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BY: C. BEALE  
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MELISSA PINNELL  
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PICCARRETA DAVIS PC  
145 South Sixth Avenue  
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Michael L. Piccarreta  
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Attorney for Defendant

-and-

WRIGHT STANISH & WINCKLER  
300 S. Fourth Street, Suite 701  
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(702) 382-2004  
Attorney for Defendant

IN THE SUPERIOR COURT OF THE STATE OF ARIZONA  
IN AND FOR THE COUNTY OF MOHAVE

STATE OF ARIZONA,	)	NO. CR-2007-953
	)	
Plaintiff,	)	DEFENDANT JEFFS' MOTION
	)	FOR SUBPOENA <i>DUCES TECUM</i>
vs.	)	
	)	
WARREN STEED JEFFS,	)	[Oral Argument Requested]
	)	
Defendant.	)	[Hon. Steven F. Conn]
	)	

Pursuant to Rules 15 1(g) and 15 3(c) of the Arizona Rules of Criminal Procedure and A.R.S. § 13-4071, defendant, Warren Jeffs, by and through his undersigned counsel, respectfully requests this Court to order the issuance of a subpoena *duces tecum* directed to the Custodian of Records of the following Hildale Health Services entities:

- 1 Hildale Health Services Center Annex
- 20 South Colvin Street
- Colorado City, AZ 86201

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- 2. Hildale Family Clinic  
1070 North Hildale Street  
Hildale, UT 84784
- 3. Women/Well Child Care  
1065 North Hildale Street  
Hildale, UT 84784
- 4. Hildale Birth Center  
1065 North Hildale Street  
Hildale, UT 84784


Defendant is requesting that all of the above Hildale Health Services entities produce copies of all medical records, business records, and any other documents relating to the treatment of \_\_\_\_\_ for any miscarriage or other problem relating to pregnancy for which she may have been treated between December 21, 2001, through September 30, 2003. \_\_\_\_\_ has waived any privilege relating to these documents by revealing this information in her interview with law enforcement authorities on May 3, 2007, on pages 41-44 of that interview.<sup>1</sup> The requested items are obviously relevant because they relate to \_\_\_\_\_ claims about having sexual activity during the timeframes set forth in the indictment. The defendant has substantial need for the requested materials in the preparation of his defense and he is unable without undue hardship to obtain the substantial equivalent of the requested items by other means.


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<sup>1</sup> In addition to waiving any privilege, it appears that \_\_\_\_\_ may have made false statements about having as many as 11 miscarriages.

1 RESPECTFULLY SUBMITTED this 25th day of April, 2008.

2 WRIGHT STANISH & WINCKLER PICCARRETA DAVIS PC

3  
4 By   
5 Richard A. Wright  
6 Attorney for Warren Jeffs

By   
Michael L. Piccarreta  
Jefferson Keenan  
Attorneys for Warren Jeffs

7 Copy of the foregoing mailed  
8 this 28th day of April, 2008, to:

9 Clerk of Mohave County Superior Court  
10 401 East Spring Street  
11 Kingman, AZ 86401

12 Copy of the foregoing faxed and mailed  
13 this 28th day of April, 2008, to:

14 Hon. Steven F. Conn  
15 Mohave County Superior Court  
16 401 East Spring Street  
17 Kingman, AZ 86401  
18 Fax: 928-753-8938

19 Copy of the foregoing emailed and  
20 mailed this 28th day of April, 2008, to:

21 Matthew J. Smith, Esq.  
22 Mohave County Attorney's Office  
23 315 North Fourth Street  
24 P.O. Box 7000  
25 Kingman, AZ 86402-7000  
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