

SUBPOENA DUCES TECUM (CIVIL) –
ATTORNEY ISSUED VA. CODE §§ 8.01-413, 16.1-89, 16.1-265;
Commonwealth of Virginia Supreme Court Rules 1:4, 4:9

Case No.: 2025-0003246
10 a.m. April 2, 2025
HEARING DATE AND TIME

Fairfax County Circuit Court
4110 Chain Bridge Road, Fairfax, VA 22030
COURT ADDRESS
Fairfax Workers Coalition, et al. v./In re: Fairfax County, et al.

TO THE PERSON AUTHORIZED BY LAW TO SERVE THIS PROCESS:

You are commanded to summon

Service Employees International Union, Virginia 512 C/O LaNoral Thomas, President
NAME
3545 Chain Bridge Road, Suite 106
STREET ADDRESS
Fairfax Virginia 22030
CITY STATE ZIP

TO the person summoned: You are commanded to make available the documents and tangible things designated and described below:

All documents submitted to Sarah Miller Espinosa, SME Dispute Resolution, LLC, or Fairfax County as a part of the Service Employees International Union, Virginia 512 petition for certification as the exclusive collective bargaining representative for General County employees of Fairfax County, VA, from December 1, 2024, through March 1, 2025.

at CCF- 3050 Chain Bridge Road, Suite 200 Fairfax, Virginia 22030 at 10 a.m. on April 2, 2025
LOCATION DATE AND TIME

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control.

This Subpoena Duces Tecum is issued by the attorney for and on behalf of

Fairfax Workers Coalition, et al.
PARTY NAME
John C. Cook, Esq. 38310
NAME OF ATTORNEY VIRGINIA STATE BAR NUMBER
3050 Chain Bridge Road, Suite 200 703-865-7480
OFFICE ADDRESS TELEPHONE NUMBER OF ATTORNEY
Fairfax, Virginia 22030 703-434-3510
OFFICE ADDRESS FACSIMILE NUMBER OF ATTORNEY
March 11, 2025
DATE ISSUED SIGNATURE OF ATTORNEY

Notice to Recipient: See page two for further information.

RETURN OF SERVICE (see page two of this form)

TO the person summoned:

If you are served with this subpoena less than 14 days prior to the date that compliance with this subpoena is required, you may object by notifying the party who issued the subpoena of your objection in writing and describing the basis of your objection in that writing.

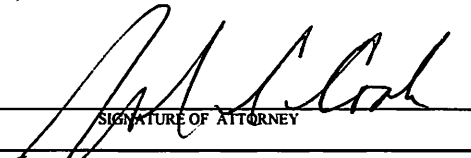
This SUBPOENA DUCES TECUM is being served by a private process server who must provide proof of service in accordance with Va. Code § 8.01-325.

TO the person authorized to serve this process: Upon execution, the return of this process shall be made to the clerk of court.

NAME:	Christopher J. Falcon		
ADDRESS:	4110 Chain Bridge Road, Fairfax, VA, 22030		
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.	703-691-7320	
Being unable to make personal service, a copy was delivered in the following manner:			
<input type="checkbox"/>	Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above:		
<input type="checkbox"/>	Posted on front door or such other door as appear to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)		
<input type="checkbox"/> NOT FOUND	_____, Sheriff		
DATE	by	Deputy Sheriff	

CERTIFICATE OF COUNSEL

I, John C. Cook, counsel for Fairfax Workers Coalition. et al., hereby certify that a copy of the foregoing subpoena duces tecum was Served via email DELIVERY METHOD to Heidi Meinzer, Amy Smith, Elizabeth Teare *Marm Greene*, counsel of record for Sarah Espinosa and Fairfax County, et al. on the 11th day of March, 2025.



 SIGNATURE OF ATTORNEY

NOTICE: Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417