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THE LAW FIRM OF PUCKETT AND FARAJ, PC

March 8, 2011

Alexandria Courthouse
Clerk of Court
520 King Street, Suite 301
Alexandria, VA 22314

To the Clerk of Court:

A lawsuit is pending in the Circuit Court of Cook County, Illinois, captioned *Cynowa v. CSSS.NET, Inc. et al.*, No. 08-L-403.

Defendants have issued a subpoena from the Circuit Court of Cook County, Illinois, requesting to take the evidence deposition of Larry Carver. (Attached hereto.) The subpoena to Larry Carver requires that Carver: (a) produce documents responsive to the attached Rider for inspection and/or copying on or before March 21, 2011, at 10:00 a.m. EST, at 1800 Diagonal Road, Suite 210, Alexandria, Virginia 22314; and (b) appear for evidence deposition on March 29, 2011, beginning at 1:00 p.m. EST, at 1800 Diagonal Road, Suite 210, Alexandria, Virginia 22314.

Defendants request that the Clerk of Court issue a Virginia subpoena in conformance with the Illinois subpoena.

Upon petition, the State of Illinois issues subpoenas that incorporate the terms of out-of-state subpoenas. Illinois Supreme Court Rule 204(b) highlights the procedures for obtaining a subpoena to compel the appearance of an Illinois deponent for deposition for an action pending in another State. As such, Illinois law grants reciprocal privileges to citizens of the Commonwealth of Virginia for taking of discovery in the State of Illinois.

Therefore, in compliance with VA Code. § 8.01-412.10, Defendants respectfully request that the Clerk of Court promptly issue a Virginia subpoena for the evidence deposition for Larry Carver for service upon him.

Very truly yours,

Neal A. Puckett
(Member – Virginia Bar 44699)

Haytham Faraj
(Member – Illinois Bar 6286135)



Haytham Faraj, Esq.