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February 28, 2014

Hon. Gary M. Clemens  
Clerk  
Loudoun County Circuit Court  
18 East Market Street  
Leesburg, VA 20178

Re: Citizens of Sterling v. Delgaudio  
Case No. 85754  
Request for Issuance of Subpoena  
Duces Tecum

Dear Mr. Clemens:

I am requesting your office prepare a subpoena duces tecum which I intend to forward to the Circuit Court of Montgomery, Alabama, for processing and service. I require two copies of the subpoena and both copies must be triple certified with the appropriate seal.

The name of the entity to be served is:

**The SPLC Task Force on Hate in the Public Sphere.**

The name and address of the registered agent is:

**Joseph J. Levin, Jr., 400 North Washington Ave., Montgomery, AL 36104.**

The documents and records to be produced are:

See **Attachment A** (2 copies are provided).

The documents and records are to be produced at the following location:

**Charles L. King, Esq.**  
**116 G Edwards Ferry Road**  
**Leesburg, VA 20176**  
**(703) 669-3500,**  
**(703) 669-3525 (fax)**  
**[charleskingsq@verizon.net](mailto:charleskingsq@verizon.net)**

TESTE: \_\_\_\_\_ D.C.

CLERK'S OFFICE  
LOUDOUN COUNTY, VA

2014 FEB 28 PM 1:42

FILED

Hon. Gary M. Clemens  
February 28, 2014  
Page Two

The time and date of production:

**March 28, 2014 at 5:00 p.m.**

Thank you, in advance, for your assistance. Please call when the subpoena is ready for pickup.

Very truly yours,

A handwritten signature in black ink, appearing to read "Charles L. King". The signature is written in a cursive style with a large, sweeping "C" and "K".

Charles L. King

CLK/dn  
Enclosures  
cc: Hon. James Plowman  
John P. Flannery  
Client

## EXHIBIT A

1. All written criteria, policies, guidelines, bylaws or rules of any kind used by Southern Poverty Law Center to designate organizations or groups as “hate groups” from the inception of the Southern Poverty Law Center to the present date.
2. All research, correspondence, written or electronic, witness narratives, letters, files and information, in any form and from any source, compiled and gathered on Public Advocate and/or Eugene Delgaudio prior to designating Public Advocate as a “hate group.”
3. All staff memorandums and writings of any kind summarizing or analyzing research compiled on Public Advocate and/or Eugene Delgaudio prior to designating Public Advocate as a “hate group.”
4. All minutes, recordings or video of meetings, in any form, at which Public Advocate and/or Eugene Delgaudio was discussed prior Public Advocate being named as a “hate group.”
5. All memorandums, resolutions, writings and publications, in written or electronic form, evidencing the Southern Poverty Law Center’s decision to designate Public Advocate as a “hate group.”
6. All press releases issued announcing the designation of Public Advocate as a “hate group.”
7. All research, correspondence, written or electronic, and witnesses statements compiled on Eugene Delgaudio and/or Public Advocate after the designation of “Public Advocate” as a hate group not compiled in relation to the pending copyright action in Hill, et. al., v.

Public Advocate, Civil Action No. 1:12-CV-02550, in the United States District Court for the District of Colorado.

8. All publications, articles and press releases mentioning either Public Advocate or Eugene Delgaudio.