

**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.)

RESPONSE TO MOTION TO QUASH SUBPOENA
FILED BY CUMBERLAND INTERNET

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 Response to Motion to Quash Subpoena filed by Cumberland Internet, Inc., states as follows:

1. On May 24, 2002, the Defendant caused a Subpoena Duces Tecum to be issued upon Cumberland Internet, Inc. and that subpoena is subject to a Motion to Quash filed by Cumberland Internet.
2. The subpoena directs Cumberland Internet to produce information that would provide the identity of individuals or associate the individuals named therein with certain messages that are relevant to the Defendant's case and that were posted on Cumberland Internet's message board.
3. Defendant denies that the subpoena interferes with First Amendment rights of Cumberland Internet's customers and denies that the customers have a right to post and remain anonymous.

4. Defendant denies that compliance with the subpoena will have any effect on the speech of the current or future message board participants.
5. Defendant denies that the subpoena is vague and overly broad.
6. Defendant has filed a Memorandum in Support of her Response to Cumberland Internet's Motion to Quash the Subpoena contemporaneous to the filing of this pleading.

WHEREFORE, Defendant, Priscilla Schrock prays that this Court deny the Motion to Quash filed by Cumberland Internet.

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 *Response to Motion to Quash Subpoena Filed by Cumberland Internet* and its supporting *Memorandum in Support of Response to Motion to Quash Subpoena Filed By Cumberland Internet* were served by placing the same in an envelope, securely sealed, postage pre-paid and legibly addressed to the following individuals:

John Greenwood
Criminal Prosecutions/Financial Crime Unit
100 West Randolph Street, 12th Floor
Chicago, IL 60601

Joseph D. Murphy, Esq.
306 West Church Street
P.O. Box 6750
Champaign, IL 61826-6750

One of her attorneys

**J. STEVEN BECKETT
CHAD S. BECKETT
BECKETT & WEBBER, P.C.**
508 S. Broadway Ave.
P.O. Box 17160
Urbana, IL 61803-7160
217-328-0263
217-328-0290 FAX

