

**IN THE CIRCUIT COURT FOR THE FIFTH JUDICIAL DISTRICT
CUMBERLAND COUNTY ILLINOIS**

PEOPLE OF THE STATE OF ILLINOIS,)

Plaintiff,)

5.)

No. 02-CF-23

PRISCILLA SCHROCK,)

Defendant.)

**GROUP RESPONSE TO MOTIONS TO QUASH SUBPOENA FILED BY JOHN
CUTRIGHT, MERVIN WOLFE, & JULIE WOLFE AND MOTION FOR PROTECTIVE
ORDER FILED BY SCOTT HUBER**

NOW COMES the Defendant, Priscilla Schrock, by and through her attorneys, J. Steven Beckett and Chad S. Beckett, of Beckett & Webber, P.C., and in support of her Group Response to Motions to Quash Subpoena Filed by Mervin Wolfe, John Cutright & Julie Wolfe and Motion for Protective Order Filed by Scott Huber, states as follows:

1. On May 24, the Defendant issued a Subpoena Duces Tecum upon Cumberland Internet, Inc., and that subpoena is subject to a Motion to Quash filed by Cumberland Internet, which remains pending before this Court. The Defendant has responded to Cumberland Internet's Motion to Quash contemporaneously to filing this Response.
2. On information and belief, on June 11, 2002 John Cutright, Mervin Wolfe, and Julie Wolfe filed Motions to Quash Defendant's Subpoena Duces Tecum directed to Cumberland Internet with the Clerk of Cumberland County. On information and belief, John Cutright and Mervin Wolfe are attorneys who practice in Cumberland County and Julie Wolfe is the spouse of Mervin Wolfe.

3. On June 11, 2002, Scott Huber filed a Motion for Protective Order with the Circuit Clerk of Cumberland County, with the stated object to prevent Cumberland Internet from complying with the subpoena duces tecum issued at the request of the Defendant on May 24, 2002.
4. The aforementioned pleadings allege that the respective parties are entitled under the First and Fourth Amendment to prevent Cumberland Internet from disseminating the information sought by the subpoena. These arguments are summary in nature, laced with frivolous conjecture, and refer only vaguely to constitutional and judicial authority as a basis for relief.
5. Defendant incorporates her arguments in response to Cumberland Internet, Inc.'s Motion to Quash subpoena herein as response to the constitutional arguments raised by the parties herein. A true and correct copy of said pleading is attached hereto as Exhibit AA and incorporated herein by reference.
6. For the reasons set forth with specificity in Exhibit AA hereto, the aforementioned Motions to Quash and Motion for Protective Order should be denied.

WHEREFORE, Defendant, Priscilla Schrock prays that this Court deny the Motions to Quash filed by John Cutright, Mervin Wolfe, and Julie Wolfe, and to deny the Motion for Protective Order filed by Scott Huber in this cause.

Respectfully Submitted,

PRISCILLA SCHROCK

By: _____
One of her attorneys

CERTIFICATE OF SERVICE

I hereby certify that on the _____ day of **June, 2002**, a copy of the foregoing ***Group Response To Motions to Quash Subpoena Filed by John Cutright, Mervin Wolfe, & Julie Wolfe and Motion For Protective Order Filed By Scott Huber*** was served by placing the same in an envelope, securely sealed, postage pre-paid and legibly addressed to the following individuals:

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Criminal Prosecutions/Financial Crime Unit
100 West Randolph Street, 12th Floor
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John Cutright
P.O. Box 97
Toledo, IL 62468

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