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UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION

**World Wide Association of Specialty
Programs, a Utah Corporation,**

Plaintiff,

V.

PURE, Inc., PURE Foundation, Inc.
Sue Scheff, and Does I through 10,

Defendants.

OBJECTION TO SUBPOENAS AND MOTION TO QUASH

Case Number:2:02-cv-00010PGC

Judge Paul G. Cassell

COME NOW the Defendants, PURE, Inc. PURE Foundation, Inc. and Sue Scheff, by and through counsel and hereby object to the Subpoenas Duces Tecum served by the Plaintiff on Sorensen's Ranch School Inc., The Whitmore Academy Inc., Oak Ridge Military Academy, Inc., Glacier Mountain Academy, Inc., Safe Harbor Haven aka Safe Harbor Boys Home, New Horizons Youth Ministries, and Red Rock Canyon School. L.L.C. Furthermore the Defendants move to quash these Subpoenas. This motion is brought pursuant to

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Rules 26 and 45 of the Federal Rules of Civil Procedure and should be granted because the information requested is irrelevant to the claims and defenses in this case and seeks the production of confidential commercial information. Therefore discovery of the requested information is improper and is only intended to harass and annoy the Defendants and the businesses with whom they associate. This Objection and Motion is supported by a Memorandum in Support.

DATED this 6 day of June, 2003.



Aaron W. Flater
Attorney for Defendants

CERTIFICATE OF MAILING

I hereby certify that on this 6 day of June, 2003, a true and correct copy of the foregoing **OBJECTION TO SUBPOENAS AND MOTION TO QUASH**, was mailed postage prepaid, to the following:

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Sorenson's Ranch
Registered Agent: Paul Simkins
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Whitmore Academy
Registered Agent: Mark V. Sudweeks
110 South Main Street
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Oak Ridge Military Academy
Registered Agent: Sue Embry
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Oak Ridge, NC 27401

Glacier Mountain
Registered Agent: Larry Bauer
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Sandpoint, Idaho 83864

Safe Harbor Haven
aka Safe Harbor Boys Home
Registered Agent: Rowe & Rowe
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New Horizons Youth Ministries
Registered Agent: Timothy Blosson
100 South 350 East
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Red Rock Canyon School
Registered Agent: Melanie Habibian
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St. George, Utah 84770

A handwritten signature in black ink, appearing to read "Aaron Hata", is written over a horizontal line.