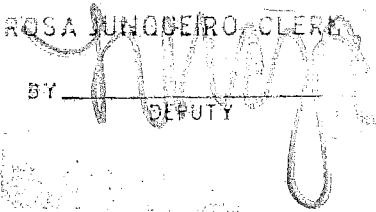


ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Joel Williams, Esq. Georgia Bar No. 365853</b> <b>3900 Frey Rd., NW, Suite 104 Kennesaw, Ga. 30144</b>  TELEPHONE NO.: <b>404-389-1035</b> FAX NO. (Optional): E-MAIL ADDRESS (Optional): <b>joel@catrialattorney.com</b> ATTORNEY FOR (Name): <b>Sandra and Kenneth Snipes</b>	FOR COURT USE ONLY  <b>17 JAN 27 PM 2:22</b>  <b>ROSA JUNQUEIRO CLERK</b>  BY  <b>DEPUTY</b>
Court for county in which discovery is to be conducted: <b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF</b> STREET ADDRESS: <b>222 E. Weber Avenue, Stockton, California</b> MAILING ADDRESS: <b>PO Box 201022</b> CITY AND ZIP CODE: <b>Stockton, California 95201</b> BRANCH NAME: <b>Stockton Courthouse</b>	
Court in which action is pending: Name of Court: <b>Superior Court of Dougherty County</b> STREET ADDRESS: <b>225 Pine Avenue, Albany, Georgia 31701</b> MAILING ADDRESS: <b>PO Box 1827</b> CITY, STATE, AND ZIP CODE: <b>Albany, Georgia 31702</b> COUNTRY: <b>USA</b>	
PLAINTIFF/PETITIONER: <b>Sandra and Kenneth Snipes</b> DEFENDANT/RESPONDENT: <b>Phoebe Putney Health System, Inc. et al.</b>	CALIFORNIA CASE NUMBER (if any assigned by court): <b>2017-61</b>
<b>DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE IN ACTION PENDING OUTSIDE CALIFORNIA</b>	CASE NUMBER (of action pending outside California): <b>15CV863-3</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
**Tiffany Becker, 6120 West Banner Road, Lot 13, Lodi, California 95242**

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in the action specified above at the following date, time, and place:

Date:	Time:	Address:
<b>Feb. 24, 2017</b>	<b>10:00AM</b>	<b>207 W. Oak St., Lodi, California 95240</b>

- a.  As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025.230.)
- b. This deposition will be recorded stenographically  through the instant visual display of testimony and by  audiotape  videotape.
2.  If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:

Continued on Attachment 2 (use form MC-025).

3. Attorneys of record in this action or parties without attorneys are (name, address, telephone number, and name of party represented):

**Joel Williams, for the Plaintiffs; 3900 Frey Rd NW, Suite 104, Kennesaw, Ga. 30144; 404-389-1035**

**Chris Foreman, for the Defendants; PO Box 2008, Albany, Ga. 31702; 229-436-1545**

Continued on Attachment 3 (use form MC-025).

PLAINTIFF/PETITIONER: Sandra and Kenneth Snipes	CASE NUMBER (of action pending outside California):
DEFENDANT/RESPONDENT: Phoebe Putney Health System, Inc. et al.	15CV863-3

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

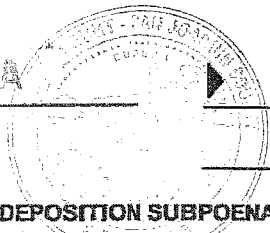
Continued on Attachment 4 (use form MC-025).

5. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

**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: JAN 27 2017

LISA VEGA  
(TYPE OR PRINT NAME)



*[Handwritten Signature]*  
(SIGNATURE OF PERSON ISSUING SUBPOENA)

LPC III  
(TITLE)

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE**

1. I served this Deposition Subpoena for Personal Appearance in Action Pending Outside California by personally delivering a copy to the person served as follows:

- a. Person served
- 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. 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. 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:

\_\_\_\_\_  
(SIGNATURE)

(For California sheriff or marshal use only)  
I certify that the foregoing is true and correct.

Date:

\_\_\_\_\_  
(SIGNATURE)

**FILED BY FAX**

FILED

IN THE SUPERIOR COURT OF DOUGHERTY COUNTY  
STATE OF GEORGIA

JAN 27 PM 2:27  
ROSA JUNQUEIRO, CLERK

BY \_\_\_\_\_  
DEPUTY

SANDRA SNIPES and  
KENNETH W. SNIPES

Plaintiffs,

v.

PHOEBE PUTNEY HEALTH  
SYSTEM, INC., AND PHOEBE PUTNEY  
MEMORIAL HOSPITAL, INC.,

Defendants.

CIVIL ACTION NO:  
15CV863-3

2017-01

**CERTIFICATE OF SERVICE**

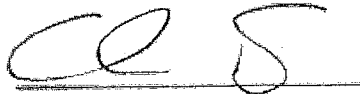
This is to certify that I have this day served a true and correct copy of the foregoing  
NOTICE TO TAKE DEPOSITION (Tiffany D. Becker) by depositing a copy of same in the  
United States Mail with adequate postage affixed to insure delivery, addressed as follows:

Christopher L. Foreman  
WATSON SPENCE LLP  
P.O. Box 2008  
Albany, GA 31702-2008

This 11<sup>th</sup> day of January, 2017.

Respectfully submitted,

**JOEL WILLIAMS LAW, LLC**



B. Chase Elleby  
Georgia Bar No. 185666  
Attorney for Plaintiff

FILED BY FAX

IN THE SUPERIOR COURT OF DOUGHERTY COUNTY  
STATE OF GEORGIA

FILED  
2017 JAN 24 PM 12:35  
EYONNE S. MULL  
DOUGHERTY COUNTY  
CLERK OF COURTS

SANDRA SNIPES and  
KENNETH W. SNIPES

Plaintiffs,

v.

PHOEBE PUTNEY HEALTH  
SYSTEM, INC., AND PHOEBE PUTNEY  
MEMORIAL HOSPITAL, INC.,

Defendants.

CIVIL ACTION NO.  
15CV863-3

BY  
ROSA JUNQUEIRO, CLERK  
DEPUTY

FILED  
17 JAN 27 PM 2:25

COMMISSION TO TAKE DEPOSITION

The Superior Court of Dougherty County hereby authorizes the deposition, upon oral examination, of Tiffany D. Becker. The deposition is to be taken in Lodi, California 95240 pursuant to a valid subpoena issued in Dougherty County. The deposition must be conducted under the supervision of a certified court reporter authorized to administer oaths in California. The Superior Court of Dougherty County hereby requests that process issue in the above-referenced place where the examination is to be held, requiring the attendance of said deponent pursuant to a valid subpoena issued in Dougherty County.

This 23<sup>rd</sup> day of January, 2017

*Denise Marshall*  
Honorable Denise Marshall  
Judge, Superior Court of Dougherty County

cc: Joel Williams, Esq.  
Christopher Foreman, Esq.