records.

6. ☒ Other terms or provisions from out-of-state subpoena, if any (specify):

Production of documents via United States Mail to our law firm will be accepted in lieu of your appearance in DuPage County, Illinois.

☐ Continued on Attachment 6 (use form MC-025).

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 1/12/2018

Vanessa Cofield

(TYPE OR PRINT NAME)

TERRY MCNALLY



/s/ Vanessa Cofield

(SIGNATURE OF PERSON ISSUING SUBPOENA)

COURT SERVICES SPECIALIST

(TITLE)

**PROOF OF SERVICE OF SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Subpoena for Production of Business Records In Action Pending Outside California* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

(1) ☐ were paid. Amount: \$

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's public entity employer as required by Government Code section 68097.2. The amount tendered was (specify): \$

f. Fee for service: \$

2. I received this subpoena for service on (date):

3. ☐ I also served a completed *Proof of Service of Notice to Consumer or Employee and Objection* (form SUBP-025) by personally delivering a copy to the person served as described in 1 above.

4. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional photocopier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

RIDER TO UNDERWOOD SUBPOENA

1. DEFINITIONS.

Terms used in this rider shall have the following meaning:

(a) **IBLP.** The term “IBLP” shall mean and refer to Defendant Institute in Basic Life Principles, Inc., including any of its schools, training centers, affiliates or related entities, and any or all of its employees, officers, directors, agents or persons acting at its discretion or on its behalf.

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(c) **Recovering Grace.** The term “Recovering Grace” shall refer to the online organization with an internet presence on recoveringgrace.org/, on Twitter at [@RecoverGrace](https://twitter.com/RecoverGrace), and on Facebook at facebook.com/recovergrace.

(d) **Administrator.** The term “Administrator” refers to any individual with the ability to post, Tweet, edit, remove, delete, store, or change online content for any internet presence including but not limited to websites, or profiles or accounts on social media platforms.

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(g) **You or Your.** The term “You” or “Your” shall mean and refer to John Underwood individually.

(h) **Relating to or Related to.** “Relating to” or “related to” shall mean anything which, directly or indirectly, concerns, consists of, pertains to, reflects, evidences, describes, sets forth, constitutes, contains, shows, underlies, supports, refers to in any way, is or was used in the preparation or, appended to, legally, logically or factually connected with, proves, disproves, or tends to prove or disprove.

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(c) For all Documents and Communications which are withheld on the basis of work product or privilege of any kind whatsoever list the Document or Communication individually and:

1. specifically state the nature of the claim of privilege;
2. state the facts relied upon in support of the claim of privilege;
3. identify any Documents or Communications related to the claim of privilege;
4. identify all persons having any knowledge of any facts related to the claim of privilege; and
5. with regard to the Document or Communication claimed to be privileged, identify the custodian of the original document and all copies of any form thereof, and its/their present location(s).

3. REQUESTS.

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(d) Provide all Documents and Communications in Your possession or control, for both open and closed groups, from any online presence with content related to IBLP or Gothard, including but not limited to:

- (i) communications in the “R2D2 Group” Facebook group/page;
- (ii) communications in the “ATI Student Survivors” a/k/a “ATI SS” Facebook group/page;
- (iii) communications in the “BG Girls” Facebook group/page;
- (iv) and the “Crossings” message boards; and
- (v) any other secret groups, Facebook messages, Facebook posts, Google chats, Skype messages, Twitter direct messages, and Instagram direct messages.

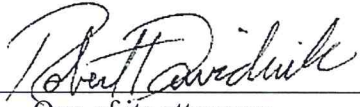
(e) Provide a copy of any Engagement Agreement, contract, or communication you have had with any Plaintiff in the lawsuit captioned *Gretchen Wilkinson, et al vs. Institute in Basic Life Principles and William W. Gothard Jr.*, 15-L-000980 in DuPage County, Illinois, which evidences your representation of said Plaintiff.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certifies that a true and correct copy of the foregoing Subpoena Duces Tecum was served upon John Underwood pursuant to the California Interstate and International Depositions and Discovery Act (Cal. Civ. P. § 2029.300) on January 11, 2018.

Shawn M. Collins
Robert L. Dawidiuk
Jeffrey M. Cisowski
THE COLLINS LAW FIRM, P.C.
1770 Park Street, Suite 200
Naperville, IL 60563
630-527-1595
Firm No. 24048

Respectfully submitted,
**INSTITUTE IN BASIC LIFE PRINCIPLES,
INC.**

By: 
One of its attorneys