

It's a SCAM; a FORGERY!

KILGORE

FOURTH CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE

Docket No. 134338
Bar members/criminals had
absolutely NO business to access my
family's confidential records!

MOTION TO COMPEL PRODUCTION OF DOCUMENTS

FILED
2016 APR 14 PM 3:41
JANE HAMMOND
CLERK
FOURTH CIRCUIT COURT

~~Carl E. Booth, through counsel, moves the Court to compel Sanyia S. Booth, to provide~~

response to the Requests for Production of Documents and in support of the motion, he will
show as follows:

1. On February 3, 2016, Requests for Production of Documents were provided to
Jerry Givens, [REDACTED] (Attached is a
copy the Stamps.com information showing the mailing and the first and signature
page of the Requests for Production of Documents showing it was mailed on the
applicable date).

2. On February 18, 2016, another copy of the Requests for Production of Documents
was sent to Camilla Saunders, who had replaced Jerry Givens [REDACTED]
[REDACTED] (Attached is a copy of the email showing that this was sent to
Ms. Saunders at her request in Word form so she could use it to respond).

3. On March 10, 2016, a copy of the Requests for Production were provided to
Michael Kilgore, [REDACTED] (Attached is a copy of the email
showing that this was sent to Mr. Kilgore at his request in Word form so he could
use it to respond).

4. In addition, a Notice of Deposition was given for depositions scheduled for March
14, 2016 at 9:00 a.m. Attached to the Notice of Deposition was a list of items to
be brought to the deposition. (Attached is a copy of the Notice of Deposition with
the attachment).

Greg
McMillan
had the
audacity to
LIE, to pose
as a fricking
"Court" via
Duffey's
FORGERY!
McMillan
belongs
behind bars
for the rest
of his
disgusting
existence!

**Criminals posing as "Officers of the Court" WITHOUT a damn
case in "judge" of nobody, Greg McMillan's crime hub!**

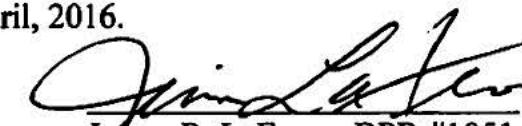
5. At the deposition on Tuesday, March 15, 2016 at 8:00 a.m., which had been rescheduled at the request of [REDACTED], Michael Kilgore during the ~~hearing~~ of March 11, 2016, no documents meeting the criteria were provided.

~~Ms. Booth~~ provided documents as follows:

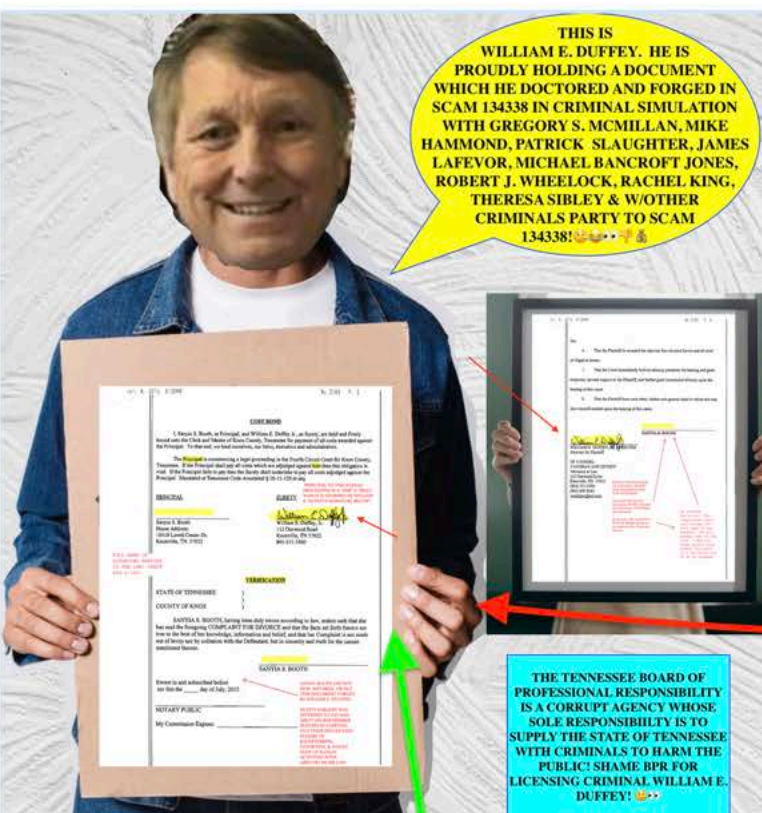


Therefore, ~~Carl E. Booth~~ respectfully moves the Court issue an Order compelling ~~Sanya~~ ~~S. Booth~~ to provide the documents within a reasonable time but no more than seven days, given the period of time she has already had, and that she be required to pay the attorney's fees and costs related to this motion.

Respectfully submitted this 14 day of April, 2016.


James R. LaFavor, BPR #1051
Attorney for Carl E. Booth
LAFEVOR and SLAUGHTER
1900 First Tennessee Plaza
800 S. Gay Street
Knoxville, TN 37929
(865) 637-6258

Michael B. Jones
Florida Bar No: 334405
Pro Hoc Vice
The Wheelock Law Firm
7601 Della Drive, Ste 19
Orlando, FL 32819
Telephone: (407) 648 5742



**IT'S NOT A "COURT" IT'S
A SCAM!**



~~IN THE FOURTH CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE~~

SANYIA S. BOOTH,

Docket No. 134338

CARL E. BOOTH,

IT'S A FORGERY

This is the
hideous POS
FRAUDSTER, Greg
McMillan, the LEAD
criminal

~~**FIRST REQUEST FOR PRODUCTION OF DOCUMENTS
PROPOUNDED TO PLAINTIFF/COUNTER DEFENDANT**~~

Pursuant to Tennessee Rule of Civil Procedure 34, [REDACTED], Carl E.

Booth, hereby requires that [REDACTED], Sanyia S. Booth, produce copies or

produce for inspection and copying the documents listed below at the offices of James R.

LaFevor, LaFevor & Slaughter, 800 S. Gay Street, Ste. 1900, Knoxville, Tennessee, 37929 on or

before the expiration of thirty (30) days from receipt of the Requests herein. These requests are

continuing in nature and your responses should be supplemented as provided by law.

For the purposes of this request, unless specified otherwise, the documents and records to

be provided are from January 1, 2012 to the date that you provide the documents.

For the purposes of this request, the following definitions apply:

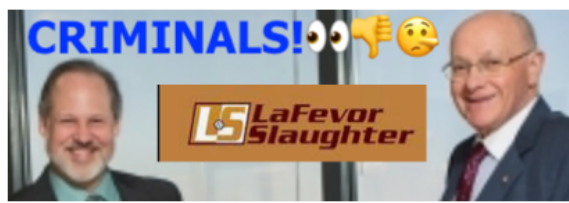
- A. "anyone else" includes (1) family members as defined herein, (2) any other person anywhere in the world, and (3) any company, corporation, partnership, proprietorship, limited liability company, non-profit or non-governmental agency, or any other similar business, governmental, or non-profit/non-governmental entity; and may describe one or more persons and/or entities.
- B. "anything of value" means funds as defined herein, real property, personal property, or any other item of any worth including nominal value.
- C. "documents" "records" "information" and/or similar words include, without limitation, items and/or writings on paper or stored electronically (in a computer, smart phone, smart tablet, a physical storage device of any type, on-line, in "the

This fraudulent
document consists of
ONLY 2 pages, even
though, it is suggested
by the Bar member
CRIMINALS that there
are nine pages


Page 1 of 9

What you see here is SOB criminals
aka Bar members obtaining the
confidential information of my
family members via William E.
Duffey's FORGERY!

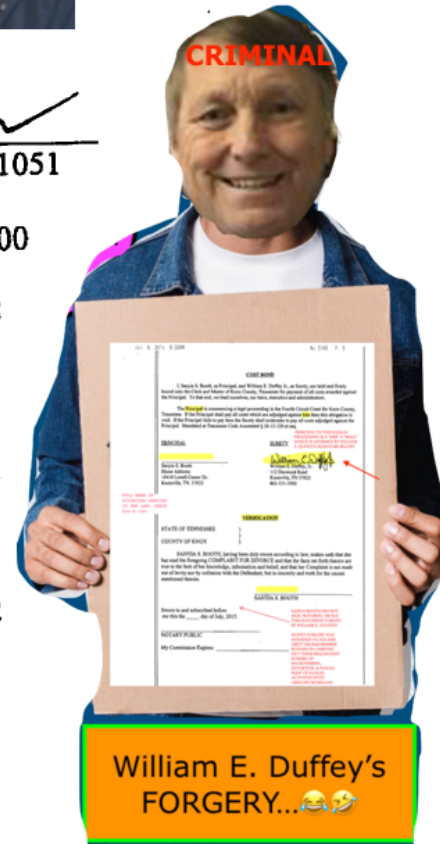
ATTACHMENT ONE PAGE TWO



Respectfully submitted this 12th day of February, 2016.


James R. LaFavor, BPR 001051
Attorney for Carl E. Booth
800 S. Gay Street, Suite 1900
Knoxville, TN 37929
Telephone: (865) 637-6258

Michael B. Jones
Florida Bar No: 334405
Pro Hoc Vice
The Wheelock Law Firm
7601 Della Drive, Ste 19
Orlando, FL 32819
Telephone: (407) 648 5742



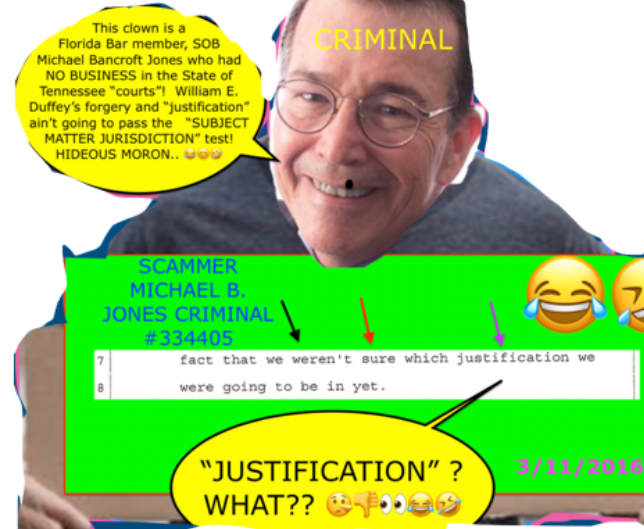
CERTIFICATE OF SERVICE

This is to certify that a true copy of the foregoing First Request for Production of Documents Propounded to [REDACTED] has been placed in the United States Mail, postage prepaid, to Jerry R. Givens, 4706 Papermill Drive, Knoxville, Tennessee 37909 on this 12th day of February, 2016.

To act as a local counsel to Michael B. Jones, James LaFavor & Patrick B. Slaughter need a "Complaint for Divorce" & a case to litigate in TN. I, Mrs. Sanyia Booth have NEVER SIGNED, NEVER NOTARIZED, AND NEVER FILED A COMPLAINT FOR DIVORCE IN TN! 😭

This is a fraudulent document demanding confidential information of my family members. Notice it begins with page "1 of 9" and jumps to page "9 of 9" - there are ONLY TWO total pages to this SCAM! 😡


James R. LaFavor



~~IN THE FOURTH CIRCUIT COURT FOR KNOX COUNTY, TENNESSEE~~
~~SANYIA S. BOOTH,~~

~~CARL E. BOOTH,~~

Docket No. 134338

SCAMMER GREG MCMILLAN

Exhibit A to Notice of Deposition



Pursuant to the Tennessee Rules of Civil Procedure and the Notice of Deposition served upon you, ~~Sanyia S. Booth~~ is required to bring the following items to the deposition currently scheduled for March 16, 2016 at 1:00 p.m.

1. The original of any documents requested in the Request for Production if not produced prior to the deposition.
2. The original of any video/audio tapes, DVDS or other electronic media if not produced prior to the deposition.
3. The original computer and hard drive if not produced prior to the deposition.
4. Any original title and registration for the 2012 Honda Odyssey van for Tennessee or any other state if not produced prior to the deposition.
5. Any original documents not produced on the attached Exhibit B, Request for Production of Documents.

It's a FORGERY; a SCAM

THIS IS MICHAEL BANCROFT JONES FBN#334405, THE LOWLIFE SCUMBAG CRIMINAL, A NON LAWYER MEANING HE IS NOT AUTHORIZED TO PRACTICE LAW TN & WAS NEVER LICENSED AS "PRO HAC VICE" PURSUANT TO TN

MICHAEL BANCROFT JONES IS A DANGER TO CHILDREN & FAMILIES! KEEP THIS MAN FAR FAR AWAY FROM YOUR LOVED ONES!

CRIMINALS

FLORIDA BAR LICENSES CRIMINALS! SHAME SHAME!

**Florida Bar No: 334405
Pro Hoc Vice
The Wheelock Law Firm
7601 Della Drive, Ste 19
Orlando, FL 32819
Telephone: (407) 648 5742**

650,000.00 IN NINE MONTHS IN TN SCAM 134338 EXTORTION FROM MY FAMILY WITHOUT THIS THUG BEING LICENSED IN THE STATE OF TN & WIOUT A CASE IN GREGORY S. MCMILLAN'S CRIME HUB! FLORIDA'S HUMAN GARBAGE

William E. Duffey's FORGERY...