

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

UNITED STATES OF AMERICA,

Plaintiff,

RACHEL TUDOR,

Plaintiff-Intervenor,

v.

Case No. CIV-15-324-C

SOUTHEASTERN OKLAHOMA STATE
UNIVERSITY, and

THE REGIONAL UNIVERSITY SYSTEM
OF OKLAHOMA,

Defendants.

NOTICE TO TAKE DEPOSITION

TO: All Counsel of Record

NOTICE IS HEREBY GIVEN pursuant to Rule 30(b)(1) of the Federal Rules of Civil Procedure, that Defendants Southeastern Oklahoma State University and the Regional University System of Oklahoma intend to serve a subpoena for documents, in the form attached hereto, on August 10, 2016, or soon thereafter as service may be effected for the following:

NAME	DATE	TIME	LOCATION
Dr. Jeffrey Gastorf Gastorf Family Clinic 1004 N. 19th Ave. #2 Durant, OK 74701	August 24, 2016	5:00pm	Office of Attorney General 313 NE 21 st Street Oklahoma City, OK 73105

Dated this 3rd day of August 2016.

Respectfully submitted,

/s/ Dixie L. Coffey

DIXIE L. COFFEY, OBA #11876

JEB E. JOSEPH, OBA #19137

KINDANNE JONES, OBA #11374

Assistant Attorneys General Oklahoma

Attorney General's Office

Litigation Division

313 NE 21st Street

Oklahoma City, OK 73105

Telephone: 405.521.3921

Facsimile: 405.521.4518

*Attorneys for Defendants Southeastern Oklahoma
State University and The Regional University System
of Oklahoma*

CERTIFICATE OF SERVICE

I hereby certify that on this 3rd day of August 2016, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Allan Townsend
Delora Kennebrew
Meredith Burrell
US DEPT. OF JUSTICE CIVIL RIGHTS DIVISION-DC
950 Pennsylvania Avenue NW Rm 49258 PHB
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Attorney for Intervenor Plaintiff

/s/Dixie L. Coffey
Dixie L. Coffey

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SOUTHEASTERN OKLAHOMA STATE
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Defendants.

HIPAA COMPLIANT SUBPOENA DUCES TECUM

TO: Dr. Jeffrey Gastorf
Gastorf Family Clinic
1004 N. 19th Ave. #2
Durant, OK 74701

Pursuant to Oklahoma law (12 O.S. § 2004.1) and Federal Regulations implementing Health Insurance Portability and Accountability Act (see 45 C.F.R. § 164.512), YOU ARE HEREBY COMMANDED to produce at the offices of Assistant Attorneys General, Dixie L. Coffey and Jeb E. Joseph, Office of Attorney General, 313 NE 21st Street, Oklahoma City, Oklahoma, 73105, within fourteen (14) days of receipt of this Subpoena, or on or by **August 24, 2016, the following:**

Any and all medical records and bills including, but not limited to: charts, reports, psychological evaluations and records, doctor's notes, nursing notes, admit and discharge summaries, patient histories, x-rays and other documents completed by or relating to the medical care and, treatment and therapy ever received by **Rachel Tudor a/k/a T.R. Tudor, III a/k/a Robert Tudor,(DOB: **/**/1963;SSN: ***-**-6848).**

You are advised that this subpoena complies with the Code of Federal Regulations pertaining to the disclosure of protected health information under the Health Insurance Portability and Accountability Act (HIPAA). *See*, C.F.R. §164.512. Pursuant to federal regulations, the undersigned advises you that he has faxed the Subpoena this 8th day of August 2016 (*See, Exhibit "A," Notice of Subpoena filed August 3, 2016*), and the same was sent via the ECF System to all counsel of record.

HEREOF FAIL NOT UNDER PENALTY OF LAW

In order to allow objections to the production of documents and things to be filed, you should not produce them until the date specified in this Subpoena, and if an objection is filed, you should not produce the documents and things until the Court rules on the objection.

IN WITNESS WHEREOF, I, Dixie L. Coffey, as an officer of the Court and as an attorney authorized to practice law in Oklahoma, hereby issue said Subpoena this 8th day of August, 2016.

Respectfully submitted,

/s/ Dixie L. Coffey

DIXIE L. COFFEY, OBA #11876

JEB E. JOSEPH, OBA #19137

KINDANNE JONES, OBA #11374

Assistant Attorneys General Oklahoma

Attorney General's Office

Litigation Division

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Oklahoma City, OK 73105

Telephone: 405.521.3921

Facsimile: 405.521.4518

*Attorneys for Defendants Southeastern Oklahoma
State University and The Regional University System
of Oklahoma*

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February 2016, I electronically transmitted the foregoing document to the Clerk of Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Allan Townsend
Delora Kennebrew
Meredith Burrell
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Attorneys for United States of America

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Attorney for Intervenor Plaintiff

/s/Dixie L. Coffey
Dixie L. Coffey