

**IMMIGRATION ENFORCEMENT REVIEW BOARD
STATE OF GEORGIA**

IN RE:

COMPLAINT FILED BY D.A. KING
AGAINST THE
DEKALB COUNTY
SCHOOL DISTRICT

COMPLAINT
NO. 2017- 03

**MOTION OF THE DEKALB COUNTY SCHOOL DISTRICT
FOR ISSUANCE OF SUBPOENAS TO COMPEL
THE PRODUCTION OF DOCUMENTS**

COMES NOW, the DeKalb County School District, Respondent in the above matter, by and through its undersigned counsel, pursuant to the Immigration Enforcement Review Board rule 291-2-.03(3), respectfully moves this Board to issue the following subpoenas to compel the production of documents as follows:

1. Subpoena to **D.A. King** for any and all emails, facsimiles, letters, reports, correspondence, documents, records, minutes, agreements, transcriptions, memoranda, papers, stenographic or handwritten notes, writings, magnetic tapes, discs and other media, audio tape records, computer cards, tapes, printouts or other computer or machine readable records, notice recordings, photographic pictures, slides, negatives, microfilm, or microfiche, statistical computations, compilations, projections, studies, publications, books, notes, observations, analyses, studies, charts, drafts, lists, accumulation of data, diaries, calendars, time-keeping records, telegraphs

or other forms of written communications, any and all telephone records, including memoranda of calls received or other memorialization or tangible evidence of the occurrence or substance of any communications between D.A. King and any member, agent, employee, officer, affiliate, representative, or attorneys for the Immigration Enforcement Review Board.

2. Subpoena to **Dustin Inman Society** for any and all emails, facsimiles, letters, reports, correspondence, documents, records, minutes, agreements, transcriptions, memoranda, papers, stenographic or handwritten notes, writings, magnetic tapes, discs and other media, audio tape records, computer cards, tapes, printouts or other computer or machine readable records, notice recordings, photographic pictures, slides, negatives, microfilm, or microfiche, statistical computations, compilations, projections, studies, publications, books, notes, observations, analyses, studies, charts, drafts, lists, accumulation of data, diaries, calendars, time-keeping records, telegraphs or other forms of written communications, any and all telephone records, including memoranda of calls received or other memorialization or tangible evidence of the occurrence or substance of any communications any affiliate, member, agent, employee, officer, representative, or attorneys for the Dustin Inman Society and any member,

affiliate, agent, employee, officer, representative, or attorneys for the Immigration Enforcement Review Board.

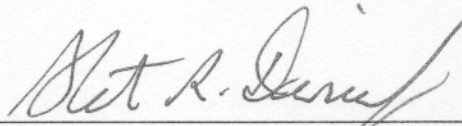
3. Subpoena to **D.A. King** for any and all emails, facsimiles, letters, reports, correspondence, documents, records, minutes, agreements, transcriptions, memoranda, papers, stenographic or handwritten notes, writings, magnetic tapes, discs and other media, audio tape records, computer cards, tapes, printouts or other computer or machine readable records, notice recordings, photographic pictures, slides, negatives, microfilm, or microfiche, statistical computations, compilations, projections, studies, publications, books, notes, observations, analyses, studies, charts, drafts, lists, accumulation of data, diaries, calendars, time-keeping records, telegraphs or other forms of written communications, any and all telephone records, including memoranda of calls received or other memorialization or tangible evidence of the occurrence or substance of any communications between D.A. King and any member, agent, employee, officer, affiliate, representative, or attorneys for Numbers USA.
4. Subpoena to **Numbers USA** for any and all emails, facsimiles, letters, reports, correspondence, documents, records, minutes, agreements, transcriptions, memoranda, papers, stenographic or handwritten notes, writings, magnetic tapes, discs and other media, audio tape records,

computer cards, tapes, printouts or other computer or machine readable records, notice recordings, photographic pictures, slides, negatives, microfilm, or microfiche, statistical computations, compilations, projections, studies, publications, books, notes, observations, analyses, studies, charts, drafts, lists, accumulation of data, diaries, calendars, time-keeping records, telegraphs or other forms of written communications, any and all telephone records, including memoranda of calls received or other memorialization or tangible evidence of the occurrence or substance of any communications between D.A. King and any member, agent, employee, affiliate, officer, representative, or attorneys for Numbers USA.

5. Subpoena to **D.A. King** for any and all emails, facsimiles, letters, reports, correspondence, documents, records, minutes, agreements, transcriptions, memoranda, papers, stenographic or handwritten notes, writings, magnetic tapes, discs and other media, audio tape records, computer cards, tapes, printouts or other computer or machine readable records, notice recordings, photographic pictures, slides, negatives, microfilm, or microfiche, statistical computations, compilations, projections, studies, publications, books, notes, observations, analyses, studies, charts, drafts, lists, accumulation of data, diaries, calendars, time-keeping records, telegraphs or other forms of written communications, any and all telephone records,

including memoranda of calls received or other memorialization or tangible evidence of the occurrence or substance of any communications between D.A. King and any member, agent, employee, officer, affiliate, representative, or attorneys for State Representative Matt Ramsey.

Respectfully submitted this 9th day of March, 2017.



Glinton R. Darien, Jr.
Georgia Bar No. 684676
Attorney for Respondent
DeKalb County School District

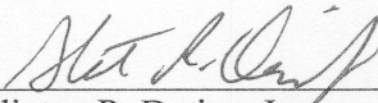
DeKalb County School District
Office of Legal Affairs
1701 Mountain Industrial Blvd.
Stone Mountain, GA 30083
Phone: 678-676-0420
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Email: glinton_darien@dekalbschoolsga.org

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, I filed the herein **MOTION OF THE DEKALB COUNTY SCHOOL DISTRICT FOR ISSUANCE OF SUBPOENAS TO COMPEL THE PRODUCTION OF DOCUMENTS** with the Immigration Enforcement Review Board. I hereby also certify that I have mailed a copy of the same by United States Postal Service, postage prepaid and properly addressed as follows:

D.A. King
2984 Lowe Trial
Marietta, Georgia 30066

This 9th day of March, 2017.



Glinton R. Darien, Jr.
Georgia Bar No. 684676
Attorney for Respondent
DeKalb County School District

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