

IN THE DISTRICT COURT OF LANCASTER COUNTY, NEBRASKA

STATE OF NEBRASKA)	Docket 666 Page 235
)	
Plaintiff,)	Case No. CR03-9000005
)	
v.)	
)	
JAMES M. SAYLOR)	Motion to Quash Subpoena
)	Issued to Crime Stoppers
)	
Defendant.)	
)	

Lincoln-Lancaster County Crime Stoppers, Inc., by and through its attorneys, Rembolt Ludtke LLP, moves the Court for an order, pursuant to Neb. Ct R. § 6-334(A)(c)(3), quashing the subpoena issued by Defendant against Crime Stoppers. In support of the motion, Crime Stoppers states:

1. Defendant is not entitled to discovery of the requested material as a matter of law.
2. The documents requested by Defendant are privileged pursuant to, without limitation, Neb. Rev. Stat. § 27-510.
3. The subpoena subjects Crime Stoppers to undue burden given the age of the materials requested.
4. Defendant has failed to allow a reasonable time for compliance with the subpoena.

WHEREFORE, Lincoln-Lancaster County Crime Stoppers, Inc. moves the Court for an order quashing the subpoena issued by Defendant against movant, for its attorneys' fees and costs as allowed by law, and providing for such other and further relief as the Court finds in the premises.

Dated: September 22, 2014

LINCOLN-LANCASTER COUNTY CRIME
STOPPERS, INC., Interested, Party / Movant

By: REMBOLT LUDTKE LLP
1201 Lincoln Mall, Suite 102
Lincoln, NE 68508
(402) 475-5100

By: /s/ Brian S. Kruse
Brian S. Kruse (21963)
bkruse@remboltlawfirm.com

Notice of Hearing

Notice is hereby given that the following motion will be called up for hearing before the Honorable Steven D. Burns, District Court Judge, in Courtroom No. ____ of the Justice and Law Enforcement Center, 575 South 10th Street, Lincoln, Nebraska, on _____ at _____, or as soon thereafter as can be heard by the Court.

/s/ Brian S. Kruse
Brian S. Kruse

Certificate of Service

The undersigned hereby certifies that I caused a true and correct copy of the foregoing to be sent by ordinary United States mail, first class postage prepaid, on September 22, 2014, addressed as shown below to the following:

/s/ Brian S. Kruse
Brian S. Kruse