

IN THE CIRCUIT COURT OF MADISON COUNTY, MISSISSIPPI

PHIL BRYANT & DEBORAH BRYANT

PLAINTIFFS

vs.

Civil Action No. 45CI1:23-CV-238-JM

DEEP SOUTH TODAY d/b/a MISSISSIPPI TODAY, *et al.*

DEFENDANTS

DEPOSITION SUBPOENA (CIVIL ACTION)

TO: Darra L. Woolman
1009 Annandale Dr.
Madison, MS 39110

[X] *Testimony:* **YOU ARE COMMANDED** to appear at the place, date and time specified below to testify at a deposition. If you are an entity, you must designate one or more person(s) to testify on the entity's behalf.

The deposition will be taken for use as evidence in this action before a Notary Public or some other officer authorized to administer oaths and will be recorded by audio and video.

[X] *Production:* **YOU ARE COMMANDED** to also bring with you and produce at the time, date, and place set forth the following documents, electronically stored information, or things within your possession, custody or control, and to permit Inspection and copying of the materials: **SEE EXHIBIT 1 ATTACHED HERETO.**

Place: McCraney Montagnet Quin & Noble, PLLC
602 Steed Road
Ridgeland, MS 39157

Date & Time: August 10, 2026 at 9:00 a.m., or should the parties and deponent agree, at mutually agreed upon time, date and locale.

The following provisions of M.R.C.P. 45 are attached - Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e), relating to your duty to respond to the subpoena.

DATE: **July 15, 2026**

CLERK OF COURT

OR

Signature of Clerk


Attorney's Signature

The names, email addresses, and telephone number of the attorney representing the **Plaintiffs Phil Bryant and Deborah Bryant** who issued or requested this Subpoena:

William M. Quin II (MS Bar No. 10834)
MCCRANEY MONTAGNET QUIN & NOBLE, PLLC
602 Steed Road, Suite 200
Ridgeland, Mississippi 39157
Telephone: (601) 707-5725
Facsimile: (601) 510-2939
Email: wquin@mmqnlaw.com

Notice to the person who issues or requests this subpoena:

This subpoena must first be served upon each party pursuant to M.R.C.P. 5 before it is served on the person to whom it is directed. M.R.C.P. 45(a)(5).

PROOF OF SERVICE – SUBPOENA

Date of Personal Service:	Place of Service:
Served on: (Print Name)	
Served by: (Print Name)	Title:

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the State of Mississippi that the foregoing information contained in the Proof of Service is true and correct.	
Executed on: _____ Date	_____ Signature of Server
	_____ Address of Server

NOTICE TO PERSONS SUBJECTED TO SUBPOENAS

Mississippi Rules of Civil Procedure 45 (d) and (e)

(d) Protection of Persons Subject to Subpoenas.

(1) In General.

(A) On timely motion, the court from which a subpoena was issued shall quash or modify the subpoena if it (i) fails to allow reasonable time for compliance; (ii) requires disclosure of privileged or other protected matter and no exception or waiver applies, (iii) designates an improper place for examination, or (iv) subjects a person to undue burden or expense.

(B) If a subpoena (i) requires disclosure of a trade secret or other confidential research, development, or commercial information, or (ii) requires disclosure of an unretained expert's opinion or information not describing specific events or occurrences in dispute and resulting from the expert's study made not at the request of any party, the court may order appearance or production only upon specified conditions.

(2) Subpoenas for Production or Inspection.

(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents, electronically stored information, or tangible things, or to permit inspection of premises need not appear in person at the place of production or inspection unless commanded by the subpoena to appear for deposition, hearing or trial. Unless for good cause shown the court shortens the time, a subpoena for production or inspection shall allow not less than ten days for the person upon whom it is served to comply with the subpoena. Absent order of the court, production or inspection shall not be made until the tenth day after the date of service of the subpoena on the recipient and this shall be conspicuously noted on the face of the subpoena. A subpoena commanding production or inspection will be subject to the provisions of Rule 26(d).

(B) The person to whom the subpoena is directed may, within ten days after the service thereof or on or before the time specified in the subpoena for compliance, if such time is less than

ten days after service, serve upon the party serving the subpoena written objection to inspection or copying of any or all of the designated materials, or to inspection of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the material except pursuant to an order of the court from which the subpoena was issued. The party serving the subpoena may, if objection has been made, move at any time upon notice to the person served for an order to compel the production or inspection.

(C) The court, upon motion made promptly and in any event at or before the time specified in the subpoena for compliance therewith, may (i) quash or modify the subpoena if it is unreasonable or oppressive, or (ii) condition the denial of the motion upon the advance by the person in whose behalf the subpoena is issued of the reasonable cost of producing the books, papers, documents, or tangible things.

(e) Duties in Responding to Subpoena.

(1) Producing Documents or Electronically Stored Information.

(A) Documents. A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(B) Form for Producing Electronically Stored Information Not Specified.

If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) Electronically Stored Information Produced in Only One Form.

The person responding need not produce the same electronically stored information in more than one form.

(D) Inaccessible Electronically Stored Information.

The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery, motion for a protective order, or motion to quash, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(5). The court may specify conditions for the discovery, including those listed in Rule 26(b)(5).

(2) Claiming Privilege or Protection

(A) Information Withheld. When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

(B) Information Produced. If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

CERTIFICATE OF SERVICE

I, the undersigned, hereby certify that I have electronically filed the foregoing with the Clerk of the Court using the MEC system which sent notification of such filing to all counsel of record.

SO CERTIFIED, this 15th day of July, 2026.

/s/ William M. Quin II
William M. Quin II (MS Bar No. 10834)