



ELECTRONICALLY FILED
8/26/2026 10:54 AM
02-CV-2025-901925.00
CIRCUIT COURT OF
MOBILE COUNTY, ALABAMA
ASHLEIGH LONG, CLERK

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,

*

Plaintiff,

*

*

v.

CV-2025-901925

*

**SOUTH ALABAMA MEDICAL &
REHAB LLC, et al.**

*

*

NOTICE OF INTENT TO SERVE SUBPOENA ON NON-PARTY

Please take notice that upon the expiration of fifteen (15) days (or such other time as the Court has allowed) from the date of service of this notice, the Plaintiff, the State of Alabama, by and through the undersigned Assistant District Attorney for the Thirteenth Judicial Circuit, will apply to the clerk of this Court for issuance of the attached subpoena directed to the records custodian for the following entity who is not a party, to produce the documents or things at the time and place specified in the subpoena:

**Starnes, Davis, Florie, LLP
100 Brookwood Place, 7th Floor
Birmingham, AL 35209
and/or
11 North Water Street, Suite 20290
Mobile, AL 36602**

Respectfully submitted,

/s/ Clay T. Rossi

Clay T. Rossi (ROS045)

Assistant District Attorney

Mobile County District Attorney's Office
Mobile Government Plaza
205 Government Street, Suite C-701
Mobile, AL 36644-2501

CERTIFICATE OF SERVICE

I hereby certify that on the 26th day of August, 2026, electronically filed the foregoing with the Clerk of Court using the Alafile system, and that I hereby certify that I have mailed by placing a copy of same in the United States Mail, first-class postage prepaid and properly addressed, or sent via email, to those Alafile participants:

Cole R. Gresham, Esq.
 STARNES DAVIS FLORIE LLP
 100 Brookwood Place, Seventh Floor
 Birmingham, Alabama 35209
cgresham@starneslaw.com
Attorney for Defendants
 South Alabama Medical & Rehab LLC
 Chad Loveless
 Bryan Walters
 Michael Kent Plambeck
 Douglas Friedman
 Huntsville Medical & Rehab, LLC
 Homewood Medical, LLC
 Montgomery Medical & Rehab, LLC

Stephanie Wilson (pro se)
 8334 Clairmont Drive S
 Semmes, AL 36575

Frederick G. Helmsing, Jr., Esq.
 Thomas Hart Benton, III
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 11 North Water St., Ste. 1200
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Attorney for Defendants
 Dolinsky Law Group LLC
 Robert Dolinsky
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 1901 Sixth Ave N, Suite 1700
 Birmingham, AL 35203
hdodd@maynardnexsen.com
Attorney for Defendants
 Vacek Law Group PLLC
 John C. Baker

/s/ Clay T. Rossi

Assistant District Attorney

IN THE CIRCUIT COURT OF MOBILE COUNTY, ALABAMA

STATE OF ALABAMA,	)	
Plaintiff,	)	
	)	Case No. CV-2025-901925.00
v.	)	
	)	
SOUTH ALABAMA MEDICAL &	)	
REHAB LLC, et al.,	)	
Defendants.	)	

SUBPOENA FOR PRODUCTION OF DOCUMENTS UNDER RULE 45, ALA. R. CIV. P.

TO:

Starnes, Davis, Florie, LLP
100 Brookwood Place, 7th Floor
Birmingham, AL 35209
and/or
11 North Water Street, Suite 20290
Mobile, AL 36602

You are hereby commanded, at the instance of the State of Alabama (hereinafter “Plaintiff” or “State”), within five (5) days after service of this Subpoena, to produce and permit inspection and copying of true, correct, complete, and certified copies of any and all of the following documents, whether in electronic format or hard copy.

YOU ARE FURTHER ORDERED TO APPEAR before the Mobile County District Attorney, pursuant to the authority vested in him by § 8-19-9 of the Code of Alabama (1975), and to produce the true, correct, and complete copies of the following documents or records:

1. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) made in connection with **your matter #3796-0044284** from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor’s name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
2. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final

payments) for legal services rendered to or on behalf of **South Alabama Medical & Rehab, LLC** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:

- a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
3. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Chad Loveless** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
- a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
4. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Bryan Walters** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
- a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and

- d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
5. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Michael Kent Plambeck** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
6. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Dougals Friedman** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
7. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Huntsville Medical & Rehab, LLC** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;

- c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
- 8. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Homewood Medical, LLC** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
- 9. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including retainers, advances, interim payments, and final payments) for legal services rendered to or on behalf of **Montgomery Medical & Rehab, LLC** in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, from July 2025 to the present, including but not limited to:
 - a. Copies of all checks, wire-transfer records, ACH records, credit-card authorizations, or other instruments reflecting payment;
 - b. Payment ledgers, trust-account ledgers, or accounting records showing the payor's name, address, and the date and amount of each payment;
 - c. Any and all retainer and/or representation agreements, engagement letters, or third-party payment agreements; and
 - d. Correspondence or other records confirming the identity of any third-party payor or the arrangement under which fees are being paid by someone other than the named client.
- 10. Complete, true, and correct copies of any and all documents sufficient to identify the source(s) of all payments (including representation agreements, retainers, advances, interim payments, and final payments) for legal services in connection with the matter of *State of Alabama v. South Alabama Medical & Rehab, LLC*, 02-CV-2025-901925, concerning and/or related to payments made on or around the following dates:

- a. October 30, 2025
- b. December 10, 2025
- c. January 23, 2026
- d. March 13, 2026
- e. April 21, 2026

To the extent any document contains privileged narrative descriptions of legal services, you may redact only those specific narrative portions that reveal confidential attorney-client communications or protected work product. Produce all non-privileged payment-source information in unredacted form.

For any redaction or withholding, provide a privilege log identifying the date, document type, author/recipients, the nature of the redacted material (without revealing privileged content), and the specific privilege asserted.

PLEASE NOTE THAT ALL DOCUMENTS MUST BE ACCOMPANIED BY AN ORIGINAL CERTIFICATE OF AUTHENTICITY, WHICH SHALL BE FULLY EXECUTED BY THE RECORDS CUSTODIAN AND NOTARIZED.

You are further advised that other parties to the action in which this Subpoena has been issued have the right to be present at the time of such production or inspection. Please understand that this request is for ANY AND ALL RECORDS and should in no way be construed as a limited request.

You may comply with this Subpoena by delivering a copy of all records to the offices of the Mobile County District Attorney at the following location:

Mobile County District Attorney
 Mobile Government Plaza
 205 Government Street, Suite C-701
 Mobile, Alabama 36644-2501
ATTN: CLAY ROSSI

In accordance with the Health Insurance Portability and Accountability Act's requirements, a HIPAA Protective Order has been entered in this action (Doc. 73, Aug. 20, 2025), which Order authorizes this disclosure. Pursuant to Alabama Code § 12-21-6.1, the charges for researching and reproducing medical records shall not exceed one dollar (\$1.00) for each page of the first 25 pages and fifty cents (\$0.50) for each page in excess of 25 pages. The statute also provides that a search fee of not more than five dollars (\$5.00) may be charged, and that the actual cost of mailing records may also be charged.

In accordance with Rule 45, Ala. R. Civ. P., you are advised as follows:

(c) Protection of Persons Subject to Subpoenas.

(1) A party or an attorney responsible for the issuance and service of a subpoena shall take reasonable steps to avoid imposing undue burden or expense on a person subject to that subpoena.

The court from which the subpoena was issued shall enforce this duty and impose upon the party or attorney in breach of this duty an appropriate sanction, which may include, but is not limited to, lost earnings and a reasonable attorney fee.

(2)(A) A person commanded to produce and permit inspection and copying of designated books, papers, documents or tangible things, or inspection of premises need not appear in person at the place of production or inspection unless commanded to appear for deposition, hearing or trial.

(B) Subject to paragraph (d)(2) of this rule, a person commanded to produce and permit inspection and copying may, at any time before the time specified for compliance, serve upon the party or attorney designated in the subpoena written objection to inspection or copying of any or all of the designated materials or of the premises. If objection is made, the party serving the subpoena shall not be entitled to inspect and copy the materials or inspect the premises except pursuant to an order of the court by which the subpoena was issued.

(d) Duties in Responding to Subpoena.

(1) A person responding to a subpoena to produce documents shall produce them as they are kept in the usual course of business or shall organize and label them to correspond with the categories in the demand.

(2) When information subject to a subpoena is withheld on a claim that it is privileged or subject to protection as trial-preparation materials, the claim shall be made expressly and shall be supported by a description of the nature of the documents, communications, or things not produced that is sufficient to enable the demanding party to contest the claim.

Dated this ____ day of _____, 2026.

Respectfully submitted,

/s/ Clay T. Rossi

Clay T. Rossi (ROS045)

Assistant District Attorney

Mobile County District Attorney's Office
Mobile Government Plaza
205 Government Street, Suite C-701
Mobile, AL 36644-2501

TO THE APPOINTED PROCESS SERVER: You are ordered to serve this Subpoena on the above-named person at the address given and make return in the space provided.

CIRCUIT COURT CLERK

DATE ISSUED: _____

RETURN OF SERVICE

I hereby certify that I served a copy of the foregoing Subpoena on **Starnes, Davis, Florie, LLP** by certified mail / personal service (circle one) on this the _____ day of _____, 2026.

CERTIFICATE OF AUTHENTICITY

I hereby certify and affirm in writing that I am the _____ of **Starnes, Davis, Florie, LLP**, a business organized or operated pursuant to or under the laws of Alabama; that I am the custodian of the records; and that the attached or within copy of said records is an exact, full, true, and correct copy of said records requested.

Additionally, I certify that said records were made and kept in the usual and regular course of business, and that it was in the regular course of business that said records were made at the time such acts, transactions, occurrences, or events therein referred to occurred or arose, or within a reasonable time thereafter.

All of which I hereby certify and affirm on this _____ day of _____, 2026.

Custodian of Records

Sworn to and subscribed before me this _____ day of _____, 2026.

Notary Public

My Commission Expires: _____