

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

NATHAN J. WADE,)
)
Plaintiff,)
) CIVIL ACTION
v.)
) FILE NO. 21-1-08166
JOYCELYN WADE,)
)
Defendant.)

**DEFENDANT'S RESPONSE TO EMERGENCY MOTION BY NON-PARTY DEPONENT FOR
PROTECTIVE ORDER**

COMES NOW the Defendant, JOYCELYN WADE, by and through her counsel of record, and hereby files her response to non-party, Fani T. Willis's, *Emergency Motion by Non-Party Deponent for Protective Order* and would demonstrate to this Honorable Court as follows:

INTRODUCTION

Non-party, Fani T. Willis, seeks this Court's intervention via a protective order to avoid sitting for a court-ordered deposition. The arguments asserted by Ms. Willis are disingenuous, specious, and her claimed basis for same fails as a matter of law. Upon information and belief, Ms. Willis has information and knowledge directly relevant to alleged conduct of the Plaintiff that would be considered by the Court as to equitable division of the marital estate, dissipation of marital assets, and spousal support. Furthermore, Ms. Willis's implied threat to pursue charges against Defendant and her counsel, based on inconvenient facts from her

personal life that are directly relevant to the ongoing divorce proceedings in the above-styled action, is an affront to the integrity of her office.

Contrary to the assertions in her *Motion*, Ms. Willis's prevarications regarding Defendant's conduct in her marriage seem to demonstrate that Ms. Willis does, in fact, possess intimate information about The Wade's marriage, albeit false and libelous misinformation.

BACKGROUND

Plaintiff was appointed as a special prosecutor by Ms. Willis on November 1, 2021. Plaintiff filed for divorce on November 2, 2021. Defendant was served by process server on November 3, 2021. Before Defendant even filed her Answer and Counterclaim, Plaintiff filed a motion asking the court to seal the record in this divorce action.

Plaintiff did not reveal to Defendant his appointment by Ms. Willis or the substantial income he has been receiving throughout this divorce case as a result of that appointment, and Defendant did not discover the same until much later in the proceedings. Plaintiff also left Defendant with little means of financial support while simultaneously spending tens of thousands of dollars per month on a very lavish lifestyle. Plaintiff willfully failed to comply with his discovery obligations in the very divorce case that he initiated, which led to the Court holding him contempt of this Court's Order on Defendant's Motion to Compel Discovery.

On December 22, 2023, Plaintiff only produced a portion of his outstanding required discovery responses. In these responses were credit card statements which demonstrated that Plaintiff had paid for and taken trips unrelated to his work with the Fulton County District Attorney's office. Since Plaintiff filed for divorce, he has taken trips to San Francisco and Napa Valley, to Florida and even gone on Caribbean cruises, enjoyed a trip to Belize, another to the country of Panama and even just last month took a trip to Australia. The evidence is clear that Ms. Willis was an intended travel partner for at least some of these trips as indicated by flights he purchased for her to accompany him. [True and accurate copies of credit card statements showing purchase of plane tickets for Plaintiff and Ms. Willis are attached hereto as composite Exhibit A.]

ARGUMENT

Defendant seeks to depose Ms. Willis in order to determine details surrounding her romantic affair with Plaintiff, as there appears to be no reasonable explanation for their travels apart from a romantic relationship. Ms. Willis contends in error that given the parties both citing in their divorce pleadings the no-fault provision of "irretrievably broken with no reasonable hope of reconciliation" that Defendant's inquiry into Plaintiff's infidelity is impermissible. However, Ms. Willis is mistaken. In Georgia divorce proceedings, a party can amend a pleading up to the entry of the pre-trial order, and as no pre-trial order has been entered in this case such amendments are permissible. Price v.

Price, 243 Ga. 4, 5 (252 S.E.2d 402) (1979); Nelson v. Zant, 261 Ga. 358, 405 S.E.2d 250 (1991); Jackson v. Paces Ferry Dodge, 183 Ga. App. 502, 503 (359 S.E.2d 412) (1987), and Ga. Code Ann. § 9-11-15 (a).

Furthermore, a party to a divorce action is not required to allege adultery in the complaint or counterclaim in order to discover and present evidence of same.

Although the Defendant was unaware of a romantic relationship between Ms. Willis and her husband when filing her counterclaim, the Court of Appeals of Georgia in Ewing v. Ewing stated:

“in divorce cases, such as this case, in which the equitable division of property is at issue, the conduct of the parties, including evidence of a spouse's alleged adultery, is relevant and admissible. See Wood v. Wood, 283 Ga. 8, 11 (5) (655 SE2d 611) (2008). Accordingly, the wife is entitled to engage in discovery which might lead to admissible evidence of the husband's alleged adultery. See OCGA § 9-11-26 (b) (1).” Ewing v. Ewing, 333 Ga. App. 766 (2015).

Parties may obtain discovery regarding any matter, not privileged, which is relevant to the subject matter involved in the pending action[.] OCGA § 9-11-26 (b) (1). “[I]n the discovery context, courts should and ordinarily do interpret ‘relevant’ very broadly to mean matter that is relevant to anything that is or may

become an issue in the litigation.” [emphasis supplied] Bowden v. The Medical Center, 297 Ga. 285, 291 (2) (a) (773 SE2d 692) (2015).

Contrary to Ms. Willis's belief, the Defendant is not utilizing the deposition to harass her but rather to seek pertinent information from her husband's paramour regarding her relationship with Plaintiff and the extent of the Plaintiff's financial involvement in the same. These answers are relevant to the equitable division of the marital estate, dissipation of marital assets, and the Plaintiff's capacity to provide spousal support.

Ms. Willis also mistakenly relies on Section 26.1 of Chapter 11 of the Georgia Civil Practice Act to shield herself from deposition. O.C.G.A. § 9-11-26.1 stating that “[p]rotective orders for certain high-ranking members of a governmental body or public or private entity...[can be issued for] good cause... to prohibit the deposition of an officer [who] lacks unique personal knowledge of any matter that is relevant to the subject matter involved in the pending action.” Upon information and belief, Ms. Willis certainly would have unique personal knowledge of a romantic relationship she was having with Plaintiff and trips she took with him, either before or after the divorce was filed; therefore, her argument lacks merit.¹

¹ See General Motors, LLC v. Buchanan, 313 Ga 811 (2022) which held that to the extent the factors are asserted by a party seeking a protective order, a trial court should consider whether the executive's high rank, the executive's lack of unique personal knowledge of relevant facts, and the availability of information from other sources demonstrate good cause for a protective order under O.C.G.A. § 9-11-26. The Court also stated that this “apex” doctrine can also apply to high-level government officials, who are not subject to depositions unless they have some personal knowledge about the matter and the party seeking the deposition makes a showing that the information cannot be obtained elsewhere.

As for Ms. Willis's argument that the subpoena service was defective, the subpoena, which came from and was sealed by the clerk of court of Cobb County, was properly served in accordance with Georgia law, and a notice of deposition was contemporaneously filed into the Court's record and served upon Plaintiff's counsel, which denoted the method by which the subpoena would be recorded. It would be impossible to obtain Ms. Willis's home address due to her position which allows for her address to be shielded from public view, so normal investigative techniques for locating home addresses would be fruitless, such as a skip trace. The process server effectuated notorious service with Tia Green, Executive Assistant to District Attorney Fani T. Willis at the Fulton County District Attorney's offices on January 8, 2024. It should be noted that after a previous attempt to serve Ms. Willis at the Fulton County District Attorney's office the week prior, notorious service was accomplished with Ms. Willis' Executive Assistant upon Ms. Green's representation that she was authorized to accept service on Ms. Willis's behalf. [A true and accurate copy of the Affidavit of Process Server is attached hereto as Defendant's Exhibit B]. However, in an abundance of caution, Defendant has served a new subpoena for deposition upon Ms. Willis by statutory overnight service congruent with O.C.G.A. § 24-13-24, the same to be delivered to the Fulton County District Attorney's Office on January 19, 2024, four

(4) days before her deposition. [A true and accurate copy of the second subpoena to Fani Willis dated January 18, 2024 attached hereto as Exhibit C.]

In her Motion, Ms. Willis has presented extensive, personal information regarding the Wade's marriage, including false allegations of the Defendant engaging in an affair in 2017. However, the evidence will demonstrate that Ms. Wade did not have an affair. Defendant was experiencing a profound sense of disconnection in her marriage to the Plaintiff, who had essentially ceased investing in their relationship following Plaintiff's own, actual infidelity. Feeling lonely and isolated following Plaintiff's prior infidelity, Defendant regrettably reconnected with an old friend through social media and text messages were the sole extent of their contact. Plaintiff and Defendant successfully worked through this issue, as evidenced by the fact that it was not until four (4) years later that Plaintiff filed for divorce. It is crucial to emphasize that the Defendant never met in person with the individual she texted with during that period, had no physical contact with him and certainly did not engage in any travel with him. Defendant's counsel intends to, among other things, examine Ms. Willis regarding these allegations she has made against Defendant, the facts and circumstances surrounding her obtaining this "information", as well as regarding her own personal relationship with Defendant.

Allegations regarding the parties' marriage contained in Ms. Willis Motion essentially raises the question of whether Ms. Willis possesses equal intimate

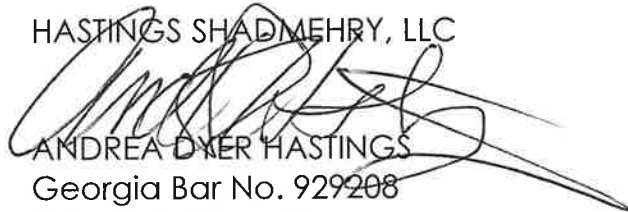
knowledge of any marital discord involving any other of her special prosecutors. Her public inquiry of “why the one” seems to be met with a response that suggests, “because you, Ms. Willis, are having an affair with him and not them.”

It is regrettable that Ms. Willis has filed such an inflammatory *Motion*, which has left Defendant with no other choice than to respond forcefully and with supporting evidence in a case that is very personal in nature. The Defendant's sole objective is to lead a peaceful life, and her counsel is committed to ensuring she has adequate means to support herself and defend herself in this litigation. If non-party, Ms. Willis, seeks protection, it appears that the one she needs protection from is herself.

WHEREFORE, Defendant prays this Honorable Court deny the *Emergency Motion by Non-Party Deponent for Protective Order*. And all other relief the Court deems fair and proper.

Respectfully submitted this 19th day of January, 2024.

HASTINGS SHADMEHRY, LLC



ANDREA DYER HASTINGS

Georgia Bar No. 929208

MALI SHADMEHRY

Georgia Bar No. 670858

STEPHANIE WEIL

Georgia Bar No. 447893

Attorneys for Respondent

3650 Mansell Road, Suite 475
Alpharetta, Georgia 30022
(770) 641-8200
andee@hsfamilylaw.com
mali@hsfamilylaw.com
stephanie@hsfamilylaw.com

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**


NATHAN WADE,)	
)	
Plaintiff,)	CIVIL ACTION
)	
v.)	FILE NO. 21-1-08166
)	
JOYCELYN WADE,)	
)	
Defendant.)	

CERTIFICATE OF SERVICE

I certify that I have this day, served a copy of the foregoing *Defendant's Response to Emergency Motion by Non-Party Deponent for Protective Order*, upon Plaintiff and Non-Party Deponent, by and through their counsels of record, via statutory electronic service addressed as follows:

M. Scott Kimbrough skimbrough@dupree-lawfirm.com Attorney for Plaintiff	Cinque Axam Cinque.axam@axamlaw.com Attorney for Non-Party Deponent
-------------------------------------------------------------------------------	---------------------------------------------------------------------------

This 19th day of January, 2024.

HASTINGS SHADMEHRY LLC

ANDREA DYER HASTINGS
Georgia Bar No. 929208
MALI C. SHADMEHRY
Georgia Bar No. 670858
STEPHANIE D. WEIL
Georgia Bar No. 447893
Attorneys for Defendant

3650 Mansell Road, Suite 475
Alpharetta, Georgia 30022
andee@hsfamilylaw.com
mali@hsfamilylaw.com
stephanie@hsfamilylaw.com

Transactions

Visit capitalone.com to see detailed transactions.

NATHAN J WADE #2144: Payments, Credits and Adjustments

Trans Date	Post Date	Description	Amount
Apr 20	Apr 20	CAPITAL ONE ONLINE PYMTAuthDate 18-Apr	-\$20,000.00

NATHAN J WADE #2144: Transactions

Trans Date	Post Date	Description	Amount
Apr 17	Apr 18	STATE BAR OF GEORGIA404-527-8700GA	\$289.00
Apr 23	Apr 24	FRAMEBRIDGE202-629-0727DC	\$272.25
Apr 25	Apr 27	DELTA AIR 0062103347436ATLANTAGA TK#: 0062103347436PSGR: WADE/NATHAN J ORIG: ATL, DEST: SFO, S/O: O, CARRIER: DL, SVC: W ORIG: SFO, DEST: ATL, CARRIER: DL, SVC: W	\$817.80
Apr 25	Apr 27	DELTA AIR 0062103347437ATLANTAGA TK#: 0062103347437PSGR: WILLIS/FANI TAI ORIG: ATL, DEST: SFO, S/O: O, CARRIER: DL, SVC: W ORIG: SFO, DEST: ATL, CARRIER: DL, SVC: W	\$817.80
May 1	May 2	WWP*BUG BUSTERS USA770-517-0200GA	\$87.00
May 2	May 3	ETT*AlightBatonRougeRENT801-8775491IL	\$643.90
May 4	May 4	COMCAST CABLE COMM800-COMCASTGA	\$397.55
May 4	May 4	1-800-FLOWERS.COM,INC.800-468-1141NY	\$73.58
May 4	May 4	1-800-FLOWERS.COM,INC.800-468-1141NY	\$73.58
May 5	May 6	A *Mack for Judge225-2501301GA	\$250.00
May 12	May 13	UBER TRIPHELP.UBER.COMCA	\$148.46
May 13	May 15	UBER TRIPHELP.UBER.COMCA	\$22.15
May 14	May 15	UBER TRIPHELP.UBER.COMCA	\$27.58
May 14	May 15	UBER TRIPHELP.UBER.COMCA	\$155.34
May 14	May 16	DOUBLETREE NAPA VALLEY707-6742100CA	\$228.04
May 14	May 16	DOUBLETREE NAPA VALLEYAMERICAN CANYCA	\$612.18
May 17	May 18	BURSAR OPERATIONS225-5787809LA	\$7,128.88
NATHAN J WADE #2144: Total Transactions			\$12,045.09

Total Transactions for This Period

\$12,045.09

Fees

Trans Date	Post Date	Description	Amount
Total Fees for This Period			\$0.00

Additional Information on the next page



Transactions			
Visit capitalone.com to see detailed transactions.			
NATHAN J WADE #2144: Payments, Credits and Adjustments			
Trans Date	Post Date	Description	Amount
Dec 29	Dec 29	CAPITAL ONE ONLINE PYMTAuthDate 29-Dec	-\$1,550.00
Jan 5	Jan 6	DELTA AIR 0062351980386FIUMICINO \$119.30 EUR 0.951203955 Exchange Rate TK#: 0062351980386 PSGR: WADE/NATHAN JER ORIG: ROM, DEST: ROM, S/O: O, CARRIER: DL	-\$125.42
NATHAN J WADE #2144: Transactions			
Trans Date	Post Date	Description	Amount
Dec 17	Dec 19	UBER TRIPHELP.UBER.COMCA	\$23.67
Dec 22	Dec 23	TARGET 00011064MARIETTAGA	\$87.41
Dec 28	Dec 28	UBER EATSHHELP.UBER.COMCA	\$23.38
Jan 1	Jan 2	ETT*AlightBatonRougeRENT801-8775491IL	\$620.28
Jan 2	Jan 3	RUM RUNNERSFREEPORT \$198.75 BSD 1.000000000 Exchange Rate	\$198.75
Jan 2	Jan 3	ISLAND JEEP & CAR RENTALFREEPORT \$98.00 BSD 1.000000000 Exchange Rate	\$98.00
Jan 3	Jan 4	NORWEGIAN SKY8662347350FL	\$214.80
Jan 4	Jan 4	COMCAST CABLE COMM800-COMCASTGA	\$372.63
Jan 4	Jan 4	UBER TRIPHELP.UBER.COMCA	\$12.94
Jan 5	Jan 6	MACYS TOWN CENTERKENNESAWGA	\$392.15
Jan 8	Jan 9	KROGER #657MARIETTAGA	\$107.04
NATHAN J WADE #2144: Total Transactions			\$2,151.05
Total Transactions for This Period			\$2,151.05
Fees			
Trans Date	Post Date	Description	Amount
Total Fees for This Period			\$0.00

Transactions			
Visit capitalone.com to see detailed transactions.			
NATHAN J WADE #2144: Payments, Credits and Adjustments			
Trans Date	Post Date	Description	Amount
Oct 22	Oct 22	CAPITAL ONE ONLINE PYMTAuthDate 22-Oct	- \$3,500.00
Oct 25	Oct 25	CREDIT-CASH BACK REWARD	- \$175.17
Nov 15	Nov 15	CAPITAL ONE ONLINE PYMTAuthDate 15-Nov	- \$2,500.00
NATHAN J WADE #2144: Transactions			
Trans Date	Post Date	Description	Amount
Oct 21	Oct 22	JD 1141ATLANTAGA	\$424.71
Oct 28	Oct 29	UBER TRIPHELP.UBER.COMCA	\$5.18
Oct 28	Oct 29	UBER TRIPHELP.UBER.COMCA	\$23.30
Oct 31	Nov 1	FREEDOM OF THE SEASMIAMIFL	\$992.28
Nov 2	Nov 3	ETT*AlightBatonRougeRENT801-87754911L	\$640.02
Nov 4	Nov 7	HYATT REGENCY ARUBA RESORARUBA	\$370.88
Nov 6	Nov 7	Norwegian Cruise Line866-2347350FL	\$3,172.20
Nov 7	Nov 8	AT&T C382 46374MARIETTAGA	\$102.34
NATHAN J WADE #2144: Total Transactions			\$5,730.91
Total Transactions for This Period			\$5,730.91
Fees			
Trans Date	Post Date	Description	Amount
Total Fees for This Period			\$0.00
Interest Charged			
Interest Charge on Purchases			\$275.61
Interest Charge on Cash Advances			\$0.00
Interest Charge on Other Balances			\$0.00
Total Interest for This Period			\$275.61
Totals Year-to-Date			
Total Fees charged			\$0.00
Total Interest charged			\$1,137.82

Transactions			
Visit capitalone.com to see detailed transactions.			
NATHAN J WADE #2144: Payments, Credits and Adjustments			
Trans Date	Post Date	Description	Amount
Oct 1	Oct 1	CAPITAL ONE ONLINE PYMTAuthDate 01-Oct	-\$1,500.00
Oct 13	Oct 13	ELECTRONIC PAYMENT	-\$5,000.00
NATHAN J WADE #2144: Transactions			
Trans Date	Post Date	Description	Amount
Sep 23	Sep 24	SQ *COPY CENTRAL. INCAAtlantaGA	\$212.60
Sep 23	Sep 26	AUDI ATLANTAATLANTAGA	\$6,014.65
Oct 1	Oct 3	ETT*AlightBatonRougeRENT801-8775491IL	\$606.20
Oct 4	Oct 5	ROYAL CARIBBEAN CRUISES800-327-6700FL	\$1,387.70
Oct 4	Oct 5	ROYAL CARIBBEAN CRUISES800-327-6700FL	\$1,284.85
Oct 4	Oct 5	AMERICAN AIR0012341816759FORT WORTH TX TK#: 0012341816759PSGR: BOWMAN/CLARA ORIG: IAH, DEST: MIA, S/O: O, CARRIER: AA, SVC: N ORIG: MIA, DEST: DFW, S/O: O, CARRIER: AA, SVC: V ORIG: DFW, DEST: IAH, S/O: O, CARRIER: AA, SVC: VO	\$413.20
Oct 4	Oct 5	AMERICAN AIR0012341865331FORT WORTH TX TK#: 0012341865331PSGR: WADE/NATHAN ORIG: ATL, DEST: MIA, S/O: X, CARRIER: AA, SVC: G ORIG: MIA, DEST: ATL, S/O: X, CARRIER: AA, SVC: L	\$477.21
Oct 4	Oct 5	AMERICAN AIR0012341865332FORT WORTH TX TK#: 0012341865332PSGR: WILLIS/FANI ORIG: ATL, DEST: MIA, S/O: X, CARRIER: AA, SVC: G ORIG: MIA, DEST: ATL, S/O: X, CARRIER: AA, SVC: L	\$477.21
Oct 5	Oct 6	VACATION EXPRESS800-309-4717GA	\$3,835.26
Oct 6	Oct 7	WM SUPERCENTER #1181MARIETTAGA	\$315.88
Oct 9	Oct 10	AT&T PM60 16425JASPERGA	\$101.45
Oct 9	Oct 10	AT&T PM60 16425JASPERGA	\$144.88
Oct 9	Oct 11	HOLIDAY INN EXP WOODSTOCKWOODSTOCKGA	\$226.16
Oct 11	Oct 13	AMERICAN AIR0010613893837FORT WORTH TX TK#: 0010613893837PSGR: WADE/NATHAN ORIG: RVU, DEST: FEE, S/O: O, CARRIER: AA, SVC: Y	\$62.50
Oct 11	Oct 13	AMERICAN AIR0010613893838FORT WORTH TX TK#: 0010613893838PSGR: WILLIS/FANI ORIG: RVU, DEST: FEE, S/O: O, CARRIER: AA, SVC: Y	\$61.24
Oct 11	Oct 13	AMERICAN AIR0010613895925FORT WORTH TX TK#: 0010613895925PSGR: WADE/NATHAN J ORIG: RVU, DEST: FEE, S/O: O, CARRIER: AA, SVC: Y	\$61.72
Oct 11	Oct 13	AMERICAN AIR0010613895926FORT WORTH TX TK#: 0010613895926PSGR: WILLIS/FANI T	\$61.72

Additional Information on the next page

**IN THE SUPERIOR COURT OF COBB COUNTY
STATE OF GEORGIA**

Nathan Wade,


Plaintiff(s),

Case No.: 21-1-08166

vs.

Joycelyn Wade,

Defendant(s).


Connie Taylor, Clerk of Superior Court
Cobb County, Georgia

AFFIDAVIT OF SERVICE

Personally appeared before me the undersigned officer duly authorized to administer oaths, Danny Davidson, who, after being duly sworn, deposes and states the following:

1.

Affiant states that he/she is appointed by this Court to serve process. The statements made are true and correct and are based upon my personal knowledge.

2.

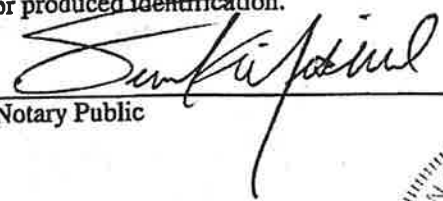
I served Ms. Fani T. Willis with a Witness Subpoena Deposition by leaving the documents with Tia Green, Executive Assistant to District Attorney of Ms. Fani T. Willis at said person's place of employment/place of business located at 136 Pryor St. SW, Atlanta, GA 30303 on January 08, 2024 at 11:57 AM.

Description of person process was left with:

Sex: Female - Ethnicity: African American - Hair: Black - Age: 40-45 - Height: 5ft 09in - Weight: 170 lbs

Comments: Authorized to accept service.

Signed and sworn to before me on
this 9 day of January, 2024
by an affiant who is personally known to me
or produced identification.


Notary Public


Danny Davidson
Express Legal Services LLC
860 Johnson Ferry Rd.
Atlanta, GA 30342
(678) 648-6330



RESPONDENT'S
EXHIBIT

B

5149841

DEPOSITION

TO WITNESS:

NAME: Ms. Fani T. Willis
ADDRESS: 141 Pryor Street SW
Atlanta, GA 30303

DIVISION: CIVIL

CRIMINAL

CASE NO.: 21-1-08166 (Nathan J. Wade v. Joycelyn Wade)

YOU ARE COMMANDED that, laying all business aside, you be and appear at the time set forth below to testify at a deposition to be taken in this case. If you are an organization that is not a party in this case, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

Deponent's romantic relationship with Plaintiff.
- videotaped + court reporter

PLACE: Hastings Shadmehru LLC
3650 Mansell Road
Suite 475
Alpharetta, GA 30022

DATE AND TIME: January 23, 2024 @ 10am

Production: You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and permit their inspection, copying, testing, or sampling of the material, or those set forth in an attachment: _____



HEREIN FAIL NOT UNDER PENALTY OF LAW.

Witness my hand and the seal of this court, this the 18th day of January, 2024.

Connie Taylor, Clerk, Superior Court of Cobb County.

[Signature]
Signature of Clerk or Deputy Clerk

OR

Attorney of Record

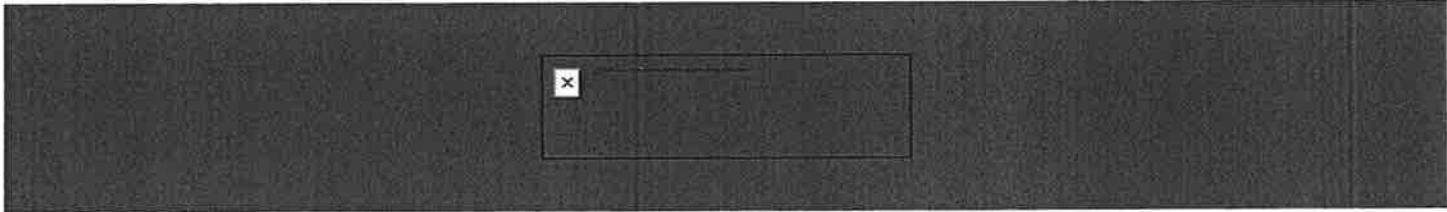
If you have questions, contact:
Attorney's Name: Andrea Duer Hastings
Telephone No.: 770-641-8200
Address: 3650 Mansell Rd Ste 475
Alpharetta, GA 30022
andee@hstfamilylaw.com



Pursuant to O.C.G.A. 24-13-21 a subpoena must be completed prior to being served on a witness. Any person misusing a subpoena is subject to punishment for contempt of court and may be fined not more than \$300.00 and imprisoned for not more than 20 days, or both. Witnesses may contact the Office of the Clerk of Court, telephone 770-528-1300 to verify that this subpoena was issued for a valid case.

Stephanie Weil

From: TrackingUpdates@fedex.com
Sent: Friday, January 19, 2024 9:28 AM
To: Stephanie Weil
Subject: FedEx Shipment 774864384807: Your package has been delivered



Hi. Your package was delivered Fri, 01/19/2024 at 9:20am.



Delivered to 185 CENTRAL AVE SW, ATLANTA, GA 30303
Received by M.ONIEL

OBTAIN PROOF OF DELIVERY

How was your delivery ?



TRACKING NUMBER [774864384807](#)

FROM Hastings Shadmehry LLC
3650 Mansell Road Ste 475
Alpharetta, GA, US, 30022

TO Ms. Fani T. Willis
141 Pryor Street SW
ATLANTA, GA, US, 30303

INVOICE NUMBER Wade 2723-01

SHIP DATE Thu 1/18/2024 07:13 PM

DELIVERED TO Mailroom

PACKAGING TYPE FedEx Envelope

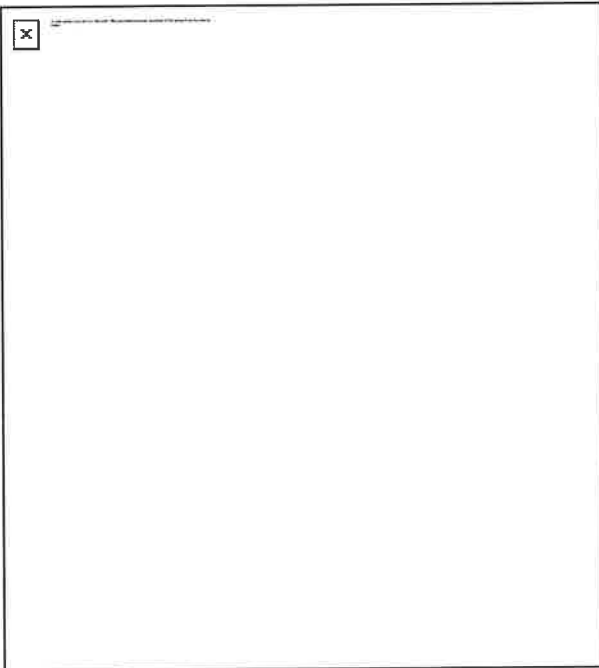
ORIGIN Alpharetta, GA, US, 30022

DESTINATION ATLANTA, GA, US, 30303

NUMBER OF PIECES 1

TOTAL SHIPMENT WEIGHT 0.50 LB

SERVICE TYPE FedEx Priority Overnight



Notifications, from start to finish

Get push notifications when you pair FedEx Delivery Manager® with the FedEx® Mobile app. You can activate alerts in the app to track your package. Then listen for the virtual doorbell chime that lets you know your package was delivered.

DOWNLOAD THE MOBILE APP