



COMMONWEALTH OF PENNSYLVANIA
COUNTY OF BUCKS

Lori Ann Matheson,
fka Lori Ann Schmitt,
Plaintiff,

vs.

Michael Schmitt,
Defendant

File No. _____
Oakland County Circuit Court
1200 N. Telegraph Rd., Pontiac, Michigan 48341
Case No. 2015-831539-DM

**SUBPOENA TO PRODUCE DOCUMENTS OR THINGS
FOR DISCOVERY PURSUANT TO RULE 4009.22**

TO: Dr. Stanley Plotkin, 4650 Wismer Road, Doylestown, PA 18902
(Name of Person or Entity)

Within twenty (20) days after service of this subpoena, you are ordered by the court to produce the following documents or things: see attached.

Your attendance is not required if the requested documents are received within twenty days after service of this subpoena.
at Michael W. Reeds, P.C. 1038 E. West Maple Rd., Walled Lake, MI 48390
(Address)

You may deliver or mail legible copies of the documents or produce things requested by this subpoena, together with the certificate of compliance, to the party making this request at the address listed above. You have the right to seek in advance the reasonable cost of preparing the copies or producing the things sought.

If you fail to produce the documents or things required by this subpoena within twenty (20) days after its service, the party serving this subpoena may seek a court order compelling you to comply with it.

THIS SUBPOENA WAS ISSUED AT THE REQUEST OF THE FOLLOWING PERSON:

NAME: Amy M. Ruby, Esq.

ADDRESS: 1038 E. West Maple Rd.
Walled Lake, MI 48390

TELEPHONE: (248) 624-4044

SUPREME COURT ID # P71718

ATTORNEY FOR: Plaintiff Lori Matheson

BY THE COURT:

Judith J. Reiss
Prothonotary

Deputy

Date: Feb 19, 2018
Seal of the Court

Completed Subpoena must be signed and sealed by the Prothonotary before service

(Rev 12/17)

Approved, SCAO

STATE OF MICHIGAN JUDICIAL DISTRICT 6th JUDICIAL CIRCUIT COUNTY PROBATE	SUBPOENA Order to Appear and/or Produce	CASE NO. 2015-831539-DM
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Police Report No. (if applicable) 1200 N. Telegraph Rd., Pontiac, MI 48341 Court address Court telephone no. (248) 858-0582

Plaintiff(s)/Petitioner(s) <input type="checkbox"/> People of the State of Michigan <input checked="" type="checkbox"/> <u>Lori Ann Matheson</u> <u>f/k/a Lori Ann Schmitt</u>	v	Defendant(s)/Respondent(s) <u>Michael Schmitt</u> Charge
<input checked="" type="checkbox"/> Civil <input type="checkbox"/> Criminal		
<input type="checkbox"/> Probate In the matter of _____		

In the Name of the People of the State of Michigan. TO:
 Dr. Stanley Plotkin, 4650 Wismer Road, Doylestown, PA 18902

If you require special accommodations to use the court because of disabilities, please contact the court immediately to make arrangements.

YOU ARE ORDERED:

<input checked="" type="checkbox"/> 1. to appear personally at the time and place stated below: You may be required to appear from time to time and day to day until excused.		
<input type="checkbox"/> The court address above <input checked="" type="checkbox"/> Other: <u>Michael W. Reeds, P.C. 1038 E. West Maple Rd., Walled Lake, MI 48390</u>		
Day Friday	Date January 19, 2018	Time 8:30 a.m.

2. Testify at trial / examination / hearing.

3. Produce/permit inspection or copying of the following items: See attached. Also see #7 below.

4. Testify as to your assets, and bring with you the items listed in line 3 above.

5. Testify at deposition.

6. MCL 600.6104(2), 600.6116, or 600.6119 prohibition against transferring or disposing of property is attached.

7. Other: Your attendance is not required if the requested documents are received on or before January 19, 2018.

<input checked="" type="checkbox"/> 8. Person requesting subpoena <u>Amy M. Ruby, Esq.</u>	Telephone no. <u>(248) 624-4044</u>	
Address <u>1038 E. West Maple Rd.</u>		
City <u>Walled Lake</u>	State <u>MI</u>	Zip <u>48390</u>



NOTE: If requesting a debtor's examination under MCL 600.6110, or an injunction under item 6, this subpoena must be issued by a judge. For a debtor examination, the affidavit of debtor examination on the other side of this form must also be completed. Debtor's assets can also be discovered through MCR 2.305 without the need for an affidavit of debtor examination or issuance of this subpoena by a judge.

FAILURE TO OBEY THE COMMANDS OF THE SUBPOENA OR APPEAR AT THE STATED TIME AND PLACE MAY SUBJECT YOU TO PENALTY FOR CONTEMPT OF COURT.

01/12/2018
Date

Amy Ruby
 Judge/Clerk/Attorney *Amy Ruby*

P71718
Bar no.

Court use only	
<input type="checkbox"/> Served	<input type="checkbox"/> Not served

ATTACHMENT TO SUBPOENA

INSTRUCTIONS

1. In responding to these Requests for Production of Documents pursuant to MCR 2.310, you are to obtain and furnish for inspection and copying all documents in your possession, custody or control, or which are otherwise available to you, including, but not limited to, documents in the possession of your representatives, employees, agents, servants and/or attorneys.

2. If you withhold any document or information on the allegation that such document is unable to be reproduced, you are to: (a) identify the nature of the document; (b) identify the subject matter of the document; (c) identify the author and all addressees or recipients of the document; (d) identify the date of the document; and (e) set forth the explanation for the allegation that the document is unable to be produced or reproduced on paper.

3. If you withhold any document on the allegation that a document is privileged or confidential, you are to: (a) identify the nature of the document; (b) identify the subject matter of the document; (c) identify the date of the document; (d) identify the author and all addressees or recipients of the document; and (e) state the specific factual and legal basis for the allegation that the document is privileged or confidential.

4. If any document was, but no longer is, in your possession, custody or subject to your control, or in existence, state the date and nature of the document. If any document has been destroyed, for each such document, state when it was destroyed, identify the person who destroyed it and the person who directed that it be destroyed. Also, detail the reasons for the destruction; describe the nature of the document; identify the persons who created, sent and received the document; state the date of the document; and state in as much detail as possible the contents of the document.

DEFINITIONS

As used in these Requests for Production of Documents, the following terms are defined and used consistently, as follows:

1. “**and**” and “**or**” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of the discovery request all responses that might otherwise be construed to be outside of the scope.

2. “**all**,” “**any**,” and “**each**” shall each be construed as encompassing any and all.

3. “**Communications**” means every manner of transmitting and receiving facts, information, opinion and thoughts, whether orally, by document, writing or copy thereof, in conferences or conversations, or otherwise, including but not limited to, oral statements, telephone

conversations, electronic transmission, fax, e-mail, data transfer, voicemail, text messages, negotiations, conferences and meetings.

4. "**Concerning**" means relating to, relate to, consisting of, referring to, reflecting, describing, regarding, concerning, evidencing, constituting, received from, addressed to, sent to, alluding to, responding to, recording, announcing, explaining, evaluating, discussing, showing, describing, studying, reflecting, analyzing, consulting or having any logical or factual connection with the matter discussed.

5. The word "**Documentation**", "**document**" or "**documents**" is used in the broadest means possible under Michigan law and means any record of any kind, whether written, graphic, pictorial, photographic, phonographic, mechanical, taped, electronic, or otherwise, and every non-identical copy, now or formerly in your possession, custody or control. It includes, but is not limited to: papers; publications; draft; telex messages; memoranda (whether formal, informal, to the file, or otherwise); notes; notations; interviews; notes of interviews; synopses of interviews; data; work papers; diaries; agenda; bulletins; notices; announcements; minutes; folios; inter-office communications; intra-departmental communications (whether formal, informal, or otherwise, correspondence; books; transcripts; affidavits; statements; summaries; opinions; court pleadings; stenographic notes; indices; analyses; questionnaires; answers to questionnaires; telephone logs; lists; minutes of meetings and other minutes; test reports; performance reports and other reports; records; recordings of telephone conversations, interviews, conferences, meetings or other conversations; forms; studies; plans; specifications; evaluations; contracts; agreements; licenses; invoices; checks; drafts; vouchers; ledgers; journals; books or records of account; bills; receipts; desk calendars; appointment books; calculations; charts; graphs; maps; surveys; drawings; schematics; data sheets; photographs; microfilms, price lists; tabulations; bids; bid materials; quotations; supplements; amendments; addenda; blueprints; statements of account; orders; purchase orders; brochures; pamphlets; manuals; warranties; literature; inspection reports; operation reports; maintenances reports; notebooks; communiques; request for change orders; change orders; requests for information; requests for drawing approval; drawing approvals; punch lists; schedules; job calendars; case flow studies; computer studies; computer tapes and discs; magnetic tapes; punch cards; computer programs; computer processing input and output; computer programs; computer program coding sheets; any retrievable data, whether in computer storage, carded, taped, coded or stored electrostatically, electromagnetically or otherwise, and all transcripts thereof; programming instructions and other material necessary to understand the above-mentioned computer-related items; all other records kept by electronic, photographic or mechanical means; all other writings; and all things similar to any of the foregoing, regardless of their author or origin, however dominated.

6. "**Package Insert**" refers to the Package Insert of a vaccine and a copy of the Package Insert for each vaccine is available at:
<https://www.fda.gov/BiologicsBloodVaccines/Vaccines/ApprovedProducts/ucm093833.htm>

7. "**CDC's Childhood Vaccine Schedule**" means the Recommended Immunization Schedule for Children and Adolescents Aged 18 Years or Younger available at:
<https://www.cdc.gov/vaccines/schedules/downloads/child/0-18yrs-child-combined-schedule.pdf>

8. “**Vaccine Ingredient**” means the list of vaccine ingredients published in Vaccine Excipient & Media Summary available at:
<https://www.cdc.gov/vaccines/pubs/pinkbook/downloads/appendices/b/excipient-table-2.pdf>

9. “**you or your**” refers to Stanley A. Plotkin deposed in the Lawsuit on January 11, 2018.

10. “**Lawsuit**” means the action titled *Lori Matheson f/k/a Lori Ann Schmitt v. Michael Schmitt*, Case No. 2015-831539-DM pending before the Circuit Court for the County of Oakland, State of Michigan.

11. “**Defendant**” means the defendant Michael Schmitt in the lawsuit.

REQUEST FOR PRODUCTION OF DOCUMENTS

1. All Communications Concerning this Lawsuit, including but not limited to Communications with Karen Ernst. This request excludes Communications that were solely with Defendant’s counsel.

2. Documentation reflecting the duration of the safety review period and placebo control used for each clinical trial reflected in the Package Insert for each vaccine on the CDC’s Childhood Vaccine Schedule to the extent not already reflected in the Package Insert.

3. Documentation of clinical trial(s) reflecting the safety profile of the cumulative exposure of the vaccines recommended during the first two (2) years of life in the CDC’s Childhood Vaccine Schedule, including the safety profile for children with a family history of autoimmunity.

4. Documentation countering the peer-reviewed literature reflecting that aluminum adjuvants used in vaccines are taken up by macrophages, transported to brain tissue, and cause immune activation and the release of IL-6 in the brain.

5. Documentation reflecting the safety profile for each Vaccine Ingredient for each vaccine on the CDC’s Childhood Vaccine Schedule, including but not limited to monkey kidney cells, calf serum, guinea pig cell cultures, pig gelatin, lactose, yeast, egg protein, human diploid cells, human diploid lung fibroblasts, human albumin, human DNA, human proteins, PCV-1, and PCV-2.

6. All letters cited in your article “Postscript relating to new allegations made by Edward Hooper at The Royal Society Discussion Meeting on 11 September 2000” and all papers and documents in your personal files and elsewhere upon which you based your article entitled “Untruths and Consequences: the false hypothesis linking CHAT type 1 polio vaccination to the origin of human immunodeficiency virus” which are not publicly accessible at the library of the College of Physicians of Philadelphia.

7. Documentation reflecting the total amount of payments or any other remuneration you have received from any company or other entity developing and/or selling any vaccine. This request includes any such payments and remuneration you have received directly or indirectly through any company or other entity in which you have a direct or indirect ownership interest.

8. Documentation reflecting the total amount of payments or any other remuneration you have received related to the sale of any vaccine, including sales of Rotateq and any rubella vaccine (including in any combination product such as MMR, MMRV, MMR II). This request includes any such payments and remuneration you have received directly or indirectly through any company or other entity in which you have a direct or indirect ownership interest.