

1 Chase Jones,
2 [REDACTED] 1,
3 [REDACTED]
4 [REDACTED] 1

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Superior Court of California,
County of Los Angeles
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David W. Slayton,
Executive Officer/Clerk of Court,
By A. Gonzalez, Deputy Clerk

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7 **IN THE SUPERIOR COURT OF CALIFORNIA**
8 **COUNTY OF LOS ANGELES**

9
10 [REDACTED],
11
12 Plaintiff,
13 vs.
14 David Neal,
15
16 Defendant

) Case No.: 23STR007347
)
) **DECLARATION IN SUPPORT OF**
) **MOTION TO QUASH SUBPOENA**
)
)
)
)
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17 I, Chase Jones, declare as follows:

18
19 **1. Introduction**

20 I am the individual associated with the Google account linked to the email address
21 [REDACTED]@gmail.com, which is subject to a subpoena in the above-entitled matter. I have
22 personal knowledge of the facts set forth in this declaration and could and would competently testify
23 to them if called as a witness.

24
25 **2. Background of the Case**

26 This declaration supports the Motion to Quash the Subpoena issued in the case of [REDACTED] v.
27 David Neal, demanding extensive information from my Google account.
28

1 **3. Overbroad and Unreasonable Request**

2 The subpoena requests detailed financial and account ownership information that is excessively
3 broad and not tailored to the specific issues of this case. Such requests are unreasonable and
4 oppressive, exceeding the scope of permissible discovery.
5

6 **4. Lack of Relevance**

7 The information sought by the subpoena does not have a reasonable connection to the disputed
8 facts of the case. The demand for comprehensive account details is irrelevant to the subject matter of
9 the ongoing litigation.
10

11 **5. Privacy Concerns and Constitutional Rights**

12 Producing the requested information would infringe upon my privacy rights as protected under the
13 California Constitution (Article I, Section 1) and the Fourth Amendment of the United States
14 Constitution. The subpoena unjustifiably violates these rights.
15

16 **6. Protection Under Federal Laws**

17 The information in my Google account is protected under the Stored Communications Act (SCA),
18 18 U.S.C. § 2702. The SCA safeguards the privacy of electronic communications and prohibits
19 unauthorized disclosure, which this subpoena directly challenges.
20

21 **7. Conclusion**

22 The subpoena issued in this case is overbroad, irrelevant, and infringes upon constitutionally and
23 federally protected privacy rights. Therefore, it is imperative that this Motion to Quash the Subpoena
24 be granted to protect my rights and uphold the legal standards governing the issuance of subpoenas.
25
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1 I declare under penalty of perjury under the laws of the State of California that the foregoing is true
2 and correct.

3 Executed on December 19th, 2023.

4 Chase Jones /s/
5
6

7 **CERTIFICATE OF SERVICE**

8 I hereby certify that on December 19th, 2023, I served a copy of this DECLARATION IN SUPPORT
9 OF MOTION TO QUASH SUBPOENA Subpoena on all parties or their legal representatives in this
10 case via eFiling.
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13 Chase Jones
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