

13.

Assets Transferred or Sold

From June 1, 2012 to present, have you sold, encumbered or further encumbered, transferred, assigned, given, pledged, liquidated or otherwise disposed of any interest in any securities (stocks, corporate bonds, mutual funds, municipal bonds, debentures, notes, commodities, etc.), any savings certificates or certificates of deposit, any gold or silver, any notes or other receivables, any furs, jewelry or precious or semi-precious gems, or any other assets (other than real estate) of value in excess of Four Hundred Ninety-Nine Dollars (\$499.00). If so, for each transaction or transfer, please specifically identify the asset(s), give the name of the purchaser or transferee thereof, the date of such transaction, and the exact amount or value of the proceeds or other consideration received by you.

14.

Business Interests

From June 1, 2012 to present, with respect to any business venture, whether it be a corporation, a general or limited partnership, sole partnership, joint venture, trust or otherwise, in which you have a financial interest, or in which you expect to have an interest within the next year, or from which you have received income, state the name of that business and the financial interest which you have or will have.

15.

Bank Accounts

For each bank account maintained or used by you, individually or jointly with any others, or maintained by you as a trustee or custodian, please state for the period from June 1, 2012 to present, the account number or each account, the names(s) in which each account is maintained

and the name and address of the bank or other institution at which each account is (was) held.

16.

Insurance

Identify all policies of insurance which name you as the principal insured.

17.

Property Transfer

Please list all transfers and/or gifts of property, both real and personal, which you have made since June 1, 2012, to any individual, trust, or legal entity, describing the property transferred and the consideration paid by such transferee.

18.

Plans to Acquire Property

As of the date of your receiving these Interrogatories, please state whether you have any interest in an option to acquire an interest in real property and, if so, state the terms of the option(s) the optionee(s), and give a description of the property subject to each option.

19.

Financial Advisor

Please list the name, address, and telephone number for your financial advisor.

20.

Other Properties

Other than the home in which you are now residing, by address, city, county, state, date acquired, method of acquisition (purchased, traded, given, inherited, etc.), name(s) on original deed by which you acquired your interest, name(s) in which property now held, original acquisition price, your opinion of the current fair market value, creditor name and current balance of each loan

or lien secured by the property, and date transferred, describe all real estate or real property in which you have owned or claimed any interest since June 1, 2012.

21.

Automobiles

By model year, make, model, VIN (Vehicle Identification Number), date first acquired, method of acquisition, person or entity from whom acquired, original amount paid to acquire, date transferred, amount received for transfer, name and address of each current creditor holding any lien against the same, account number of each current creditor holding any lien against the same, and current balance of each loan or lien against the same, describe all motor vehicles in which you have owned or claimed any interest since June 1, 2012.

22.

Investments

By name and address of the issuing company, date each was acquired, method of acquisition, acquisition price, number of current shares you hold, current market or cash value, list all stocks, bonds, debentures, mortgages, mutual funds certificates, securities, limited partnerships, investments, or trade options in which you hold, claim, or intend to seek any interest.

23.

Persons with Knowledge

Identify every person who has any knowledge related to your current financial circumstances, including knowledge of your current income, your current assets, your ownership of any real property, your tax returns, your debts, or your liabilities.

24.

Financial Records

List all financial records you have in your possession or to which you have online or web access regarding your current financial condition, including but not limited to bank statements, account statements, retirement statements, bank accounts (of any kind), pay stubs, tax returns, business records, credit card statements, loan statements, car loan statements, loan applications, closing statements, social security statements, etc.

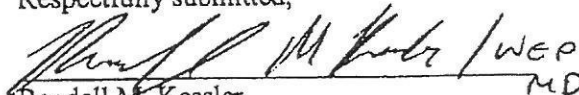
25.

Other Children

Please state the amount of child support you pay per month for any other child(ren) you have. Also include all amounts you pay for said child(ren), other than child support, including but not limited to any and all school expenses, extracurricular activities, entertainment, summer camps, and medical/dental expenses.

Dated this 13 day of June, 2014.

Respectfully submitted,


Randall M. Kessler

Georgia State Bar No. 004170

KESSLER & SOLOMIANY, LLC
Attorneys for Respondent
Centennial Tower
101 Marietta Street, Suite 3500
Atlanta, Georgia 30303
(404) 688-8810
rkessler@ksfamilylaw.com

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

C.B. BRIDGES,

Petitioner,

and

TAMIKA FULLER,

Respondent.

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CIVIL ACTION

FILE NO. 2013CV240141

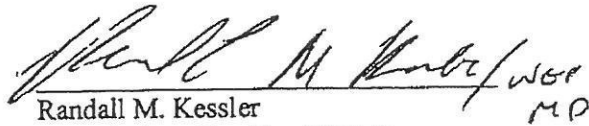
CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for opposing party in the foregoing matter with a copy of this pleading by E-mail and US Mail delivery to:

Tanya Mitchell Graham, Esq.
Tanya Mitchell Graham, PC
4002 Highway 78, Suite 530-233
Snellville, GA 30039

John C. Mayoue, Esq.
Mayoue Gray Eittrheim, PC
5229 Roswell Road
Atlanta, GA 30342

This 13 day of June, 2014.


MP

Randall M. Kessler
Georgia State Bar No: 004170
rkessler@ksfamilylaw.com

Kessler & Solomiany, LLC
Attorneys for Respondent
Centennial Tower
101 Marietta Street, Suite 3500
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ORIGINAL

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

C.B. BRIDGES,

Petitioner,

and

TAMIKA FULLER,

Respondent.

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CIVIL ACTION

FILE NO. 2013CV240141

NOTICE TO PRODUCE AND REQUEST FOR PRODUCTION OF DOCUMENTS

To: C.B. Bridges, Petitioner,
By and through his attorneys of record
Tanya Mitchell Graham, Esq.
Tanya Mitchell Graham, PC
4002 Highway 78, Suite 530-233
Snellville, GA 30039
and
John C. Mayoue, Esq.
Mayoue Gray Eittreim, PC
5229 Roswell Road
Atlanta, GA 30342

You are hereby served with this Notice to Produce and Request for Production of Documents pursuant to O.C.G.A. § 24-10-26 and O.C.G.A. § 9-11-34.

You are requested to produce the documents described in Exhibit "A" attached hereto at undersigned counsel's office located at 101 Marietta St., Suite 3500, Atlanta, Georgia, 30303 within the discovery time frame provided by law, as well as at any hearing or deposition conducted in the above-styled case. Any documents so produced shall be subject to inspection and copying by undersigned counsel.


"Document" shall be defined as any medium or complete duplicate of any medium in which the requested information appears, whether in a handwritten document, typed document, computer file, videotape, audiotape, or in some other format.



theJasmineBRAND.com

You are subject to an ongoing duty to supplement your responses to this Notice to Produce and Request for Production of Documents as detailed in O.C.G.A. § 9-11-26(e).

This 13 day of June, 2014.


Randall M. Kessler
Georgia State Bar No. 004170

KESSLER & SOLOMIANY, LLC
Attorneys for Respondent
Centennial Tower
101 Marietta Street, Suite 3500
Atlanta, Georgia 30303
(404) 688-8810
rkessler@ksfamilylaw.com

EXHIBIT A

1. Complete copies of any and all federal and state income tax returns filed by you alone or jointly with any other individual(s) for tax years 2012 and 2013. This request encompasses any and all worksheets, W-2's, 1099 forms, K-1's, or other supportive documents generated for each such return.
2. From June 1, 2012, through the present, any and all pay stubs, vouchers, expense reports (including any and all supportive documentation submitted with said reports), or other documents showing income or benefits of employment of any kind received by you. For the purpose of this request, "income or benefits of employment" shall include, but not be limited to, salary, wages, unemployment compensation, severance pay, dividends, bonuses, advances, employer-funded loans, sick pay, paid time off pay, travel reimbursement, entertainment reimbursement, meal reimbursement, cell phone reimbursement, automobile use, automobile reimbursement, or any other form of employer-reimbursed expenses.
3. Any and all employment contracts or offers of employment to which you are or were a party.
4. Any and all copies of personal financial and/or net worth statements prepared by you or for you (particularly any such statements submitted by you to any bank, finance company or any other lending institution) from June 1, 2012 through present, and copies of statements that support the current values.
5. A copy of your Domestic Relations Financial Affidavit as required under Uniform Superior Court Rule 24 as well as any and all non-privileged, non-work product documents relied upon to generate its contents.
6. With respect to any corporation, S-corporation, partnership, limited liability corporation, limited liability partnership, or other business entity in which you have or had an interest of ten percent (10%) or greater since June 1, 2012, or have or had any managerial or supervisory role (including, but not limited to, an officer role):
 - a) any and all articles of incorporation, corporate minute books, and / or by-laws related to said entity;
 - b) any and all shareholder or partnership agreements related to said entity;
 - c) any and all stock certificates or other documents demonstrating your interest in said entity;

- d) any and all documents evidencing, reflecting, or otherwise related to credit card accounts and debit card accounts, including, but not limited to, monthly statements showing the charges and payments made on such account(s);
- e) any and all records of checking accounts, saving accounts, or other accounts with any financial institution of any kind that are or were maintained or used in connection with said entity (including cancelled checks, checkbooks, checkbook stubs or registers and monthly bank statements);
- f) cash receipts records;
- g) cash disbursement records;
- h) accounts receivable ledgers;
- i) any and all financial statements related to said entity;
- j) any and all profit and loss statements related to said entity;
- k) any and all balance sheets related to said entity; and / or
- l) any and all federal or state tax returns related to said entity.
7. From June 1, 2012, through the present, any and all records of checking and / or savings accounts maintained by you, whether in your name alone or jointly with any other individual(s), whether domestic or foreign, and whether currently active or closed. For the purpose of this request, such records shall be deemed to include, but not be limited to, any and all monthly statements, cancelled checks, deposit slips and / or deposit books.
8. From June 1, 2012, through the present, any and all documents evidencing, reflecting, or otherwise related to any and all money market accounts, liquid asset accounts, cash management accounts, certificates of deposit, treasury bills, notes or bonds, commercial paper or other cash equivalents, and / or mutual fund accounts held in your name alone or jointly with any other individual(s), or for which you are a signatory or beneficial owner, whether foreign or domestic and whether currently held or cancelled, closed, sold, exchanged, or donated. For the purpose of this request, such documents shall include, but not be limited to, statements, checkbook stubs or registers, and / or cancelled checks.
9. From June 1, 2012, through the present, any and all documents evidencing, reflecting, or otherwise related to your interest in any securities of any nature whatsoever, including, but not limited to, stock certificates and / or any and all statements from any financial institution, stockbroker or other third party with buying or selling authority on your behalf.

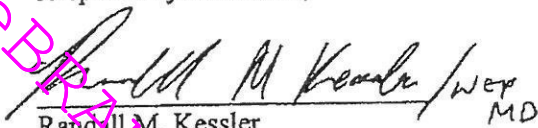
10. From June 1, 2012, through the present, any and all documents evidencing, reflecting, or otherwise related to profit sharing plans, pension plans, KEOGH plans, individual retirement accounts, 401-k plans, employee stock option plans, annuities, and / or other retirement vehicles or deferred compensation arrangements of any nature in which you have or have had an interest. For the purpose of this request, such documents shall include, but not be limited to, the following:
- a) any and all documents describing or summarizing the plan or account and the terms and conditions under which it is maintained;
 - b) any and all periodic statements demonstrating the value of your interest in such a plan or account;
 - c) any and all documents reflecting the present beneficiaries of your interest in each such plan, account, or deferred compensation arrangement;
 - d) any and all elections or waiver forms signed by you or by Petitioner with respect to the receipt of benefits related to each such plan, account, or deferred compensation arrangement; and / or
 - e) any qualified domestic relations order in effect with respect to your interest in a particular retirement plan.
11. Any and all warranty deeds, quitclaim deeds, deeds to secure debt, closing statements, and / or other documents evidencing, reflecting or otherwise related to the acquisition or sale of real property in your name alone or jointly with any other individual(s).
12. Any and all real estate leases or lease/purchase agreements showing you as lessor or lessee.
13. Any and all trust agreements in which you hold or held any beneficial interest of any kind, or of which you are or were a settlor or a trustee, and any and all records of related trust distributions from June 1, 2012, to date.
14. Any and all documents evidencing, reflecting or otherwise related to mortgages, lines of credit and / or other loans held in your name, whether alone or jointly with any other individual(s) and whether currently owed or paid off; provided, however, that this request does not apply to any amounts owed on credit card accounts.
15. From June 1, 2012, through the present, any and all credit card statements for credit cards issued to you in your name alone or jointly with any other individual(s), firm or corporation.

16. All receipts, sales or purchase notices or other documents reflecting your purchase or sale of any tangible personal property including, but not limited to, any gold, silver, jewelry, watches, furs, automobiles, boats, motorcycles, stereo equipment, televisions, cameras, video equipment, appliances, or any other valuable tangible asset (cost exceeding \$499.00) of any nature (excluding real estate) for the period from June 1, 2012 to present.
17. Any and all financial statements, operating statements, profit and loss statements, statements of assets and liabilities and balance sheets prepared by corporate accountant and/or auditor with respect to all properties or business in which you have an ownership interest of 10% or more, including any corporations, partnerships, or joint ventures.
18. Any and all bills for rentals of any and all safe deposit boxes with any bank or lending institutions from June 1, 2012 until present.
19. The contents of any and all safe deposit boxes maintained by you individually and/or jointly with any other or others as of the date of service of this Notice to Produce. In lieu of the actual contents, you may choose to produce a true and complete list of the contents.
20. All medical and/or dental insurance policies and booklets insuring you and any of your children, individually and/or jointly with any other person or persons, as well as all premium notices and correspondence received by you in the last year in connection with same.
21. All life insurance policies and certificates on your life.
22. Your Child Support Worksheet and any and all schedules required pursuant to O.C.G.A. § 19-6-15 and Uniform Superior Court Rule 24.2.
23. From June 1, 2012, through the present, any and all documents evidencing, reflecting or otherwise related to any and all special expenses, adjustments, and / or deviations that you list on your Child Support Worksheet and / or any amendments thereto, including those documents that you contend demonstrate that such special expenses, adjustments, and / or deviations serve(s) the best interest of the children at issue.
24. In accordance with the case of Dikeman v. Mary A. Stearns, P.C., 253 Ga. App. 646 (2002), please produce all documentary and physical evidence which you intend to introduce in any hearing or trial of this case.
25. Your Last Will and Testament and any Codicils relating thereto.

26. A monthly budget of your living expenses including, but not limited to, rent or mortgage payments, utilities, food, clothing, laundry and dry cleaning, insurance payments, prescription drug and medical expenses, transportation costs and entertainment.
27. Any and all tangible evidence, including but not limited to statements of account, deeds, notes, trust agreements, contracts, agreements, letters, memoranda, notices, or other documents relating to any interest you may have in any property, tangible or intangible, which interest in property has not been produced by you pursuant to any other paragraph in this Notice to Produce and Request for Documents.
28. A net worth statement for yourself as of the present date.
29. Any and all documents and things identified in your response to Respondent's First Continuing Interrogatories to Petitioner, or referred to by you in responding to Respondent's First Continuing Interrogatories to Petitioner.

Dated this 13 day of June, 2014.

Respectfully submitted,


Randall M. Kessler
Georgia State Bar No. 004170

KESSLER & SOLOMIANY, LLC
Attorneys for Respondent
Centennial Tower
101 Marietta Street, Suite 3500
Atlanta, Georgia 30303
(404) 688-8810
rkessler@ksfamilylaw.com

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

C.B. BRIDGES,

Petitioner,

and

TAMIKA FULLER,

Respondent.

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CIVIL ACTION

FILE NO. 2013CV240141

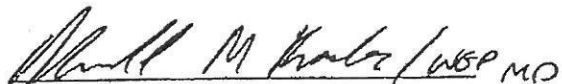
CERTIFICATE OF SERVICE

This is to certify that I have this day served counsel for opposing party in the foregoing matter with a copy of this pleading by E-mail and US Mail delivery to:

Tanya Mitchell Graham, Esq.
Tanya Mitchell Graham, PC
4002 Highway 78, Suite 530-233
Snellville, GA 30039

John C. Mayoue, Esq.
Mayoue Gray Eittrheim, PC
5229 Roswell Road
Atlanta, GA 30342

This 13 day of June, 2014.



Randall M. Kessler
Georgia State Bar No: 004170
rkessler@ksfamilylaw.com


Kessler & Solomiany, LLC
Attorneys for Respondent
Centennial Tower
101 Marietta Street, Suite 3500
Atlanta, Georgia 30303
(404) 688-8810
www.ksfamilylaw.com

bring this Motion to Compel and defend against Petitioner's Motion for Protective Order be borne by Petitioner.

WHEREFORE, Respondent respectfully prays:

- A. That the Court order Petitioner to respond to Respondent's Notice to Produce and Request for Production and Interrogatories;
- B. That the Court set a Rule Nisi for the Petitioner to show cause why the relief requested herein should not be granted;
- C. That the Court deny Petitioner's Motion for Protective Order;
- D. That the Court award reasonable expenses, including attorney's fees and expenses to Respondent incurred as a result of having to bring this Motion to Compel and defend against Petitioner's Motion for Protective Order; and,
- E. That the Court grant Respondent such additional relief as the Court deems necessary, equitable and just under the circumstances.

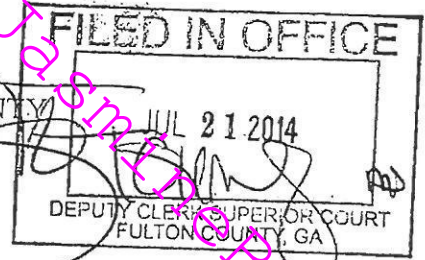
Respectfully submitted this 18th day of July, 2014.


Randall M. Kessler SEP 20 2014 7:51 PM
Georgia State Bar No. 004170

KESSLER & SOLOMIANY, LLC
Attorneys for Respondent/Husband
Centennial Tower
Suite 3500, 101 Marietta Street
Atlanta, Georgia 30303
(404) 688-8810
www.ksfamilylaw.com
rkessler@ksfamilylaw.com

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION



C.B. BRIDGES,)
)
Petitioner,)
v.)
)
TAMIKA FULLER,)
)
Respondent.)

CIVIL ACTION NO. 2013CV240141

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

COMES NOW, C.B. BRIDGES, Petitioner in the above-captioned action and, pursuant to Superior Court Uniform Rule 5.2, certifies that the **Petitioner's Responses to Respondent's First Interrogatories and Petitioner's Responses to Respondent's Notice to Produce and Request for Production of Documents** were served upon counsel for Respondent via electronic mail and U.S. Mail with adequate postage affixed thereon and addressed to:

Randall M. Kessler, Esq.,
Kessler & Solomiany, LLC
101 Marietta St., Suite 5500
Atlanta, GA 30303

This 16th day of July, 2014

THE LAW OFFICE OF
TANYA MITCHELL GRAHAM, P.C.

Tanya Mitchell Graham (w/ exp. perm. MPH)
TANYA MITCHELL GRAHAM
Georgia Bar No. 513595
Attorneys for Petitioner

4002 Highway 78, Suite 530-233
Snellville, Georgia 30039
770.469.0802 telephone
770.469.9868 facsimile
tmgesq@tanyamitchellgraham.com

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John C. Mayoue, Esq.
MAYOUE GRAY BITTREIM, P.C.
5229 Roswell Road
Atlanta, Georgia 30342
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jmayoue@mgefamilylaw.com

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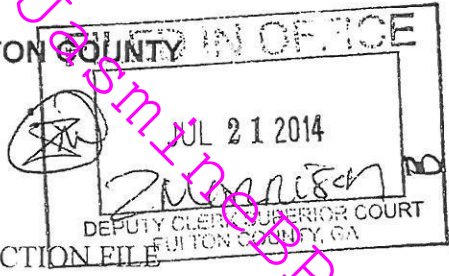
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C.B. Bridges v. Tamika Fuller
Superior Court of Fulton County
Civil Action File No. 2013CV240141
Rule 5.2 Certificate of Service of Discovery

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



C. B. BRIDGES,

Petitioner,

v.

TAMIKA FULLER,

Respondent.

CIVIL ACTION FILE

NO.: 2013CV240141

DISCOVERY CERTIFICATE OF SERVICE

This is to certify that I have this day served:

Randall M. Kessler
Kessler & Solomiany, LLC
Centennial Tower
101 Marietta Street, Suite 3500
Atlanta, Georgia 30303

Pursuant to Uniform Superior Court Rule 5.2(2) with the foregoing copy of the Petitioner's Responses to Respondent's First Interrogatories and Petitioner's Responses to Respondent's Notice to Produce and Request for Production of Documents by placing a copy of same in the U.S. Mail with adequate postage affixed thereon and via e-mail.

This 16th day of July, 2014.

THE LAW OFFICE OF
TANYA MITCHELL GRAHAM, P.C.

TANYA MITCHELL GRAHAM
Georgia Bar No. 513595

4002 Highway 78, Suite 530-233
Snellville, Georgia 30039
770.469.0802 telephone
770.469.9868 facsimile
tmgesq@tanyamitchellgrahampc.com

MAYOUE GRAY EITREIM, P.C.

By:

JOHN C. MAYOUE
Georgia Bar No. 479737
Attorneys for Petitioner

5229 Roswell Road
Atlanta, Georgia 30342
(404) 809-2600 telephone
(404) 809-2601 facsimile
jmayoue@mgefamilylaw.com

theJasmineBRAND.com

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

FILED IN OFFICE
JUL 23 2014
[Signature]
DEPUTY CLERK SUPERIOR COURT
FULTON COUNTY, GA

C. B. BRIDGES, :
Petitioner, :
v. : CIVIL ACTION FILE
TAMIKA FULLER, : NO.: 2013CV240141
Respondent. :

VERIFICATION

STATE OF GEORGIA

COUNTY OF FULTON

PERSONALLY appeared before the undersigned attesting officer authorized by law to administer oaths, C. B. Bridges, affiant, who upon being duly sworn, on oath deposes and says that the facts contained in the foregoing Petitioner's Responses to Respondent's First Interrogatories and Petitioner's Responses to Respondent's Notice to Produce and Request for Production of Documents are true and correct to the best of his knowledge.

THIS, the 16th day of July, 2014.

[Signature]
C. B. Bridges
AFFIANT

Sworn to and subscribed
before me this 16th
day of July, 2014.

[Signature]
Notary Public
My Commission Expires 1/1/2016

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

JUL 23 2014
DEPUTY CLERK OF COURT
FULTON COUNTY, GA

C.B. BRIDGES)

vs.)

TAMIKA FULLER)

CASE NO. 2013-CV-240141

**BRIEF IN SUPPORT OF MOTION TO QUASH
SUBPOENA FOR THE PRODUCTION OF EVIDENCE**

The Department objects to the subpoena requiring the DeKalb County Department of Family and Children Services to produce confidential material. Federal law mandates that states require records concerning child abuse and neglect be maintained as confidential. 42 U.S.C. § 5106a(B)(4); 45 C.F.R. § 1340(i)(2)(i-xi). In furtherance of this federal requirement, each and every record of the Georgia Department of Human Services and its various Departments of Family and Children Services, including DeKalb County, regarding child abuse and neglect is declared confidential by O.C.G.A. § 49-5-40. This includes testimony or discovery from the record, whether orally or in writing.

O.C.G.A. § 49-5-41(a) provides the statutory exceptions to O.C.G.A. § 49-5-40. O.C.G.A. § 49-5-41(a)(2), the sole exception applicable to the instant situation, allows "reasonable access" to "a court, by subpoena, upon its finding that access to such records may be necessary for determination of an issue before such court. . ." The Court, however, is to examine the records in camera and is only to allow public disclosure of the records or information therein where that is "necessary for the resolution of an issue then before [the Court] and the record is otherwise admissible under the rules of evidence. . ." Id. See also Davidson v. State, 183 Ga. App. 557, 559 (1987). Similarly, where testimony regarding events contained in the Department of Family and Children Services' files is sought, the appropriate action for the court is to conduct an in camera interview with the potential witness to determine if his or her testimony is necessary for the resolution of an issue before the Court and otherwise admissible under the rules of evidence.

The Georgia General Assembly's clear intent in enacting these provisions was to interpret O.C.G.A. § 49-5-40 broadly in order to provide maximum protection to records and reports of child abuse and to interpret O.C.G.A. §§ 49-5-41 and 49-5-41.1 strictly in order to limit the scope of statutory exceptions to confidentiality. Home v. State, 192 Ga. App. 528, 531 (1989). As a result of

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this intent, O.C.G.A. § 49-5-41 takes precedence over ordinary discovery procedures. Id. Confidential records of child abuse or neglect and testimony concerning information contained in records must be absolutely "necessary for the resolution" of an issue then before the court in order for them to be released publicly. O.C.G.A. § 49-5-41(a)(2) (emphasis supplied). In order for access to be necessary, the information in the records and testimony sought must be material, Davidson v. State, supra, at 559, which depends on whether the information would affect the trial's outcome. Barnes v. State, 157 Ga. App. 582, 587 (1981). The "mere possibility" that the information might help the defense or affect the outcome of the trial does not establish materiality in the constitutional sense. Boyce v. State, 184 Ga. App. 578 (1987). The Department respectfully urges the court, therefore, not to release the requested information unless the requesting party can demonstrate that it would be necessary and material and would affect the outcome of the trial. The court also must determine whether the subpoenaed records are "otherwise admissible under the rules of evidence." O.C.G.A. § 49-5-41(a)(2). Until the court makes such a determination, the Department is precluded from releasing any such records, which may be in its possession.

In order for the Court to disclose any information to the requesting party, that information must not only be deemed by the Court necessary, but also must be admissible evidence. Many of the documents in the Department's files contain information given by third parties and, therefore, would be hearsay. The party who served the subpoena has failed to allege any hearsay exception that would apply, and thus has failed to make the necessary showing that the information sought is otherwise admissible in evidence. In addition, the Department's records may contain information from a psychologist or psychiatrist of which multiple privileges extend, O.C.G.A. §§ 24-9-21, 40, 41, 42 and 43. The party who served the subpoena has failed to allege any exception to said privileges that would apply, and thus has failed to make the necessary showing that the information sought is otherwise admissible into evidence. Accordingly, as O.C.G.A. § 49-5-41(a)(2) must be strictly construed and the party who served the subpoena has failed to show how the information sought is necessary and admissible, the motion should be denied.

Furthermore, pursuant to O.C.G.A. § 49-4-14, information regarding public assistance is deemed confidential under federal and state law and cannot be released except in accordance with applicable regulations. To participate in the AFDC program, the State of Georgia must establish regulations regarding the safeguarding of information. 42 U.S.C. § 602(A)(9). In order to qualify for federal funding, the state must include the requirements for safeguarding information in 45 C.F.R. § 205.50(a)(2). This regulation provides in pertinent part that the state agency administering AFDC must develop guidelines, which provide that:

In the event of the issuance of a subpoena for the case record or for any agency representative to testify concerning an applicant or recipient, the court's attention . . . (must be) called, through proper channels to the statutory provisions and the policies or rules and regulations against disclosure of information.
42 C.F.R. § 205.50(a)(2)(iv).

The Georgia Public Assistance Act of 1965 authorized the Commissioner of Human Services to establish necessary rules and regulations governing the custody, use and preservation of information relating to public assistance. O.C.G.A. § 49-4-14. The statute provides that "such regulation shall provide safeguards restricting the use or disclosure of information concerning applicants for or recipients of public assistance to purposes directly connected with the administration of public assistance." O.C.G.A. § 49-4-14(a). In compliance with federal regulations and the statute, the Georgia regulations regarding safeguarding of information provide that "information relating to individual AFDC applicants and recipients shall be kept strictly confidential and used solely for purposes related to the administration of the AFDC program . . ." Assistance Payments Manual, § VII-165. The Manual further provides that case records shall be safeguarded to guard against disclosure of the information and:

[t]he same policies are applied to requests for information from a governmental authority, the courts, or a law enforcement official as from any other source outside the program area as described above. If a county director is subpoenaed by a court to turn over a case record, the county director must clear with the court as to the use to be made of the records, explaining the department's policy regarding the confidential nature of the case material.

To release such records contrary to state and federal regulations could subject the state to a loss of funds under the AFDC Program.

Food Stamp recipients are also entitled to safeguarding of information regarding their application pursuant to both federal and state law. As part of its participation in the food stamp program, the State must provide in its State Plan for confidentiality of records. 7 U.S.C. § 2020(e)(8).

This subpoena is overbroad, unreasonable and oppressive as the subpoena asks for, and does not limit the search in any way. See Washburn v. Sardi's Restaurant, et al., 191 Ga. App. 307, 381 S.E. 2nd 750 (1989) and O.C.G.A. § 24-10-22(b)(1).

Without some indication of what issues are before the court, the party who has been requested to produce documents cannot determine what, if any, relevance such documents could have to such issues. It is required that such information be relevant. See Horton v. Huie, Commissioner, 113 Ga. App. 166, S.E. 2d 669 (1966).

The Georgia courts have been sensitive to the needs of individuals who have supplied information for public purposes and have recognized the proposition that an individual's right to privacy should be accommodated in the discovery process. See Borenstein v. Blumefeld, 151 Ga. App. 420 (1979). Having appraised the court of the confidentiality regulations governing the public assistance program in questions, the Department will turn over such records upon order of the court directing the Department to release such records. Additionally, if so directed by the Court, the Department will submit a copy of the unredacted version and redacted version of the records under seal for the Court's consideration and subsequent use at trial.

Accordingly, O.C.G.A. § 49-5-41(a)(2) alone controls whether the testimony sought by the party who served the subpoena should be allowed. Pursuant to O.C.G.A. § 49-5-41(a)(2), The party who served the Motion for Subpoena has failed to show how the records sought is necessary to determine an issue before the Court, and has further failed to show how the information sought would be otherwise admissible. Therefore, the Request for Records should be quashed.

SAMUEL S. OLENS
Attorney General
Georgia Bar Number 551540

DENNIS R. DUNN
Deputy Attorney General
Georgia Bar Number 234098

SHALEN S. NELSON
Senior Assistant Attorney General
Georgia Bar Number 636575

PENNY HANNAH
Assistant Attorney General
Georgia Bar Number 623563



Eleasah Hammond for
JERRY W. THACKER
Special Assistant Attorney General
Georgia Bar Number 703032

PO Box 83480
Conyers, Georgia 30013
(770) 761-8956

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

C.B. BRIDGES

vs.

TAMIKA FULLER

)
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)
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)

CASE NO. 2013-CV-240141

ORDER GRANTING MOTION TO QUASH

The Special Assistant Attorney General for the Georgia Department of Human Services, acting through the DeKalb County Department of Family and Children Services, having filed the within and foregoing Motion to Quash and Brief in Support thereof, and the Court having considered the authority cited in Movant's brief, the Court finds as a matter of law and as a matter of fact that the procedural requirements for the release of records of the DeKalb County Department of Family and Children Services as set forth in Davidson v. The State, 183 Ga. App. 557, at 559 and O.C.G.A. §§ 49-5-40 and 49-5-41 were not followed.

Therefore, it is CONSIDERED, ORDERED AND ADJUDGED that Georgia Department of Human Services, acting through the DeKalb County Department of Family and Children Services' Motion to Quash Witness Subpoena for Production of Evidence is hereby granted.

This _____ day of _____, 2014.

Judge, Superior Court
Fulton County, Georgia

Presented by:
Jerry W. Thacker
Special Assistant Attorney General
DeKalb County Department of Family and Children Services
Georgia State Bar No. 703032

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

C.B. BRIDGES

vs.

TAMIKA FULLER

)
)
)
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)
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CASE NO. 2013-CV-24014

ORDER FOR IN-CAMERA INSPECTION

Attorney for the Defendant, having served a subpoena upon the DeKalb County Department of Family and Children Services, Georgia Department of Human Services, and the Department having filed a Motion to Quash Subpoena in response, IT IS HEREBY CONSIDERED, ORDERED AND ADJUDGED as follows:

The Court, having determined that the Georgia Department of Human Services, by and acting through the DeKalb County Department of Family and Children Services has certain information, which may be relevant and admissible in the above-styled action, finds that it is necessary to conduct an in-camera inspection of the Department's records with regards to:

It is further ORDERED that if the documents are released to the parties, the parties are directed not to disclose the records to any other person or agency. All motions or pleadings, which contain information released by the Court, shall be filed under seal to maintain confidentiality. Upon conclusion of the case, the parties or their attorneys shall return all copies of the records to the DeKalb County Department of Family and Children Services and shall file a Certificate of Service stating that the records have been returned.

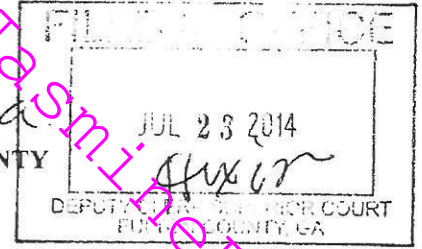
SO ORDERED this ____ day of _____, 2014.

Judge, Superior Court
Fulton County, Georgia

Presented by:
Jerry W. Thacker
Special Assistant Attorney General
Georgia State Bar No. 703032

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA



C.B. BRIDGES)
)
)
vs.)
)
TAMIKA FULLER)
)

CASE NO. 2013-CV-24014

MOTION TO QUASH REQUEST FOR THE PRODUCTION OF EVIDENCE

COMES NOW, the Georgia Department of Human Services, acting through the DeKalb County Department of Family and Children Services (hereinafter referred to "Movant") and files its Motion to Quash the issuance of a Request for the Production of Evidence issued in the above-styled case and shows the Court the following:

-1-

A Request for the Production of Documents to a Third Party (DeKalb County Division of Family and Children Services) was served by Tanya Mitchell Graham, Esquire on behalf of Petitioner, C.B. Bridges, upon the DeKalb County Department of Family and Children Services, Decatur, Georgia on or about June 30, 2014 to produce records pertaining to Tamika Fuller.

-2-

The Request directed to the DeKalb County Department of Family and Children Services and requests the following documents regarding your client, Respondent, TAMIKA FULLER, Date of Birth: September 11, 1975; Social Security Number: XXX-XX-7003:

- a. Copies of any and all applications and renewals for individual and/or family Medicaid and/or food stamps for your client, the Respondent, TAMIKA FULLER, from January 1, 2010 through and including the date for your response to this Request.
- b. Copies of any and all correspondence between DeKalb Co. DFCS and your client, the Respondent, TAMIKA FULLER, from January 1, 2010, through and including the date of your response to this Notice and Request, if any.
- c. Copies of any and all documents which show any and all individual and/or family benefits provided to your client, the Respondent, TAMIKA FULLER, from January 1, 2010, through and including the date of your response to this Notice and Request, if any.
- d. Copies of any and all documents which show and all benefits provided to your client, the Respondent, TAMIKA FULLER, and any dependent minor child of the Respondent, from

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January 1, 2010, through and including the date of your response to this Notice and Request, if any.

- e. Copies of any and all documents regarding any of the following AU Numbers: 906092017, 313055808, 134485118, 234485118, and any AU Number associated or affiliated with your client, the Respondent, TAMIKA FULLER, and any dependent minor child of the Respondent, from January 1, 2010, through and including the date of your response to this Notice and Request, if any,

-3-

Said Subpoena is unreasonable, over-broad and oppressive.

-4-

Said Subpoena requires the production of confidential and protected material from Movant's files.

-5-

Said Subpoena failed to serve the proper custodian of the documents.

-6-

If the Movant is required to produce any of the records requested in the subpoena, Movant requests that the Court first make an in-camera inspection of such records and delete from such records that material which is confidential or, not reasonably related to the above-styled case or any issue therein.


WHEREFORE, Movant requests that the Subpoena be denied or quashed and that Movant be released from any requirement to produce such records or to appear as a witness in this case.

SAMUEL S. OLENS
Attorney General
Georgia Bar Number 551540

DENNIS R. DUNN
Deputy Attorney General
Georgia Bar Number 234098

SHALEN S. NELSON
Senior Assistant Attorney General
Georgia Bar Number 636575

PENNY HANNAH
Assistant Attorney General
Georgia Bar Number 323563


Eleasah Hammond for

JERRY W. THACKER
Special Assistant Attorney General
Georgia Bar Number 703032

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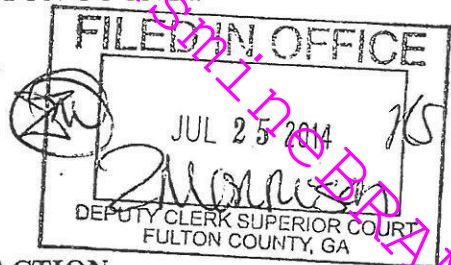
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IN THE SUPERIOR COURT OF FULTON COUNTY
FAMILY DIVISION
STATE OF GEORGIA



C.B. BEIDGES

Petitioner,

and

TAMIA FULLER

Respondent.

CIVIL ACTION
FILE NO. 2019 CV 70141

JUDGE WENDY L. SHOOB

TRIAL NOTICE

Parties in the above-styled case are hereby scheduled for a three-week trial calendar beginning OCTOBER 27, 2014 at 9:00 a.m. in Courtroom 7E, 185 Central Avenue, Atlanta, Georgia 30303.

If your case has not been specially set or placed on call, Counsel and parties must appear for the calendar call. Failure to appear for the call of calendar may result in the dismissal of your case or entry of a judgment against you. Parties, and counsel, if applicable, are responsible for notifying the Guardian Ad Litem of the trial time.

All parties, and counsel, if applicable, are required to complete the attached questionnaire. The questionnaire should be returned to the Staff Attorney by email or regular mail.

If a jury trial is demanded by either party, a Consolidated Pre-Trial Order, motions, *voir dire* questions, and proposed jury charges are due a week prior to trial.

An announcement of settlement is not sufficient to remove a case from the calendar. Cases will remain on the calendar until a dismissal or final order is entered.

The calendar will be published in the Fulton County Daily Report at least twenty days in advance of the calendar date. The Court may call cases out of order.

Counsel with conflicts must stay in contact with opposing counsel and the court's Staff Attorney. Continuances will be granted for legal excuses only and a timely conflict letter in full compliance with Rule 17.1 is required.

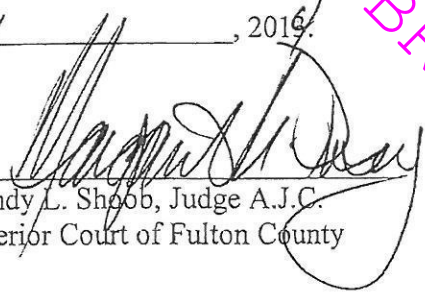
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Counsel are responsible for sending this Notice to opposing parties who are proceeding pro se or to opposing counsel who do not appear on this notice.

Trial inquiries should be directed to the Staff Attorney, Carole Powell, at (404) 612-6044 or carole.powell@fultoncountygga.gov.

SO ORDERED, this 22 day of July, 2016.


Wendy L. Shoob, Judge A.J.C.
Superior Court of Fulton County

Distribution list:

Randy Kessler R KESSLER@KS FAMILY LAW.COM
Thad Woody T WOODY@KS FAMILY LAW.COM
Kyla Lines Kyle@prfamilylaw.com
John Mayore J Mayore@MSE FAMILY LAW.COM
Tanya Mitchell Graham Tmg95@gmail.com

IN THE SUPERIOR COURT OF FULTON COUNTY
FAMILY DIVISION
STATE OF GEORGIA

A. B. BRIDGES,)
)
Petitioner,)
)
and)
TANIKA FULLER,)
)
Respondent.)
)

CIVIL ACTION
FILE NO. 2013 CU290141

JUDGE WENDY L. SHOOB

QUESTIONNAIRE

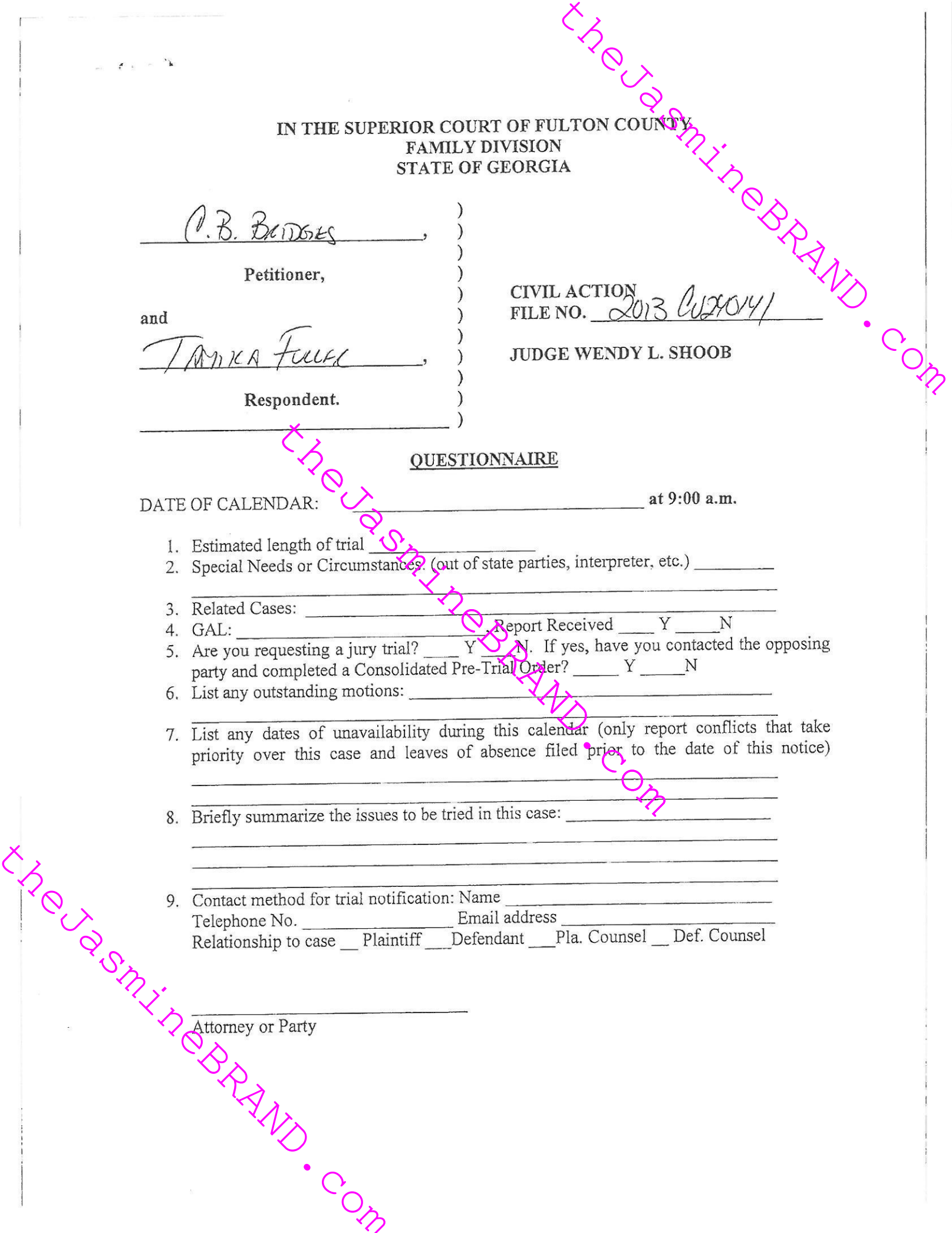
DATE OF CALENDAR: _____ at 9:00 a.m.

1. Estimated length of trial _____
2. Special Needs or Circumstances. (out of state parties, interpreter, etc.) _____
3. Related Cases: _____
4. GAL: _____ Report Received ___ Y ___ N
5. Are you requesting a jury trial? ___ Y ___ N. If yes, have you contacted the opposing party and completed a Consolidated Pre-Trial Order? ___ Y ___ N
6. List any outstanding motions: _____
7. List any dates of unavailability during this calendar (only report conflicts that take priority over this case and leaves of absence filed prior to the date of this notice)

8. Briefly summarize the issues to be tried in this case: _____

9. Contact method for trial notification: Name _____
Telephone No. _____ Email address _____
Relationship to case ___ Plaintiff ___ Defendant ___ Pla. Counsel ___ Def. Counsel

Attorney or Party

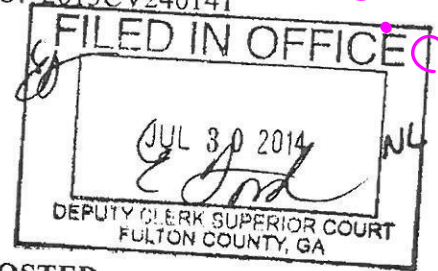


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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA

C.B. Bridges,
Petitioner,
v.
Tamika Fuller,
Respondent.

CASE NO. 2013CV240141



**ORDER TO ATTEND JUDICIALLY HOSTED
SETTLEMENT CONFERENCE**

The above styled case has been scheduled for a Judicially Hosted Settlement Conference with Senior Judge Melvin K. Westmoreland on
October 7, 2014 at 10:00 A.M.

The conference will be held in Senior Judge Westmoreland's chambers at 136 Pryor St., Suite C-848, Lewis Slaton Courthouse.

The conference will last for no more than one day. All participants must make themselves available for the entire day. All counsel and all parties must be present in person at the conference and must be vested with full settlement authority. Notwithstanding any other court order, if an insurance company is involved in the case, then the adjuster must also BE PRESENT in person at the conference.

There is a non-refundable fee of **\$400.00 per party** for this service. Payment must be made immediately upon receipt of this order and must be received by the ADR office within **5 days** of the date of this order. If the conference is cancelled by either party, for ANY reason (including withdrawal of an attorney), all parties are still required to pay their share of the fee. If a conference is later rescheduled for another date, each party will be required to pay another \$400.00 fee.

Failure to make payment may result in sanctions, including contempt of court.

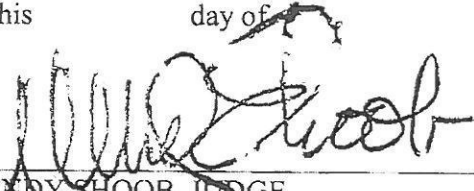
Payments may be made by check drawn on an attorney account or through PayPal. If payment is made by check, each attorney must mail a check (no checks from parties) made payable to the order of Fulton County ADR Board in the appropriate

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amount to 160 Pryor Street, Suite JG26, Atlanta, GA 30303. The face of the check should include the civil file action number and which party (plaintiff or defendant) is submitting the payment. If attorneys or parties choose to pay through PayPal, the portal for PayPal can be accessed through the ADR page of the Fulton County Superior Court website.

If an agreement is reached at the conference, the court reporter will charge a fee of \$20.00 per party to place the agreement on the record. Please come prepared to pay this fee at the end of the settlement conference.

SO ORDERED, this _____ day of _____, 2014.



WENDY SHOOB, JUDGE
SUPERIOR COURT OF FULTON CO., A.J.C.

cc:

Petitioner's Attorney

Tanya Mitchell Graham, Esq.
Tanya Mitchell Graham, PC
4002 Highway 78, Suite 530-233
Snellville, GA 30039
770-469-0802
Fax: 770-469-9868
tmgesq@gmail.com

John C. Mayoue, Esq.
Mayoue Gray Eitrem, PC
5229 Roswell Road
Atlanta, GA 30342
404-809-2600
Fax: 404-809-2601
jmayoue@mgefamilylaw.com

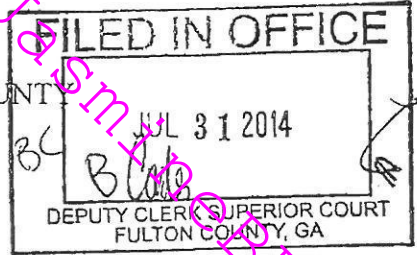
Respondent's Attorney

Randall M. Kessler, Esq.
Kessler & Solomiany LLC
Centennial Tower
101 Marietta Street
Suite 3500
404.688.8810
404.681.2205 (fax)
Atlanta, Georgia 30303
rkessler@ksfamilylaw.com

ADR:

Jerry Wood
Fulton County ADR Office
160 Pryor Street, Suite JG26,
Atlanta, GA 30303
(404) 612-4549
Jerry.wood@fultoncountygga.gov

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IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

C.B. BRIDGES,)
)
Petitioner,)
v.)
)
TAMIKA FULLER,)
)
Respondent.)

CIVIL ACTION NO. 2013CV240141

RULE 5.2 CERTIFICATE OF SERVICE OF DISCOVERY

COMES NOW, C.B. BRIDGES, Petitioner in the above-captioned action and, pursuant to Superior Court Uniform Rule 5.2, certifies that the **Notice of Taking Deposition of Respondent** was served upon counsel for Respondent via electronic mail and U.S. Mail with adequate postage affixed thereon and addressed to:

Randall M. Kessler, Esq.,
Kessler & Solomiany, LLC
101 Marietta St., Suite 3500
Atlanta, GA 30303

This 29th day of July, 2014

THE LAW OFFICE OF
TANYA MITCHELL GRAHAM, P.C.

Tanya Mitchell Graham (w/exp perm. MPH)
TANYA MITCHELL GRAHAM
Georgia Bar No. 513595
Attorneys for Petitioner

4002 Highway 78, Suite 530-233
Snellville, Georgia 30039
770.469.0802 telephone
770.469.9868 facsimile
tmgcsq@tanvamitchellgrahampc.com

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C.B. Bridges v. Tamika Fuller
Superior Court of Fulton County
Civil Action File No. 2013CV240141
Rule 5.2 Certificate of Service of Discovery

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FILED IN OFFICE
JUL 31 2014
DEPUTY CLERK SUPERIOR COURT
FULTON COUNTY, GA

IN THE SUPERIOR COURT OF FULTON COUNTY
STATE OF GEORGIA
FAMILY DIVISION

C. B. BRIDGES, :
Petitioner, : CIVIL ACTION
v. : FILE NO.: 2013CV240141
TAMIKA FULLER, :
Respondent. :

RESPONSE AFFIDAVIT OF NON-PARTY

FROM: PILLAR HOTELS AND RESORTS, L.P.

COMES NOW, Gus J. Schmidt and responds to Respondent's Request for Production of Documents as follows:

Please indicate the appropriate response below:

- Copies of the requested materials have been attached.
- The materials requested will be produced at the designated address.
- The materials requested do not exist.

AFFIDAVIT

Personally came before me, the undersigned officer, duly authorized to administer oaths; _____ who, upon being duly sworn, states the following:

1.

(S)he is the custodian of the attached records.

2.

The attached records were made at or near the time of the occurrence of the matters set forth by, or from information transmitted by, a person with knowledge of those matters.

3.

The attached records were kept in the course of the regularly conducted activity.

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4.

The attached records were made by the regularly conducted activity as a regular practice

5.

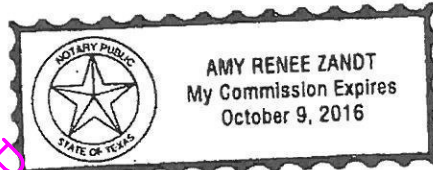
That the copies attached hereto are true and correct and that there are _____ pages that have been attached and constitute the entire file materials requested.

This 21st day of July, 2014.



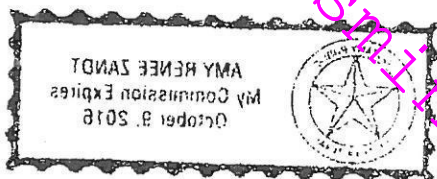
Sworn to and subscribed before me this 21 day of July, 2014.

Amy Renee Zandt
Notary Public
My commission expires: 10/9/2016



(SEAL)

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