**IN THE IOWA DISTRICT COURT FOR POLK COUNTY**

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| IN RE THE MARRIAGE OF JOHN DOE AND JANE DOE | |
| Upon the Petition of  JOHN DOE,  Petitioner,  And Concerning,  JANE DOE,  Respondent. | CASE NO. \*\*\*\*\*\*\*\*  **MOTION TO QUASH** |

COMES NOW Mark R. Hinshaw, attorney for Jane Doe and for her Motion to Quash Subpoenas and in support states:

1. On or about the 26th of January, 2017 Jane Doe was served with a subpoena duces tecum, (see attached Subpoena to Smith).
2. The subpoena submits Jane Doe to an undue burden and expense.
3. On or about the 31st of February, 2017 American State Bank was served with a subpoena duces tecum, (see attached Subpoena to American State Bank).
4. The subpoena requests Jane Doe’s account information.
5. Jane Doe did not receive a notice of intent to subpoena her information from this bank per Iowa Rule of Civil Procedure 1.1701(3)(a).
6. On or about the 2nd of February, 2017 Great Western Bank, Corydon State Bank, and Farm Credit Services of America was served with a subpoena duces tecum, (see attached Subpoena to banks).
7. The subpoena requests Jane Doe’s account information.
8. Jane Doe did not receive a notice of intent to subpoena her information from these banks per Iowa Rule of Civil Procedure 1.1701(3)(a).
9. Jane Doe is not a party to this action; nor will these documents likely lead to the discovery of admissible evidence for this action.
10. On the 2nd of February, 2017 Mark R. Hinshaw emailed Attorney for Respondent regarding the undue burden and expense this subpoena to Jane Doe and requested the relevancy of said documents pertaining to this action.

WHEREFORE, Jane Doe, by and through her attorney, Mark R. Hinshaw, requests the Court to quash the subpoenas served upon her and her financial institutes by Attorney for Respondent and for any other relief the Court deems just and necessary.

Respectfully submitted,

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# Mark R. Hinshaw AT0009119

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