

This document contains sensitive information.

NO. 1-26-0756

IN RE:
Bryan McNeal, and Dennis London,
Petitioners

REQUESTING 202 PRESUIT
DISCOVERY RE: JANE/JOHN DOES

IN THE ROCKWALL DISTRICT

Rockwall County - 439th District Court

COURT NO. _____

ROCKWALL COUNTY, TEXAS

PETITION REQUESTING DISCOVERY/DEPOSITION BEFORE SUIT

Petitioners Bryan McNeal and Dennis London, file this Petition for Pre-Suit Discovery pursuant to Texas Rule of Civil Procedure 202 and respectfully show the Court as follows:

I. DISCOVERY SOUGHT PER TEX. R. CIV. P. 202.

Petitioners seek pre-suit discovery from Meta Platforms, Inc. ("Meta") to obtain the identity and contact information of anonymous users who posted defamatory and harassing statements about Petitioners on the Facebook group "Rockwall EXPOSED!" Specifically, Petitioners request:

The name, email address, telephone number, IP address, and any other identifying information associated with the anonymous accounts/publishers identified in the attached Exhibit 1-4 (Bates-labeled screenshots from the group). Additional specific and identifying information that is sought regarding these publishers, that Petitioners seek to investigate, is further identified below. Petitioners request this discovery and would show that it is necessary so: i) they may send formal defamation retraction demands in compliance with Texas Civil

Practice & Remedies Code § 73.055 and; ii) if necessary, investigate the propriety for filing suit on the claims enumerated below.

II. PETITIONERS CAN SHOW STRONG FACTS TO SUPPORT THIS REQUEST.

Petitioners are private individuals who have been the target of a sustained campaign of false, defamatory, and harassing posts on the public Facebook group “Rockwall EXPOSED!”. The anonymous posters or publishers have repeatedly accused Petitioners (and their family members) of corruption, lying to the public, financial misconduct, and other serious misconduct. Certain posts go further and sexually humiliate family members by suggesting they would work as strippers or engage in sex work (see Bates No. documents attached in the exhibits supporting this application and request for relief).

Many of these statements are false, inflammatory, go beyond the bounds of community rules for communications on the Meta platform, as well as beyond the publishers’ fundamental right to speech; moreover, the publishers’ statements have caused Petitioners substantial harm to their reputations, personal and professional businesses, and personal well-being.

III. PETITIONERS SATISFY THE RULE 202 REQUIREMENTS.

Under Texas Rule of Civil Procedure 202, a person may petition the court for an order authorizing discovery before a lawsuit is filed “to investigate a potential claim or suit” or “to preserve evidence.” Tex. R. Civ. P. 202.1.

1. Petitioners reasonably anticipate sending a retraction demand letter, to the identified publishers, in compliance with Texas Civil Practice & Remedies Code § 73.055 as well as investigation of, and potential filing of claims that may include and not be limited to

defamation, defamation per se, and cyberbullying under, Tex. Civ. Prac. & Rem. Code § 129A.002, which allows for injunctive relief to prevent further cyberbullying as well as possibly seeking relief under a claim for intentional infliction of emotional distress against the anonymous publishers.

2. Without the identifying information from Meta, Petitioners cannot send retraction demands or properly conduct additional discovery, or name and serve any potentially responsible party/parties.

3. The requested discovery is narrowly tailored to only the information necessary to identify the publishers.

IV. REQUEST FOR DISCOVERY FROM META PLATFORMS, INC. UNDER UIDDA AND LETTERS ROGATORY.

Because Meta Platforms, Inc. (“Meta”) is headquartered in Menlo Park, California, and does not voluntarily disclose user-identifying information without a court order, Petitioners request that this Court authorize discovery from Meta through the following alternative methods:

A. Pursuant to the Uniform Interstate Depositions and Discovery Act Petitioners also seek leave of the Court to issue an order that may be domesticated in the Superior Court of California, County of Santa Clara, for enforcement of the attached Subpoena Duces Tecum; and

B. In the alternative, and to ensure full compliance, Petitioners request that the Court issue Letters Rogatory directed to appropriate jurisdiction of the Superior Court of California,

County of Santa Clara, requesting judicial assistance in enforcing the attached Subpoena Duces Tecum.

A. REQUEST FOR LETTERS ROGATORY.

Because Meta Platforms, Inc. is headquartered in California and does not voluntarily disclose user information without a court order from a California court, Petitioners request that this Court issue Letters Rogatory directed to the Superior Court of California, County of Santa Clara, requesting that court to enforce a subpoena duces tecum on Meta for the identifying information described above.

i. Requested Discovery.

Petitioners identify the following discovery from Meta regarding the anonymous publishers herein identified by their “handle” or online identification name, and collectively called the Jane/John Does that Petitioner seeks to identify to publish retraction demand notices under the Tex. Civ. Prac. & Rem. Code, and to investigate these claims. Petitioners further disclose the following information regarding the anonymous Meta community members regarding their comments included in **Exhibit 1: 2026 4 10 More Texts .pdf** (Bates 000001–000003) and are further identified as follows:

Regarding Jane/John Doe No. 1: You_lost_Adrienne_Balkum_”

Regarding Jane/John Doe No. 2: “ScenicCrocodile7672”

Regarding Jane/John Doe No. 3: “Anonymous participant 402”

A summary of these improper, inflammatory, abusive, harassing, defamatory posts/comments, and publications is attached as **Exhibit 1**, which state:

“Where should we sign if we want a strip club in Rockwall? Asking for a friend.” *Anonymous participant 402*

“I’m sure his daughter would be working there.” (referring to McNeal’s daughter) *ScenicCrocodile7672*

“Is she good looking? Assets worth the expenditure. Again, asking for a friend.” *Anonymous participant 402*

“his daughter can switch from only fans to pole dancer”
ScenicCrocodile7672

The aforementioned John/Jane Doe publishers (users identified by the name “You_lost_Adrienne_Balkum_” and “ScenicCrocodile7672” exchanged potentially abusive banter however, it is on Bates Numbered pages 002 that “Anonymous participant 402” and “ScenicCrocodile7672” cross the line cross the line, stating as follows:

“Where should we sign if we want a strip club in Rockwall? Asking for a friend.” *Anonymous participant 402*

“I’m sure his daughter would be working there.” (referring to McNeal’s daughter) *ScenicCrocodile7672*

“Is she good looking? Assets worth the expenditure. Again, asking for a friend.” *Anonymous participant 402*

“his daughter can switch from only fans to pole dancer”
ScenicCrocodile7672

Based on the facts as we understand them this content in the “Rockwall EXPOSED!” group violates Facebook’s Bullying and Harassment Community Standards due to the repeated, targeted sexual shaming and humiliation of Bryan McNeal’s daughter by publicly suggesting she would work as a stripper or pole dancer. **Exhibit 1: 2026 4 10 More Texts .pdf’ (Bates 000001–000003).**

These are direct harassing and abusive statements stating that Mr. McNeal’s “daughter would be working there,” [a strip club] and other group members responding asking whether she is “good looking?” or through innuendo trying to determine if her physical attraction is

worth spending money to see her at an exotic dance club (in the thinly veiled phrase [are her] “Assets worth the expenditure?” and then finally, stating that Mr. McNeal’s “daughter can switch from only fans to pole dancer.”

Petitioners further identify the following discovery to be included in the request to Meta regarding the anonymous publishers herein identified by their “handle” or online identification name, and collectively called the Jane/John Does that Petitioner seeks to identify to publish retraction demand notices under the Tex. Civ. Prac. & Rem. Code, and to investigate these claims. Petitioners further disclose the following information regarding the anonymous Meta community members regarding their comments are identified as follows

Exhibit 2: 2026 4 10 London, Dennis Bates 01-14:

Regarding Jane/John Doe No. 4: “Anonymous participant 105”

Regarding Jane/John Doe No. 5: “Anonymous participant 610”

Regarding Jane/John Doe No. 6: “Anonymous participant” (identified in **Exhibit 2:** Bates No. 008-009);

Regarding Jane/John Doe No. 7: “Anonymous participant 921” (identified in **Exhibit 2:** Bates No. 012);

“London and his pals Brewer and McNeal are all corrupt or completely stupid... unethical behavior... trash taken out.” *Anonymous participant 105*

Exhibit 2: Bates No. 005

“London, Brewer, and McNeal’s friend’s pockets... tax-grabbing looters...”

Anonymous participant 610

Exhibit 2: Bates No. 006

Dennis Chip London was so proud to post the name... falsely served with a search warrant. The entire group of people are such lowlifes. They do some evil things..." *Anonymous participant*

Exhibit 2: Bates No. 008-009

Alleging Dennis London (and his wife, i.e., "the Londons") are in "collusion" with Bob Hall, another elected official

Anonymous participant 921

Exhibit 2: Bates No. 0012

Based on the facts as we understand them this content in the "Rockwall EXPOSED!" group violates Facebook's Bullying and Harassment Community Standards due to the repeated, targeted/coordinated innuendo and very public accusation of corruption, collusion, abuse of official authority (falsely serving or disclosing the serving, of a "false search warrant"), not to mention the constant degradation of then private individuals or, even if public individuals, commentary crossing into targeted personal attacks, as they are allegations of corruption, abuse, coordinated harassment, and shaming. These are not acceptable community communications under Meta's codes of conduct, and these are not examples of protected political speech (and even if it were, the speech is questionable).

Petitioners further identify the following discovery to be included in the request to Meta regarding the anonymous publishers herein identified by their "handle" or online identification name, and collectively called the Jane/John Does that Petitioner seeks to identify to publish retraction demand notices under the Tex. Civ. Prac. & Rem. Code, and to investigate these claims. Petitioners further disclose the following information regarding the

anonymous Meta community members regarding their comments are identified as follows

Exhibit 3: 2026 4 10 London, S. Bates No. 015-39:

Regarding Jane/John Doe No. 8: “Anonymous participant” (identified in **Exhibit 3:** Bates No. 016);

Regarding Jane/John Doe No. 9: “Anonymous participant 105” (identified in **Exhibit 3:** Bates No. 017-020);

Regarding Jane/John Doe No. 10: “Anonymous participant” (identified in **Exhibit 3:** Bates No. 022);

Regarding Jane/John Doe No. 11: “Anonymous participant 921” (identified in **Exhibit 3:** Bates No. 023);

“Everyone knows what a scumbag you and your husband are... you are all f[*]cking corrupt individuals... mooching off city taxpayers.”

Anonymous participant

Exhibit 3: Bates No. 016

“London and his pals Brewer and McNeal are all corrupt... master manipulators, narcissists, and great at lying to the public... using taxpayers’ money like a personal bank account.”

Anonymous participant 105

Exhibit 3: Bates No. 017-020

“All four of them are **tax-grabbing looters** who are using their positions to favor themselves and their friends. **F[*]cking bastards.**”

Anonymous participant 610

Exhibit 3: Bates No. 022

“This picture makes him appear way less corrupt than he is. He’s shit and he should have been prosecuted... London seemed like the prime suspect, taking that money and using it for personal gain.”

Anonymous participant 486

Exhibit 3: Bates No. 023

The pattern shows repeated, targeted harassment (Facebook Bullying & Harassment violation) and statements of fact accusing corruption, personal financial misconduct, and criminality (Texas defamation risk). Anonymous participant 949 also “piles on” the abuse in violation of

Meta community communication standards, with statements directed to the Londons like: “[y]ou have a history of being a vile, rumor spreading b[*]tch... all f[*]cking lying scum,” including insulting images/memes and more accusations that [the Londons] have been “running a hate page for years,” and that they’re “clearly” liars, that the “b[*]tch bites, bite her back,” clearly encouraging “piling on” -or the improper collective, mounting, abusive commentary, etc. **Exhibit 3: Bates No. 026, 027, 031.**

Based on the facts as we understand them this content in the “Rockwall EXPOSED!” group violates Facebook’s Bullying and Harassment Community Standards, again, due to: i) repeated, targeted/coordinated innuendo; ii) very public accusations of corruption, collusion, abuse of official authority; iii) a pattern/practice of constant degradation private individuals or, even if a public individual, commentary crossing into targeted personal attack. These are not just mere allegations of corruption, it is more coordinated harassment, and abuse. Meta’s community standards conduct requires more and these posts are not within the bounds of the published Meta community codes of conduct; additionally, these are not examples of protected political speech (and even if it were, the speech is questionable).

Petitioners finally identify the following discovery to be included in the request to Meta regarding the anonymous publishers herein identified by their “handle” or online identification name, and collectively called the Jane/John Does that Petitioner seeks to identify to publish retraction demand notices under the Tex. Civ. Prac. & Rem. Code, and to investigate these claims. Petitioners further disclose the following information regarding the anonymous Meta

community members regarding their comments are identified as follows **Exhibit 4: 2026 4 10**

Harassing Post/Info. Bates No. 164:

Regarding Jane/John Doe No. 12: “Anonymous participant” (identified in Exhibit 4: Bates No. 164);

This comment makes a statement of fact that that McNeal and his “cronies,” are or have been “using taxpayers as personal bank accounts”; and re-shares a previous post, accusing McNeal (and apparently, the Londons) of being “malicious,” a “mouthpiece for evil,” making a statement of fact that they engaged in “larceny,” or other public corruption to “bail out their HOA.”

Anonymous participant

Exhibit 4: Bates No. 164

The pattern shows repeated, targeted harassment (Facebook Bullying & Harassment violation) and statements of fact accusing corruption, personal financial misconduct, and criminality (Texas defamation risk). The group promotes or tolerates anonymous participant abuses and encourages “piling on” harsh, abusive, harassing, offensive commentary, in violation of Meta community communication standards. **Exhibit 4: Bates No. 164.**

Based on the facts as we understand them this content in the “Rockwall EXPOSED!” group violates Facebook’s Bullying and Harassment Community Standards, again, due to: i) repeated, targeted/coordinated innuendo; ii) very public accusations of corruption, collusion, abuse of official authority; iii) a pattern/practice of constant degradation private individuals or, even if a public individual, commentary crossing into targeted personal attack. These are not just mere allegations of corruption, it is more coordinated harassment, and abuse. Meta’s community standards conduct requires more and these posts are not within the bounds of the

published Meta community codes of conduct; additionally, these are not examples of protected political speech (and even if it were, the speech is questionable).

ii. Proposed Deponent and Expected Testimony.

Petitioners would show that the recipients of the requested discovery are identified here:

Curtis Joseph "C.J." Mahoney, Chief Legal Officer: Meta, as well as;

Attn: Meta Legal Department/Person Most Knowledgeable/Custodian of Records
1 Meta Way
Menlo Park, California 94025

Meta's person most knowledgeable, identified above or to be identified by Meta, is anticipated to be a person expected to have percipient facts that are or may be material to Petitioners' inquiries and interests could not be ascertained through any other reasonable or diligent inquiry.

Petitioners seek to depose the person most knowledgeable/custodian of records, at Meta, simply as a provider of answers to discovery (deposition on written questions, subpoena duces tecum), from Petitioners and is expected to elicit from the witness only the following anticipated testimony: a detailed disclosure of *only* the anonymous posting members of the identified page that have targeted Petitioners with harassing, abusive, defamatory communications, etc., and other relevant information about the occurrences in question before the Court. These John/Jane Doe publishers are identified above, and their posts are contained in this document, as well as attached in their original and unaltered form in Exhibit Nos. 1-4.

Petitioners request that the Court set a date for hearing on this Petition, and after the hearing find that allowing the petitioner to take the requested deposition may prevent a failure or delay of justice in the anticipated suit. The petitioner further requests that the court issue an order authorizing the petitioner to take the deposition of Meta's person most knowledgeable, on written questions, with subpoena duces tecum and alternatively issue a subpoena under Uniform Interstate Depositions and Discovery Act.

PRAYER

Petitioners respectfully pray that the Court:

1. Grant this Petition for Pre-Suit Discovery under Texas Rule of Civil Procedure 202;
2. Issue an Order permitting the Applicants herein to seek discovery from Meta Platforms, Inc. to produce the requested identifying information;
3. Approve the issuance of Letters Rogatory to the recipient of discovery, the subpoena duces tecum, and the subpoena compelling attendance at the deposition, by Meta by and through a proper request to Meta, or alternatively, through the Superior Court of California, County of Santa Clara, in a form compliant under California and Texas law; and
4. Grant such other and further relief to which Petitioners may be entitled.

By: /s/ KC Ashmore

KC Ashmore

Texas Bar No. 24040451

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Ashmore & Ashmore

902 N. Goliad

Rockwall, Texas 75087

Tel. (972) 325.5938

Fax. (972) 349.1759

COUNSEL FOR PETITIONERS

NO. _____

IN RE:
Bryan McNeal, and Dennis London,
Petitioners

REQUESTING 202 PRESUIT
DISCOVERY RE: JANE/JOHN DOES

IN THE ROCKWALL DISTRICT

COURT NO. _____

ROCKWALL COUNTY, TEXAS

**ORDER GRANTING PETITIONERS' RELIEF, REQUESTING
DISCOVERY/DEPOSITION BEFORE SUIT**

On this _____ the Court considered the pleading of the Petitioners' and GRANTS the following relief: i) the Petition for pre-suit discovery is granted; ii) the Court ORDERS the issuance of the Letters Rogatory and accompanying Subpoena Duces Tecum/Deposition Subpoena attached, to facilitate the discovery requested herein.

Judge Presiding

NO. _____

IN RE:
Bryan McNeal, and Dennis London,
Petitioners

REQUESTING 202 PRESUIT
DISCOVERY RE: JANE/JOHN DOES

IN THE ROCKWALL DISTRICT

COURT NO. _____

ROCKWALL COUNTY, TEXAS

**MOTION FOR LETTERS ROGATORY REQUESTING
ISSUANCE OF SUBPOENA FOR THE
DEPOSITION ON WRITTEN QUESTIONS OF
META'S PERSON MOST KNOWLEDGEABLE REGARDING
THE LIMITED DISCOVERY SOUGHT BY PETITIONERS**

PETITIONERS respectfully request this Court issue a Letter Rogatory, requesting the appropriate judicial authority in the State of California, issue a subpoena for: Meta Legal Department, Person Most Knowledgeable/Custodian of Records, c/o 1 Meta Way, Menlo Park, California 94025, and produce a witness with knowledge about the facts of this limited discovery request in this case, to appear and give the oath, and then provide truthful testimony in this matter before a notary public or another judicial officer that can effectuate, and take sworn testimony under the laws of the State of California.

The Meta Legal Department's Person Most Knowledgeable witness is not and is not intended to be a party to this action, but is being served this process only as a necessary fact witness. The Meta Legal Department's Person Most Knowledgeable is a resident of the state of California. Petitioners, therefore, respectfully request this Court to issue a Letter Rogatory

to be sent to the appropriate judicial authority in the State of California, to issue the subpoena. The deposition will take place at the time and location designated in the subpoena attached and identified as “Exhibit A: Motion for Letters Rogatory,” to this pleading.

For these reasons, Petitioners respectfully request this Court grant this Motion and issue a Letter Rogatory requesting the appropriate judicial authority in the State of California to issue a deposition on written questions subpoena upon the Meta Legal Department’s Person Most Knowledgeable, directing him/her to appear and give testimony under oath in this matter

Respectfully submitted,

By: /s/ KC Ashmore

KC Ashmore

Texas Bar No. 24040451

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Rockwall, Texas 75087

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COUNSEL FOR PETITIONERS

EXHIBIT A, to Motion For Letters Rogatory

NO. _____

IN RE:
Bryan McNeal, and Dennis London,
Petitioners

REQUESTING 202 PRESUIT
DISCOVERY RE: JANE/JOHN DOES

IN THE ROCKWALL DISTRICT

COURT NO. _____

ROCKWALL COUNTY, TEXAS

**NOTICE OF DEPOSITION ON WRITTEN QUESTIONS AND SUBPOENA
DUCES TECUM TO PERSON MOST KNOWLEDGEABLE/CUSTODIAN OF
RECORDS FOR META PLATFORMS, INC. / FACEBOOK**

TO: Custodian of Records Meta Platforms, Inc. / Facebook by and through its registered agent for service in Texas or authorized corporate officer, or if domesticated in California, through a sheriff or constable or other officer/agent of the Court authorized to serve process under the Texas Rules of Civil Procedure.

You are hereby commanded to appear and answer the following location: Meta Legal Department, Person Most Knowledgeable/Custodian of Records, c/o 1 Meta Way, Menlo Park, California 94025, and answer and respond to this Deposition on Written Questions under oath, and to produce the documents described below, pursuant to Texas Rules of Civil Procedure 200 and 176.

Date and Time for Response: Within thirty (30) days after service of this Subpoena, or as otherwise ordered by the Court.

Place for Return: KC Ashmore, Petitioners' counsel, 902 N. Goliad, Rockwall, Texas 75087, c-serve@ashmorelawfirm.com, kc@ashmorelawfirm.com, 972.325.5938 (T), 972.349.1759 (F).

Limited Purpose: This discovery is sought solely for the investigation and service of process related and not limited to: defamation retraction letters as set out per Texas Civil Practice & Remedies Code § 73.055, and the investigation of claims that may involve harassing, abusive, or targeting conduct and/or defamation (including demands for retraction) arising from content posted on, and in violation of, the Meta social media platform.

1. DEFINITIONS

For the purposes of these Written Questions and the accompanying document requests, the following definitions apply:

“Publisher” means any of those identified Anonymous Publisher/Poster usernames utilized by a Meta user whether an individual or entity, identified as Jane/John Does: 1-12:

Jane/John Doe No. 1: You_lost_Adrienne_Balkum_”;

Jane/John Doe No. 2: “ScenicCrocodile7672”;

Jane/John Doe No. 3: “Anonymous participant 402”;

Jane/John Doe No. 4: “Anonymous participant 105”;

Jane/John Doe No. 5: “Anonymous participant 610”;

Jane/John Doe No. 6: “Anonymous participant” (identified in Exhibit 2: Bates No. 008-009);

Jane/John Doe No. 7: “Anonymous participant 921” (identified in Exhibit 2: Bates No. 012);

Jane/John Doe No. 8: “Anonymous participant” (identified in Exhibit 3: Bates No. 016);

Jane/John Doe No. 9: “Anonymous participant 105” (identified in Exhibit 3: Bates No. 017-020);

Jane/John Doe No. 10: “Anonymous participant” (identified in Exhibit 3: Bates No. 022);

Jane/John Doe No. 11: “Anonymous participant 921” (identified in Exhibit 3: Bates No. 023);

Jane/John Doe No. 12: “Anonymous participant” (identified in Exhibit 4: Bates No. 164);

who posted, commented, shared, uploaded, or otherwise caused any content to appear on the Meta social media platform (including but not limited to the private or public Facebook group known as “Rockwall EXPOSED!” or any related pages or threads);

“Poster” means any of those identified Anonymous Publisher/Poster usernames/users who created, authored, replied to, or contributed to any post, comment, meme, image, or other content on the Meta platform that is alleged to constitute harassing, abusive, targeting, or defamatory conduct;

“Identifying Information” means any data that could reasonably be used to identify a Publisher or Poster, including but not limited to: real name, legal name, account name, username, display name, profile URL, email address(es) associated with the account, telephone

number(s), IP address(es), device identifiers, billing or payment information, and any other subscriber or account registration data;

“Anonymous Publisher/Poster” means any identified Publisher or Poster who used a pseudonym, nickname, anonymous participant label (e.g., “Anonymous participant 105”), or any other identifier that does not clearly disclose the user’s real name;

“Offensive Content” means any post, comment, reply, meme, image, or other material alleged to violate Meta’s Community Standards or Community Use Rules, including (but not limited to) content involving bullying, harassment, name-calling, profanity-laced attacks, degradation, shaming, repeated negative targeting, or accusations of criminality, corruption, dishonesty, or unethical acts in the attached Exhibits.

2. INSTRUCTIONS

- a. Answer each question fully and completely in writing, under oath, as of the date of your response;
- b. If you cannot answer a question fully, state the reason and provide all information available to you;
- c. You may produce documents in lieu of or in addition to a written answer where the documents fully and completely respond to the question;
- d. All documents produced shall be Bates-stamped and accompanied by a verification/affidavit of the Custodian of Records.

DEPOSITION ON WRITTEN QUESTIONS

QUESTION 1: Identify all Publishers and Posters associated with the Facebook group “Rockwall EXPOSED!” as identified here (below), and also as specifically referenced in the corresponding, unaltered original posts (all attached as exhibits).

Exhibit 1: 2026 4 10 More Texts .pdf” (Bates 000001–000003) publishers identified as follows:

Regarding Jane/John Doe No. 1: You_lost_Adrienne_Balkum_”

Regarding Jane/John Doe No. 2: “ScenicCrocodile7672”

Regarding Jane/John Doe No. 3: “Anonymous participant 402”

Exhibit 2: 2026 4 10 London, Dennis Bates 01-14: publishers identified as follows:

Regarding Jane/John Doe No. 4: “Anonymous participant 105”

Regarding Jane/John Doe No. 5: “Anonymous participant 610”

Regarding Jane/John Doe No. 6: “Anonymous participant” (identified in Exhibit 2: Bates No. 008-009);

Regarding Jane/John Doe No. 7: “Anonymous participant 921” (identified in Exhibit 2: Bates No. 012);

Exhibit 3: 2026 4 10 London, S. Bates No. 015-39:

Regarding Jane/John Doe No. 8: “Anonymous participant” (identified in Exhibit 3: Bates No. 016);

Regarding Jane/John Doe No. 9: “Anonymous participant 105” (identified in Exhibit 3: Bates No. 017-020);

Regarding Jane/John Doe No. 10: “Anonymous participant” (identified in Exhibit 3: Bates No. 022);

Regarding Jane/John Doe No. 11: “Anonymous participant 921” (identified in Exhibit 3: Bates No. 023);

Exhibit 4: 2026 4 10 Harassing Post/Info. Bates No. 164;

Regarding Jane/John Doe No. 12: “Anonymous participant” (identified in Exhibit 4: Bates No. 164);

who posted or commented in these identified and attached exhibits, using those identified Anonymous Publisher/Poster usernames.

Response: _____

QUESTION 2: For each those identified Anonymous Publisher/Poster usernames in this discovery request, identified in Question 1, and the substantive response to their identities which were provided in reply to Question 1, provide all Identifying Information in your possession, including real name, username/handle, email address, IP address(es), and any other account registration data.

Response: _____

QUESTION 3: Identify any documents or records in Meta’s possession that would allow identification of the real-name identity of those identified Anonymous Publisher/Poster usernames who posted content alleged to be harassing, abusive, targeting, or defamatory in the “Rockwall EXPOSED!” group.

Response: _____

QUESTION 4: Produce all documents or records that contain Identifying Information for those identified Anonymous Publisher/Poster usernames who authored or contributed to content that Meta’s systems flagged, reviewed, or removed for potential violation of Meta’s Community Standards or Community Use Rules.

Response: _____

QUESTION 5: For each document or record produced in response to these questions, state the date the account was created, the date of the relevant post(s), and the bates number of the produced document.

Response: _____

QUESTION 6: State whether Meta possesses any additional data (such as device information, geolocation, or linked accounts) that could further identify the Publishers or Posters referenced above.

Response: _____

QUESTION 7: If any requested Identifying Information is not produced, state the reason it is unavailable or withheld.

Response: _____

QUESTION 8: Identify the custodian(s) or person(s) most knowledgeable that provided responses about the records produced in response to this Deposition on Written Questions.

Response: _____

**SUBPOENA DUCES TECUM
(DOCUMENT PRODUCTION REQUEST FOR DISCOVERY)**

You are further commanded to produce the following documents to the undersigned attorney within thirty (30) days:

1. All account registration records, subscriber information, and Identifying Information for those identified Anonymous Publisher/Poster usernames in the “Rockwall EXPOSED!” group who is alleged to have posted harassing, abusive, targeting, or defamatory content.
2. Any and all documents or data that identify the real name, email, IP address, or other contact information of those offending identified Anonymous Publisher/Poster usernames referenced in the Written Questions above and the attached exhibits.
3. Copies of all posts, comments, or content (with metadata) identified made by the those identified Anonymous Publisher/Poster usernames, as violating Meta’s Community Standards that were authored by those identified Anonymous Publisher/Poster usernames in question.

You may satisfy this subpoena by producing the responsive documents in lieu of or in addition to, answering the Written Questions.

Failure to respond or produce may result in contempt of court and other sanctions.

Respectfully submitted,

By: /s/ KC Ashmore

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**SUBPOENA
IN THE NAME OF THE STATE OF TEXAS**

NO. _____

IN RE:
Bryan McNeal, and Dennis London,
Petitioners

REQUESTING 202 PRESUIT
DISCOVERY RE: JANE/JOHN DOES

IN THE ROCKWALL DISTRICT

COURT NO. ____

ROCKWALL COUNTY, TEXAS

**TO ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR
CALIFORNIA, OR OTHER PERSON AUTHORIZED TO SERVE AND
EXECUTE SUBPOENAS AS PROVIDED
UNDER TEXAS RULE OF CIVIL PROCEDURE 176**

Greetings:

YOU ARE HEREBY COMMANDED TO SUMMON:

Meta Legal Department's Person Most Knowledgeable/Custodian of Records, who may be found at and served with process at the following location: c/o 1 Meta Way, Menlo Park, California 94025 or by serving, Curtis Joseph "C.J." Mahoney, Chief Legal Officer at Meta, 1 Meta Way, Menlo Park, or anywhere he/she or they may be found,

to appear and testify IN PERSON at a Deposition on Written Questions, in the above Cause at the Address: Meta Legal Department, 1 Meta Way, Menlo Park, California 94025 not later than, Monday, June 22, 2026, at 1:30 P.M., P.S.T., therein to give testimony in the matter of the above Cause before this Court, and to bring with him/her all RECORDS,

REPORTS, WRITINGS, RECORDINGS, ETC., in his/her possession, care, custody, or control, regarding the Petitioners' case inquiry, as styled above, for review and copying as determined, including those records requested in the deposition on written questions above, and to remain therein at the DEPOSITION from day to day and from time to time until discharged by the completion of the Deposition on Written Questions, or the Satisfactory tendering of responsive information and documents in lieu of deposition, discharge by the Court or by Attorney KC Ashmore, an Officer of the Court.

Texas Rules of Civil Procedure 176.8(a): CONTEMPT: Failure by any person without adequate excuse to obey a subpoena served upon that person may be deemed a contempt of the court from which the subpoena is issued or a district court in the county in which the subpoena is served and may be punished by fine or confinement, or both.

This DEPOSITION Subpoena is issued on _____ with the recipient ordered to appear and give testimony on or before: **June 22, 2026, at 1:30 P.M., P.S.T.**, the instance of the **Petitioners**, in the above-referenced Cause, upon the order of, by, and through his attorney of record, **KC Ashmore**, an Officer of the Court.

KC Ashmore, Attorney at Law
shall be attached
State Bar No. 24040451
902. N. Goliad
Rockwall, Rockwall County, Texas, 75087
KC@ashmorelawfirm.com
e-serve@ashmorelawfirm.com
Tel.: (972) 325-5938; Fax: (972) 349-1759

Witness Fee: \$ 11.00 cash tender

/s/ KC Ashmore
KC Ashmore

PROOF OF SERVICE
ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS PER RULE 176
T.R.C.P.

I, the undersigned witness named in this Subpoena, do hereby acknowledge receipt of a copy thereof. I hereby accept Service of this Subpoena and will appear in said DEPOSITION on the date and at the time directed in this Subpoena.

_____ Date: _____
SIGNATURE OF WITNESS

OFFICER'S RETURN OF SERVICE

I, _____, certify I am over the age of eighteen years and not a party to the above referenced action. I certify that a true and correct copy of the attached subpoena was served on _____, by _____ on _____, 20____, at _____ .m. I further certify that all witness fees required by law were tendered at the time of service.

Dated: _____

Served by: _____

Automated Certificate of eService

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Keith Ashmore on behalf of Keith Ashmore

Bar No. 24040451

e-serve@ashmorelawfirm.com

Envelope ID: 113942762

Filing Code Description: Petition

Filing Description: Petition Requesting Discovery/Deposition Before Suit

Status as of 4/24/2026 3:29 PM CST

Case Contacts

Name	BarNumber	Email	TimestampSubmitted	Status
Diana Moreno		Diana@ashmorelawfirm.com	4/21/2026 8:52:43 PM	NOT SENT
KC Ashmore		kc@ashmorelawfirm.com	4/21/2026 8:52:43 PM	NOT SENT
Ashmore &Ashmore		e-serve@ashmorelawfirm.com	4/21/2026 8:52:43 PM	NOT SENT