

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

RUSSELL ZINTER; ET AL.

Plaintiffs,

v.

CHIEF JOSEPH SALVAGGIO; ET AL.

Defendants.

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CIVIL NO. SA-18-CA-680-FB

DEFENDANT CITY OF LEON VALLEY’S OBJECTIONS TO PLAINTIFFS’
SUBPOENAS AND MOTION TO QUASH

Defendant CITY OF LEON VALLEY (“City”) files this its Objections to Plaintiffs’ Subpoenas dated September 20, 2018, attached to Individual Defendants’ Objections and Motion to Quash as *Exhibit A*, [Dkt. 50, 50-1] and incorporated herein by reference, and received by Defendant City on September 27, 2018 (See attached **Exhibit “A”** emails of acceptance of service and receipt). Along with its objections, Defendant files this Motion to Quash said subpoenas pursuant to Rule 45, Federal Rules of Civil Procedure and in support thereof would show this court the following:

I. BACKGROUND

1. Defendant CITY OF LEON VALLEY moves to quash said subpoenas under Rule 45 (b) (1) for being defective. *In Re Dennis*, 330 F. 3d 696, 704 (5th Cir. 2003); *Seals v. Shell Oil Co.* 2013 W.W. 3070844 (E.D. La. June 17, 2013).
2. Defendant CITY OF LEON VALLEY objects and moves to quash Plaintiffs’ Subpoenas [Dkt. 50-1] pursuant to Rule 45 (d)(2)(b) of the Federal Rules of Civil Procedure and 45(d)(3) as

being overbroad and not proportional to the needs of the case. *American Federation of Musicians of the United States and Canada v. Scodham*, 313 F.R.E. 39, 44 (N.D. Tex. 2015).

WHEREFORE, PREMISES CONSIDERED, Defendant CITY OF LEON VALLEY, prays that its Objections and Motion to Quash be in all things granted and for such other and further relief, at law or in equity, general or special, to which Defendant City may be justly entitled.

Respectfully submitted

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ATTORNEYS FOR DEFENDANT
CITY OF LEON VALLEY

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the foregoing instrument has been served upon the below named individual(s) via E-Notification as indicated, and according to the Federal Rules of Civil Procedure on the 3rd day of October, 2018.

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E-NOTIFICATION



~~PATRICK C. BERNAL~~
ADOLFO RUIZ

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