

VIRGINIA:

IN THE GENERAL DISTRICT COURT FOR THE CITY OF ROANOKE

✓ VESTER FLANAGAN

Plaintiff,

v.

✓ WDBJ – 7

Defendant.

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Case No: GV14003506

Trial Date: July 14, 2014 @ 2:00 p.m.

7-8-14 11:00 AM

DISMISSAL ORDER

Upon the agreement of Plaintiff and Defendant, and it appearing to this Court that all matters of controversy between these parties have been fully and completely resolved and compromised, it is hereby,


ADJUDGED, DECREED, and ORDERED that this action be DISMISSED WITH PREJUDICE, and it is further,

ADJUDGED, DECREED, and ORDERED that this action shall be STRUCK from the active docket of this Court and placed among the ended causes.

Let the Clerk of Court send attested copies of this Dismissal Order to Plaintiff, proceeding pro se, and Defendant's counsel of record.

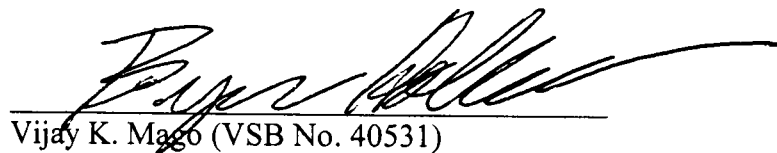
It is so ORDERED.

ENTER: 7/2/14



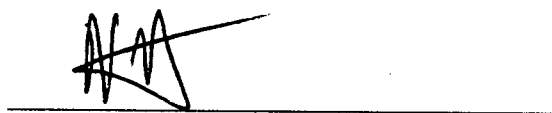
2014 JUL 1 AM10:22

WE ASK FOR THIS:



Vijay K. Mago (VSB No. 40531)
Richard Bryan Holbrook (VSB No. 86817)
LeClairRyan, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street, P.O. Box 2499
Richmond, VA 23218-2499
Phone: (804) 783-7579
Fax: (804) 783-7531

Counsel for Defendant, WDBJ – 7



Vester Flanagan
3015 Ordway Drive NW
Apartment J
Roanoke, VA 24017

Plaintiff, proceeding Pro Se

2014 JUL 1 AM 10:22

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6-24-14
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VIRGINIA:

IN THE GENERAL DISTRICT COURT FOR THE CITY OF ROANOKE

VESTER FLANAGAN

Plaintiff,

v.

WDBJ – 7

Defendant.

Case No: GV14003506

Trial Date: July 14, 2014 @ 2:00 p.m.

DEFENDANT’S CONSOLIDATED MOTION TO DISMISS & GROUNDS OF DEFENSE

The Defendant, WDBJ – 7 (“DEFENDANT”), by counsel, and pursuant to Rule 7B:2 of the Rules of the Supreme Court of Virginia and this Court’s Order entered during the May 8, 2014, return date, states the following in response to the Bill of Particulars filed against it by Plaintiff, and also advances the following arguments to support dismissal of this action with prejudice.

MOTION TO DISMISS

1. DEFENDANT seeks dismissal of Plaintiff’s claims on grounds that he fails to state any claim or causes of action literally, and instead identifies his claims with only the words “unpaid overtime,” “wrongful termination,” “retaliation,” “hostile work environment,” “racial harassment,” or discrimination in precisely the cursory manner he identified the nature and basis of his claims in the Warrant In Debt. Despite this Court’s explicit instructions to Plaintiff on May 8, 2014 regarding the fundamental purpose and obligation associated with DEFENDANT’s request for a Bill of Particulars, the Bill of Particulars lacks even a single allegation of fact that would enable DEFENDANT to prepare a meaningful defense. Given the absence of any allegations to support the causes of action identified in the Bill of Particulars,

2014 JUN 19 PM 3:26

DEFENDANT is left to prepare for trial in the abstract. Stated simply, there is nothing to inform of the scope of this action.

2. Plaintiff's fundamental, substantial pleading defect entitles DEFENDANT to summary judgment pursuant to Rule 7B:2 of the Rules of the Supreme Court of Virginia. Plaintiff cannot assert an unfamiliarity with the purpose of the Bill of Particulars and his resultant obligation to provide something more than he did with his Warrant In Debt, especially in light of this Court's instructions and directive during the initial hearing before this Court on May 8, 2014. Indeed, Plaintiff had no questions following the Court's explanation of the process.

3. Because there are no allegations of fact to support his various causes of action, Plaintiff fails to state claims for "unpaid overtime," "wrongful termination," "retaliation," "hostile work environment," "racial harassment," or discrimination under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2000e *et seq.* ("Title VII").

4. Plaintiff has failed to state a *prima facie* case of "unpaid overtime," "wrongful termination," "retaliation," "hostile work environment," "racial harassment," or discrimination or any other type of unlawful discrimination in his Bill of Particulars.

5. As a general matter, Virginia law provides that businesses must establish regular pay periods and rates of pay for employees except executive personnel. Companies must pay salaried employees at least once each month, and hourly employees at least every two weeks or twice in each month.

6. On termination of employment, the company must pay the employee all wages or salaries due him for work performed prior thereto. The final payment must be made on or before

the date on which he would have been paid for such work had his employment not ended. Virginia Code §40.1-29.

7. An employee who contends that his employer has violated Virginia law is required to lodge a complaint with the Virginia Department of Labor and Industry. The government has the authority to institute legal proceedings on behalf of an employee to enforce compliance with the wage payment statute and to collect any monies unlawfully withheld. The government can also seek fines against the employer.

8. The first of Plaintiff's claims seeks recovery for alleged unpaid overtime. The Virginia Wage Payment Act controls this claim, however, and does not private for a provide right of action. Eslami v. Global One Comm., Inc., 48 Va. Cir., 1999 WL 51864, *2 (Va. Cir. Jan. 11, 1999) (recognizing that remedy provided in statute — submitting grievance to the Commissioner of Labor & Industry — is exclusive and no private right of action exists); Pallone v. The Marshall Legacy Institute, 97 F.Supp. 2d 742 (E.D. Va. 2000) (holding also that that private individuals cannot bring lawsuit against their employers for alleged violations of Virginia Wage Payment Act).

9. Plaintiff seeks to bring a private right of action for the recovery of unpaid wages, and does not allege that any explicit contract existed between the parties, other than an at-will arrangement through which Plaintiff provided services in exchange for compensation. In the absence of an express contract between the parties giving rise to a claim for breach of contract, Virginia law bars Plaintiff's claim for unpaid compensation. To allow Plaintiff or other individuals who were employed "at will" to bring such an indefinite claim under a contract or unjust enrichment theory would circumvent Virginia law and create an impermissible private

right of action under Virginia Code § 40.1-29. Because no private right of action for unpaid overtime exists, this Court should dismiss Plaintiff's claim for unpaid overtime with prejudice.

10. DEFENDANT asserts that it never constituted Plaintiff's "employer" as defined under Title VII.

GROUND OF DEFENSE

1. The Bill of Particulars lacks even a single allegation of fact that amplifies on the causes of action asserted in both the Warrant In Debt and subsequent Bill of Particulars. Consequently, DEFENDANT knows nothing more about this action than at the time the Warrant In Debt was filed with this Court.

2. Although DEFENDANT has no allegations of fact or conclusions of law to address, it denies any allegations in the Bill of Particulars to which it has not already responded.

DEFENSES

1. The Bill of Particulars fails to state a valid claim against DEFENDANT upon which relief can be granted.

2. DEFENDANT is entitled to summary judgment pursuant to Rule 7B:2 of the Rules of the Supreme Court of Virginia, and based on Plaintiff's failure to provide a Bill of Particulars that complies with this Court's directive during the initial hearing before this Court on May 8, 2014. Indeed, Plaintiff has failed to file a Bill of Particulars that amplifies on the causes of action set forth in his Warrant In Debt in any way, as it lacks even a single allegation of fact that apprises DEFENDANT of the underlying basis and nature of Plaintiff's claims. As a consequence of this failure to comply with the Court's explicit instruction, DEFENDANT is unable to prepare an adequate defense or otherwise prepare for the trial of this matter.

3. DEFENDANT states that Plaintiff is not entitled to the relief he seeks, denies that Plaintiff has suffered damages, and calls for strict proof thereof.

4. DEFENDANT states that it intends to rely upon the defense, as may be developed through discovery and the evidence, that the doctrines of laches, estoppel, unclean hands, and waiver bar and preclude Plaintiff's action.

5. Plaintiff has failed to allege facts sufficient to establish that but for his race, sexual orientation, any purportedly protected activity, or a combination of these characteristics, the alleged adverse employment decision would not have been made.

6. Plaintiff has failed to allege facts sufficient to establish that but for any purportedly protected activity, the alleged adverse employment decision would not have been made.

7. DEFENDANT, at all times relevant to this action, acted in a lawful manner and for lawful, legitimate, and non-discriminatory business reasons. DEFENDANT acted only in good faith and has not violated any rights that may be available to Plaintiff under any applicable rule, law, regulation, or guideline.

8. DEFENDANT intends to rely upon the defense, as may be developed through discovery and the evidence, that the Court lacks jurisdiction over the subject matter of any claim or allegation of the Bill of Particulars not made the subject of a timely-filed administrative charge of discrimination and investigated by the appropriate agency.

9. Plaintiff cannot establish that he met DEFENDANT's legitimate expectations in the position he occupied prior to his discharge, and was discharged despite his qualifications and performance.

10. Plaintiff cannot establish that he was terminated under circumstances creating an inference of race discrimination, sexual orientation discrimination, harassment, retaliation, or any other type of unlawful discrimination under any other statute prohibiting discrimination in employment.

11. Plaintiff lacks any credible evidence that DEFENDANT's proffered reasons for taking the actions on which Plaintiff bases this action are false, and that discrimination in violation of Title VII (or retaliation) is the real reason for such actions.

12. Plaintiff's claims are barred to the extent they exceed the scope of the underlying EEOC Charge of Discrimination – which the EEOC dismissed summarily for lack of cause.

13. DEFENDANT states that it intends to rely upon the defense, as may be developed through discovery and the evidence, that Plaintiff has failed to join persons as parties who should be joined under Rule 3:12(a) of the Rules of Supreme Court of Virginia; therefore, Plaintiff has not complied with Rule 3:12(d).

14. DEFENDANT asserts that it intends to rely upon the defense, as may be developed through discovery and the evidence, that Plaintiff lacks standing to maintain this action or otherwise bring his claims before this Court for adjudication.

15. DEFENDANT asserts that it intends to rely upon the defense, as may be developed through discovery and the evidence, that considerations of public policy preclude Plaintiff from seeking the relief set forth in the Bill of Particulars.

16. DEFENDANT denies that it is liable to Plaintiff under any theory of law or equity.

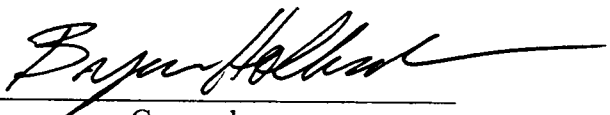
17. Plaintiff's acts, conduct, or omissions estop him from asserting the claims set forth in the Bill of Particulars.

18. DEFENDANT states that it intends to rely upon any and all other defenses, as may be developed through discovery and the evidence, and DEFENDANT reserves the right to alter, amend, or add to this Grounds of Defense and these Defenses at any time prior to trial or during trial, to conform the same to the evidence produced in discovery or at trial.

WHEREFORE, for the foregoing reasons, Defendant WDBJ – 7, by counsel, respectfully moves this Court to dismiss the Bill of Particulars with prejudice, grant its reasonable costs and expenses, and grant such further relief as the Court deems just and appropriate.

Respectfully submitted,

WDBJ – 7

By: 
Counsel

Dated: June 19, 2014

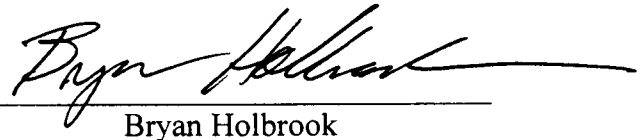
Vijay K. Mago (VSB No. 40531)
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LECLAIRRYAN, A Professional Corporation
Riverfront Plaza, East Tower
951 East Byrd Street, P.O. Box 2499
Richmond, VA 23218-2499
Phone: (804) 783-7579
Fax: (804) 783-7531

Counsel for Defendant, WDBJ – 7

CERTIFICATE OF SERVICE

I certify that a copy of the foregoing GROUNDS OF DEFENSE was transmitted via electronic mail and first class mail, postage prepaid, on this the 19th day of June, 2014, to the Plaintiff, who is proceeding pro se, at the following address of record:

Vester Flanagan
3015 Ordway Drive, NW
Apt. J
Roanoke, VA 24017



Bryan Holbrook



June 19, 2014

VIA HAND DELIVERY

Mr. Rick S. Kahl, Clerk
ROANOKE CITY GENERAL DISTRICT COURT
315 W. Church Ave. S.W.
2nd Floor
Roanoke, VA 24016-5007

7/8/14
11:00 AM

**Re: *Vester Flanagan v. WDBJ* - 7
Case No. GV 14003506**

Dear Mr. Kahl:

Enclosed for filing in the above referenced matter is the original and one copy of the Defendant's Grounds of Defense in response to Plaintiff's Bill of Particulars.

My legal assistant, Amanda Moore, is delivering the documents by hand for the purpose of receiving a stamped copy in return.

Your assistance in this matter is greatly appreciated. If you have any questions, please feel free to contact me. Thank you.

Yours very truly,

Richard Bryan Holbrook

Enclosures

cc: Vester Flanagan (Via U.S. Mail & E-mail)
Monica Taylor (Via E-mail)

E-mail: Bryan.Holbrook@leclairryan.com
Direct Phone: (540) 510-3007
Direct Fax: (540) 510-3050

1800 Wells Fargo Tower, Drawer 1200
Roanoke, Virginia 24006
Phone: 540.510.3000 • Fax: 540.510.3050
2014 JUN 19 PM 3:26

CALIFORNIA \ COLORADO \ CONNECTICUT \ MARYLAND \ MASSACHUSETTS \ MICHIGAN \ NEW JERSEY \ NEW YORK \ PENNSYLVANIA \ VIRGINIA \ WASHINGTON, D.C.

CONTESTED/SPECIAL SET FORM

JUDGE: Burkart

DATE: 7/14/14 TIME: 2:00pm EST. TIME: 1 hr.

PLT ATTY: _____ DEF ATTY: _____

****PLEASE ADD THIS CONTESTED CASE/TIME TO THE CALENDAR****

STYLE OF CASE

JUDGES INITIALS FOR SPECIAL SET: _____

DATE SLIP PREPARED: _____ BY: _____

DATE ENTERED IN COMPUTER: _____ BY: _____

CONTESTED/SPECIAL SET FORM

JUDGE: ~~BURKART~~ Talavi

DATE: 7-8-14 TIME: 11:00 AM EST. TIME: 30 MIN

PLT ATTY: _____ DEF ATTY: MAGO, VIJAY

****PLEASE ADD THIS CONTESTED CASE/TIME TO THE CALENDAR****

STYLE OF CASE

JUDGES INITIALS FOR SPECIAL SET: _____

DATE SLIP PREPARED: _____ BY: _____

DATE ENTERED IN COMPUTER: _____ BY: _____

3T (CIVIL CLAIM, FOR MONEY)
Virginia VA. CODE § 16.1-79

CITY OF ROANOKE

CITY OR COUNTY

General District Court

ND FLOOR 315 W. CHURCH AVENUE ROANOKE, VA. 24016-5007

STREET ADDRESS OF COURT

(540)853-2364

TO ANY AUTHORIZED OFFICER: You are hereby commanded to summon the Defendant(s).

TO THE DEFENDANT(S): You are summoned to appear before this Court at the above address on

May 8, 2014 9 AM to answer the Plaintiff(s)' civil claim (see below)

RETURN DATE AND TIME

3/29/14

DATE ISSUED

[] CLERK [] DEPUTY CLERK [] MAGISTRATE

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of

\$ 25,000 net of any credits, with interest at 6 % from date of DOJ until paid,

\$ 58.00 costs and \$ N/A attorney's fees with the basis of this claim being

[] Open Account [] Contract [] Note [] Other (EXPLAIN) upaid overtime, harassment (race, sexual), punitive,

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] cannot be demanded

3/27/14

DATE

[] PLAINTIFF [] PLAINTIFF'S ATTORNEY [] PLAINTIFF'S EMPLOYEE/AGENT

CASE DISPOSITION

JUDGMENT against [] named Defendant(s) []

for \$ net of any credits, with interest at % from date

of until paid, \$ costs and \$ attorney's fees

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] CANNOT BE DEMANDED

[] JUDGMENT FOR [] NAMED DEFENDANT(S) []

[] NON-SUIT [] DISMISSED settled

Defendant(s) Present? [] YES

[] NO

7-2-14

DATE

JUDGE

CASE NO.

GVI40035006
Flanagan, Vester L
PLAINTIFF(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

3015 Ordway Dr NW
Unit J Roanoke VA 24017

v.

DEFENDANT(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

Jeffrey Marks (R/A)
WDBJ-7, D.C. R
2807 Herdber Jr R2 Roanoke VA 24017

WARRANT IN DEBT

TO DEFENDANT: You are not required to appear; however, if you fail to appear, judgment may be entered against you. See the additional notice on the reverse about requesting a change of trial location.

[] To dispute this claim, you must appear on the return date to try this case.

[] To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars 5-2-14 ORDERED 5-29-14 DUE

Grounds of Defense 5-8-14 ORDERED 6-19-14 DUE

ATTORNEY FOR PLAINTIFF(S)

ATTORNEY FOR DEFENDANT(S)

HEARING DATE AND TIME

5/8/14 9 AM

21848

7-8-14 11 AM

2-14-14

2 IN PR

JUDGMENT PAID OR SATISFIED PURSUANT TO ATTACHED NOTICE OF SATISFACTION.

DATE

CLERK

DISABILITY ACCOMMODATIONS for loss of hearing, vision, mobility, etc., contact the court ahead of time.

RETURNS: Each defendant was served according to law, as indicated below, unless not found.

NAME <u>corp Monica Taylor</u>	
ADDRESS	
CORPORATION	
<input type="checkbox"/> PERSONAL SERVICE	<input type="checkbox"/> PERSONAL SERVICE
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.	
By <u>W.D. 155</u>	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	<input type="checkbox"/> Served on Secretary of the Commonwealth
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE	for

NAME	
ADDRESS	
<input type="checkbox"/> PERSONAL SERVICE	<input type="checkbox"/> PERSONAL SERVICE
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By <u>W.D. 155</u>	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	<input type="checkbox"/> Served on Secretary of the Commonwealth
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE	for

NAME	
ADDRESS	
<input type="checkbox"/> PERSONAL SERVICE	<input type="checkbox"/> PERSONAL SERVICE
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By <u>W.D. 155</u>	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	<input type="checkbox"/> Served on Secretary of the Commonwealth
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE	for

OBJECTION TO VENUE:

To the Defendant(s): If you believe that Plaintiff(s) should have filed this suit in a different city or county, you may file a written request to have the case moved for trial to the general district court of that city or county. To do so, you must do the following:

1. Prepare a written request which contains (a) this court's name, (b) the case number and the "return date" as shown on the other side of this form in the right corner, (c) Plaintiff(s)' name(s) and Defendant(s)' name(s), (d) the phrase "I move to object to venue of this case in this court because" and state the reasons for your objection and also state in which city or county the case should be tried, and (e) your signature and mailing address.
2. File the written request in the clerk's office before the trial date (use the mail at your own risk) or give it to the judge when your case is called on the return date. Also send or deliver a copy to plaintiff.
3. If you mail this request to the court, you will be notified of the judge's decision.

I certify that I mailed a copy of this document to the defendants named therein at the address shown therein on

3/27/14
DATE

- ☐ Plaintiff
☐ Plaintiff's Atty.
☐ Plaintiff's Agent

Fi. Fa. issued on

Interrogatories issued on:

Garnishment issued on

WARRANT IN DEBT (CIVIL CLAIM FOR MONEY)

Commonwealth of Virginia VA CODE § 16.1-79

CITY OF ROANOKE

General District Court

CITY OR COUNTY

2ND FLOOR 315 W. CHURCH AVENUE ROANOKE, VA. 24016-5007

STREET ADDRESS OF COURT

(540)853-2364

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May 8, 2014 9 AM to answer the Plaintiff(s)' civil claim (see below)

RETURN DATE AND TIME

DATE ISSUED

[] CLERK [] DEPUTY CLERK [] MAGISTRATE

CLAIM: Plaintiff(s) claim that Defendant(s) owe Plaintiff(s) a debt in the sum of

\$ 25,000 net of any credits, with interest at 6 % from date of DOJ until paid,

\$ 58.00 costs and \$ N/A attorney's fees with the basis of this claim being

[] Open Account [] Contract [] Note [] Other (EXPLAIN) unpaid overtime, harassment (sexual), punitive,

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] cannot be demanded

DATE

[] PLAINTIFF [] PLAINTIFF'S ATTORNEY [] PLAINTIFF'S EMPLOYEE/AGENT

CASE DISPOSITION

JUDGMENT against [] named Defendant(s) []

for \$ net of any credits, with interest at % from date

of until paid, \$ costs and \$ attorney's fees

HOMESTEAD EXEMPTION WAIVED? [] YES [] NO [] CANNOT BE DEMANDED

[] JUDGMENT FOR [] NAMED DEFENDANT(S) []

[] NON-SUIT [] DISMISSED settled

Defendant(s) Present? [] YES

[] NO

DATE

JUDGE

CASE NO.

GVI40035006
Flanagan, Yester L
PLAINTIFF(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

3015 Ordway Dr NW
Unit J Roanoke VA 24017

v.

DEFENDANT(S) (LAST NAME, FIRST NAME, MIDDLE INITIAL)

Jeffrey Marks (R/A)
WDDJ-7, INC
2807 Hardbier Rd Roanoke VA 24017

WARRANT IN DEBT

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[] To dispute this claim, you must appear on the return date to try this case.

[] To dispute this claim, you must appear on the return date for the judge to set another date for trial.

Bill of Particulars

ORDERED

Grounds of Defense

ORDERED

ATTORNEY FOR PLAINTIFF(S)

ATTORNEY FOR DEFENDANT(S)

HEARING DATE AND TIME

5/8/14 9 AM

7-8-14 11 AM

7-14-14

2:15 PM

JUDGMENT PAID OR SATISFIED PURSUANT TO ATTACHED NOTICE OF SATISFACTION.

DATE

CLERK

DISABILITY ACCOMMODATIONS for loss of hearing, vision, mobility, etc., contact the court ahead of time.

4-MB
58-
3/27/14

RETURNS: Each defendant was served according to law, as indicated below, unless not found.

NAME	
ADDRESS	
.....	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
Being unable to make personal service, a copy was delivered in the following manner:	
<input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above.	
.....	
<input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)	
<input type="checkbox"/> Served on Secretary of the Commonwealth	
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE for	

NAME	
ADDRESS	
.....	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
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DATE for	

NAME	
ADDRESS	
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<input type="checkbox"/> Served on Secretary of the Commonwealth	
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE for	

OBJECTION TO VENUE:

To the Defendant(s): If you believe that Plaintiff(s) should have filed this suit in a different city or county, you may file a written request to have the case moved for trial to the general district court of that city or county. To do so, you must do the following:

1. Prepare a written request which contains (a) this court's name, (b) the case number and the "return date" as shown on the other side of this form in the right corner, (c) Plaintiff(s)' name(s) and Defendant(s)' name(s), (d) the phrase "I move to object to venue of this case in this court because" and state the reasons for your objection and also state in which city or county the case should be tried, and (e) your signature and mailing address.
2. File the written request in the clerk's office before the trial date (use the mail at your own risk) or give it to the judge when your case is called on the return date. Also send or deliver a copy to plaintiff.
3. If you mail this request to the court, you will be notified of the judge's decision.

I certify that I mailed a copy of this document to the defendants named therein at the address shown therein on	
DATE	<input type="checkbox"/> Plaintiff <input type="checkbox"/> Plaintiff's Atty. <input type="checkbox"/> Plaintiff's Agent
Fi. Fa. issued on	
Interrogatories issued on:	
Garnishment issued on	
.....	

SUBPOENA DUCES TECUM

Commonwealth of Virginia VA CODE, §§ 16.1-89, 16.1-131, 16.1-265, Rules 3A:12, 4:9(c)

City of Roanoke General District Court ☒ General District Court

2nd Floor 916 W. Church Ave.

Roanoke, Virginia 24016-5007

☐ Juvenile and Domestic Relations District Court

STREET ADDRESS OF COURT

REQUEST FOR SUBPOENA DUCES TECUM

- A. I request that a subpoena duces tecum be issued to require the custodian named at right or someone acting on his or her behalf to produce the items ☐ described below ☒ on the attached request for issuance of a subpoena duces tecum.

see attached

ITEMS TO BE PRODUCED

1. To be delivered to:

☒ this Court at the above address on:

☐ the clerk's office of this court at the above address (documents only) on or before:

5/11/14 4 PM

DATE AND TIME

2. (Civil Cases only) To be made available to the requesting party at:

LOCATION

for

TIME PERIOD

5-29-14

to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control. See reverse.

- B. ☐ I further request that the custodian also appear in person before this Court at the date and time shown above in Paragraph A.1. with the items subpoenaed.
- C. I certify that a copy has been mailed or delivered to counsel of record and/or, if any, to parties not represented by a lawyer.
- D. (Criminal cases only) I certify under oath that the items to be produced are material to the proceedings and are in the possession of a person who is not a party to this case.

DATE

SIGNATURE

☐

PLAINTIFF

☐

DEFENDANT

☐

ATTORNEY FOR

☐

PLAINTIFF

☐

DEFENDANT

Vester Flanagan

PRINT NAME

Sworn and subscribed before me on

April 2, 2014

My Commission expires

☐ CLERK ☐ DEPUTY CLERK ☒ NOTARY PUBLIC

SUBPOENA DUCES TECUM

TO ANY AUTHORIZED OFFICER: You are commanded to serve this SUBPOENA DUCES TECUM on the Custodian.

TO THE CUSTODIAN: You or someone acting in your behalf are commanded to produce the items described above, as requested above. If Paragraph B., above, is also checked, you are further commanded to appear in person before this court at the date and time shown above with the items subpoenaed by this subpoena duces tecum and to be ready to testify in response to questions concerning these items. Any objection to such production must be made promptly in writing to the Court.

WARNING: Failure to comply with the terms of this subpoena duces tecum may result in your being fined and/or jailed for contempt of court.

DATE

☐

CLERK

☐

JUDGE

☐

MAGISTRATE

22900

RETURN DATE

CASE NO.

5/8/14 9AM EV 1400 3506

SUBPOENA DUCES TECUM

☐ COMMONWEALTH OF VIRGINIA

☒ CITY ☐ COUNTY ☐ TOWN OF

Vester Flanagan 7-8-14 11A

3015 Ordway Dr NW

☐ PLAINTIFF(S)

Unit 5, Roanoke, VA 24017

2 in pr

In re/V.

WDBJ-7 Jeffrey Mark (HA)

DEFENDANT(S)

2807 Hersheberger Rd

Roanoke, VA 24017

CUSTODIAN

Jeffrey Mark (HA) WDBJ-7

NAME

ADDRESS/LOCATION

WDBJ-7 2807 Hersheberger Rd

REQUESTED ON BEHALF OF: Roanoke VA 24017

☐ COMMONWEALTH

☒ PLAINTIFF(S)

☐ CITY, COUNTY or TOWN

☒ DEFENDANT(S)

☐ JUVENILE

14-7713
12
3/27/14

NOTICE:

Upon receipt of the subpoenaed documents, the requesting party must, if requested, provide true and full copies of those documents to any other party or to the attorney for any other party, provided the other party or attorney for the other party pays the reasonable cost of copying or reproducing those documents. This does not apply when the subpoenaed documents are returnable to and maintained by the clerk of the court in which the action is pending. Va. Code § 8.01-417

CORP. Monica Taylor

CORPORATION

Executed this within WDBS on the

040714
by Monica Taylor

By M. W. Harty
Deputy Sheriff

RETURNS: Each respondent was served according to law, as indicated below, unless not found.

NAME.....	
ADDRESS.....	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
<input type="checkbox"/> Being unable to make personal service, a copy was delivered in the following manner: <input type="checkbox"/> Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation of recipient to party named above. <input type="checkbox"/> Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.) <input type="checkbox"/> Served on Secretary of the Commonwealth.	
<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE for	
NAME.....	
ADDRESS.....	
<input type="checkbox"/> PERSONAL SERVICE	Tel. No.
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<input type="checkbox"/> NOT FOUND	SERVING OFFICER
DATE for	

SUBPOENA DUCES TECUM

Commonwealth of Virginia VA. CODE §§ 16.1-89, 16.1-131, 16.1-265, Rules 3A:12, 4:9(c)

☒ General District Court

CITY OR COUNTY
Roanoke, Virginia 24013-5007

☐ Juvenile and Domestic Relations District Court

Roanoke, Virginia 24013-5007

STREET ADDRESS OF COURT

REQUEST FOR SUBPOENA DUCES TECUM

- A. I request that a subpoena duces tecum be issued to require the custodian named at right or someone acting on his or her behalf to produce the items ☐ described below ☒ on the attached request for issuance of a subpoena duces tecum.

see attached

ITEMS TO BE PRODUCED

1. To be delivered to:

☒ this Court at the above address on:

☐ the clerk's office of this court at the above address (documents only) on or before:

5/1/14 4 PM

DATE AND TIME

2. (Civil Cases only) To be made available to the requesting party at:

LOCATION for TIME PERIOD
to permit such party or someone acting in his or her behalf to inspect and copy, test or sample such tangible things in your possession, custody or control. See reverse.

- B. ☐ I further request that the custodian also appear in person before this Court at the date and time shown above in Paragraph A.1. with the items subpoenaed.
C. I certify that a copy has been mailed or delivered to counsel of record and/or, if any, to parties not represented by a lawyer.
D. (Criminal cases only) I certify under oath that the items to be produced are material to the proceedings and are in the possession of a person who is not a party to this case.

4/2/14

DATE

SIGNATURE ☐ PLAINTIFF ☐ DEFENDANT ☐ ATTORNEY FOR ☐ PLAINTIFF ☐ DEFENDANT

Vester F. Flanagan

PRINT NAME

Sworn and subscribed before me on

April 2, 2014

My Commission expires

☐ CLERK ☐ DEPUTY CLERK ☒ NOTARY PUBLIC

SUBPOENA DUCES TECUM

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WARNING: Failure to comply with the terms of this subpoena duces tecum may result in your being fined and/or jailed for contempt of court.

04/02/14

DATE

☒ CLERK ☐ JUDGE ☐ MAGISTRATE

RETURN DATE

CASE NO.

5/8/14 9AM 6V14003506

SUBPOENA DUCES TECUM

☐ COMMONWEALTH OF VIRGINIA
☒ CITY ☐ COUNTY ☐ TOWN OF

Vester Flanagan

3015 Ordway Dr NW

PLAINTIFF(S)

Unit 3, Roanoke, VA 24017

In re/V.

WDBJ-7 Jeffrey Marks (RA)

DEFENDANT(S)

2807 Herstberger Rd

Roanoke, VA 24017

CUSTODIAN

Jeffrey Marks (RA) WDBJ-7

NAME

ADDRESS/LOCATION

WDBJ-7 2807 Herstberger Rd

REQUESTED ON BEHALF OF: Roanoke VA 24017

☐ COMMONWEALTH
☒ PLAINTIFF(S)
☐ CITY, COUNTY or TOWN
☐ DEFENDANT(S)
☐ JUVENILE

14-773
3/27/14

NOTICE:

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RETURNS: Each respondent was served according to law, as indicated below, unless not found.

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<input type="checkbox"/> NOT FOUND SERVING OFFICER
..... for	
DATE	
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ADDRESS.....	
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<input type="checkbox"/> NOT FOUND SERVING OFFICER
..... for	
DATE	

SUBPOENA DUCES TECUM (Addendum)

In addition to all time cards for Vester Flanagan from 3/29/12 – 2/1/13, all website articles written by Vester Flanagan from 3/29/12 – 2/1/13 with time stamps to prove I was at work, all electronic badge/door records for Vester Flanagan from 3/29/12 – 2/1/13 to prove I was at work during specific time periods and all scripts written by Vester Flanagan between 3/29/12 – 2/1/13, I would also like to subpoena personnel records for the following employees:

Lynn Eller

Adam Ward

Trevor Fair

Andy May

Rob Chewning

Elizabeth Harrington

Juston McCloud

Susan Bahaorich

David Seidel

Greg Baldwin

Dan Dennison

Melanie Crabtree

Kimberly Pinckney

Hollani Davis

Frankie Jupiter

Nadine Maeser

Kimberly McBroom

Nadia Singh

Orlando Salinas

(Personnel records request cont'd)

Robin Reed

Brent Watts

Travis Wells

Joe Dashiell

David Kaplan

Leo Hirsbrunner

Melissa Gaona

Karen Loftus

Tim Saunders

Chris Hurst

Jean Jadhon

Lindsey Anderson

Lauren Wood

Zach Irby

Jay Webb

Amy Morris

Jeffrey Marks

Vester Flanagan

Keith Humphrey

Natasha Ryan

Holly Pietrzak

Alison Parker

My contact information:

Vester Flanagan

3015 Ordway Drive NW

Apartment J

Roanoke, VA 24017

Cell 540-685-3231

Home 540-904-2057



May 1, 2014

May 8, 2014
RECEIVED
MAY 14 2014
CLERK OF COURT
ROANOKE, VA

VIA HAND DELIVERY

Mr Rick S. Kahl, Clerk
ROANOKE CITY GENERAL DISTRICT COURT
315 W. Church Ave. S.W.
2nd Floor
Roanoke, VA 24016-5007

Re: *Vester Flanagan v. WDBJ - 7*
Case No. GV 14003506

Dear Mr. Kahl:

Enclosed for filing in the above referenced matter is the original and one copy of the Defendant's Objections and Response to Plaintiff's Subpoena Duces Tecum, along with documents produced in response to the Plaintiff's Subpoena Duces Tecum from bates range WDBJ - 7 000001 - 000060. Please stamp the copy reflecting the date of filing and return to this office in the enclosed envelope.

Bryan Holbrook is delivering these documents by hand for the purpose of receiving a stamped copy in return. Please note that we are making a copy of these documents and the enclosed pleading available for Plaintiff's inspection as directed on the Subpoena Duces Tecum itself.

Your assistance in this matter is greatly appreciated. If you have any questions, please feel free to contact me. Thank you.

Yours very truly,

Vijay K. Mago / s/ Bryan Holbrook, Esq.
Vijay K. Mago *with permission*

VKM:nsj

Enclosures

cc: Vester Flanagan (Via Hand)
Monica Taylor (Via E-mail)

E-mail: vijay.mago@leclairryan.com
Direct Phone: 804.783.7579
Direct Fax: 804.783.7651

951 East Byrd Street, Eighth Floor
Richmond, Virginia 23219
Phone: 804.783.2003 \ Fax: 804.783.2294

CALIFORNIA \ CONNECTICUT \ MASSACHUSETTS \ MICHIGAN \ NEW JERSEY \ NEW YORK \ PENNSYLVANIA \ VIRGINIA \ WASHINGTON, D.C.

ATTORNEYS AT LAW \ WWW.LECLAIRRYAN.COM

January 30, 2014

Page 2

bcc: Robert Slepecky, Jr. (Via E-mail)

VIRGINIA:

IN THE GENERAL DISTRICT COURT FOR THE CITY OF ROANOKE

VESTER FLANAGAN

Plaintiff,

v.

WDBJ – 7

Defendant.

)
)
)
)
)
)
)
)
)
)
)

Case No: GV14003506

Return Date: May 8, 2014 @ 9:00 a.m.

**DEFENDANT’S OBJECTIONS AND RESPONSE TO
PLAINTIFF’S SUBPOENA DUCES TECUM**

COMES NOW Defendant WDBJ – 7 (“Defendant”), who has been named improperly and is not a proper party defendant, by counsel, pursuant to Rules 3A:12 and 4:9(c) of the Rules of the Supreme Court of Virginia, and for its Objections and Responses to the Subpoena Duces Tecum of Vester Flanagan (“Plaintiff”), states the following:

GENERAL OBJECTIONS

Defendant incorporates the following general objections into its specific objections to Plaintiff’s Requests in the Subpoena Duces Tecum (collectively, the “Requests”).

A. **Privilege.** Defendant objects to these Requests to the extent they seek information protected from disclosure by the attorney-client privilege, work product privilege and any other applicable privileges.

B. **Relevance.** Defendant objects to these Requests to the extent they seek information not relevant to the claims and to the extent they are not reasonably calculated to lead to the discovery of admissible evidence. Nothing in the production of documents accompanying this pleading should be construed as an admission by Defendant of the admissibility or relevance of any fact.

C. Definitions. To the extent Defendant adopts any term defined by Plaintiff, it is adopted solely for convenience in responding, and Defendant does not accept or concede that any of the terms or definitions are appropriate, descriptive, or accurate.

D. Beyond The Scope of Discovery Established in Rule 4:1(b). Defendant objects to these Requests to the extent that they may be otherwise construed to require responses beyond the “scope of discovery” established in Rule 4:1(b)(1).

E. No Waiver. In providing these responses, Defendant does not in any way waive, but rather intends to preserve:

- (i) All objections as to competency, relevancy, materiality, and admissibility;
- (ii) All objections as to vagueness, ambiguity, and undue burdensomeness; and
- (iii) All rights to object on any ground to the use of these responses in any proceeding.

F. Confidential Business Information. Defendant objects to these Requests to the extent they seek confidential business information, proprietary information, and trade secrets. Defendant will not disclose such information in the absence of a court order compelling such production.

G. Equally Available Documents. To the extent these Requests seek disclosure of information obtainable from sources to which Plaintiff has as ready and equal access as Defendant, and to the extent that such information is obtainable from another source that is more convenient, less burdensome, or less expensive, Defendant objects to producing such information.

Requests for Production

In addition to all time cards for Vester Flanagan from 3/29/12 – 2/1/13, all website articles written by Vester Flanagan from 3/29/12 – 2/1/13 with time stamps to prove I was at work, all electronic badge/door records for Vester Flanagan from 3/29/12 – 2/1/13 to prove I was at work during specific time periods and all scripts written by Vester Flanagan between 3/29/12 – 2/1/13, I would also like to subpoena personnel records for the following employees:

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Chris Hurst
Jean Jadhon
Lindsey Anderson
Lauren Wood
Zach Irby
Jay Webb
Amy Morris
Jeffrey Marks
Vester Flanagan
Keith Humphrey
Natasha Ryan
Holly Pietrzak
Alison Parker

OBJECTION:

Defendant objects to this Request on the grounds that it is overly broad, unduly burdensome, not reasonably calculated to lead to the discovery of admissible evidence, and seeks production of documents that are immaterial or irrelevant to the claims at issue in this litigation. Defendant further objects on grounds that aspects of this Request are not tailored at all to seek information relevant to this action and, therefore, this Request is not reasonably calculated to lead to the discovery of admissible evidence regarding the claims at issue in this litigation. Finally, Defendant objects on grounds that Plaintiff seeks discovery of information relating to claims or allegations that have never been made the subject of a timely-filed administrative charge of discrimination that has been investigated subsequently by the appropriate agency.

RESPONSE:

Without waiving the foregoing objection, Defendant identifies the following documents as responsive to the pending Subpoena Duces Tecum.

1. "all time cards" – We have located and printed all time card records reflecting the hours that Vester Flanagan worked for WDBJ from the inception of his employment through his date of termination, and these records have been provided for review by Vester Flanagan.
2. "website articles with stamps" – We are unable to provide any documents in response to this request. The stories we post to the internet are archived by a third party vendor after 90 days. Given that Vester Flanagan's employment ended considerably longer than 90 days ago, any articles he authored have since been archived, such that we can not produce them. Also, any website articles sought by Vester Flanagan are as accessible to him as they are to us – given that we are both limited to searching the internet in the same ways.
3. "electronic door/back records" –WDBJ uses a new system to control access that has been in use for approximately 1.5 months. This fact notwithstanding, the prior system was NEVER used to track time or attendance, because it was routinely held open for more than one person at a time, was sometimes left open for extended periods, or was otherwise operated in a way that prevented it from tracking individual comings and goings accurately. Thus, we have nothing to produce in response to this aspect of the document request.
4. "computer script records to show time stamp" – The scripts database no longer has any record of Vester Flanagan's hours of work when employed, because the system is purged routinely to address capacity issues. Also, this system is not an accurate record of hours worked, because it is often true that the last person to access a script (and therefore own the date and time stamp) is a producer making final revisions (rather than the original writer/reporter). Thus, we have nothing to produce in response to this aspect of the document request.

5. "personnel files" – The personnel files requested are proprietary to Defendant and have nothing to do with the claims at issue in this litigation. Defendant's objections notwithstanding, it has produced a copy of Plaintiff's personnel file as maintained during the limited period of time that Plaintiff was an employee of Defendant. Given the proprietary nature of the files relating to all other current or former employees listed in the Request, coupled with their lack of relevance to the claims at issue in this litigation, we have nothing more to produce in response to this aspect of the document request.

Dated: May 1, 2014

Respectfully submitted,

WDBJ – 7

By: Vijay K. Mago / By Bryan Halbrook
Counsel *with permission* 26

Vijay K. Mago (VSB No. 40531)
LeClairRyan, A Professional Corporation
Riverfront Plaza – East Tower
951 East Byrd Street, 8th Floor
Richmond, Virginia 23219
Telephone: (804) 783-2003
Facsimile: (804) 783-2294

CERTIFICATE OF SERVICE

I hereby certify that on this 1st day of May, 2014, I transmitted a true and correct copy of the foregoing DEFENDANT'S OBJECTIONS AND RESPONSE TO PLAINTIFF'S SUBPOENA DUCES TECUM via HAND DELIVERY to the Plaintiff, who is proceeding pro se.

Vijay K. Mago by *Erin Hallab, Esq.*
Vijay K. Mago with permission

5/8/14
Donna Sweetie -

please set this case
aside after updating -
this man is coming
by tomorrow to review
it.

ven
never came by on 5/9/14
DAn

REQUESTOR

Vester Flanagan

DATE SUBMITTED

05-09-14

PHONE NUMBER (Important)

540-685-3231 cell

As specified under the terms of the Freedom of Information Act, the Clerk's Office will process all requests as time allows in conjunction with daily operations. Processing order will be based upon the date of submission and the number/type of actions requested. Requests with incomplete or incorrect information may experience delays or non-completion. Because of our volume, the court assumes no responsibility for tracking down, completing, or correcting information.

Actions should be picked up (if applicable) or a self-addressed, stamped envelope should be provided for mailing. Copy fees currently requested remain effect. Unless the specific action requires immediate processing under law, the Clerks Office cannot guarantee delivery of service on actions any sooner than five (5) working days (Freedom of Info Act). Large volume requests may take an additional seven (7) days or longer under this law. It is our goal and our intention to process all requests well within this time frame.

WARNING: THE COURT MAY BE UNABLE TO PROCESS ANY REQUEST WITHOUT PROPER CASE, DATE, OR OTHER REQUESTED INFORMATION.

<u>CASE NUMBER</u>	<u>COURT DATE</u>	<u>CASE STYLE (? VS.?)</u>	<u>ACTION</u>	<u>CREDITS</u>	<u>DATE/CLERK COMPLETED</u>
<u>6V14003500</u>	<u>5-9-14</u>	<u>Flanagan vs. WPBJ</u>			<u>wants to look at case</u>
					<u>a decide if wants</u>
					<u>copies</u>

- CHOOSE THE TYPE OF ACTION YOU'RE REQUESTING BY LISTING THE NUMBER BELOW:**
1. REGULAR ABSTRACT (Copy of Judgment) May be used to record a lien against real estate in Circuit Court. \$1.00
 2. TRIPLE CERTIFICATE ABSTRACT (Out of State) \$1.00 per request.
 3. DETINUE PICKUP ORDER (DC-414) (To actually take Possession of an item for which you have been given Judgment) \$25.00 per case. \$12.00 for each additional service.
 4. LEVY OR FIERI FACIAS (DC-467) (To be used to place a Lien against Personal Property or a Financial Institution) \$25.00 per case. \$12.00 for each additional service.
 5. COPY OF NOTICE OF SATISFACTION (DC-458) or a letter of satisfaction reading case is satisfied from a previous judgment.



WDBJ Television, Inc.
P.O. Box 7
Roanoke, VA 24022-0007
(540) 344-7000

EMPLOYMENT APPLICATION

It is the policy of this station not to discriminate in its employment and personnel practices because of a person's race, color, creed, religion, national origin, sex, age, disability or veteran's status. Discriminatory employment practices are specifically prohibited by the Federal Communications Commission. If you believe your equal employment rights have been violated, you may contact the FCC in Washington, D.C. 20054, or other appropriate state or local agency.

PERSONAL

Date: 2/22/12 (Bryce Williams)
Name: Flanagan Vester
Address: 2216 Garret Dr Vallero CA 94591
Phone: 707 552 2959 Social Security Number: 565 89 1796

Are you eligible for legal employment in the U.S.? ☒ Yes ☐ No

Have you ever been convicted of a felony within the last five years which has not been annulled or expunged by a court? ☐ Yes ☒ No

List all convictions showing offense and date: _____

A conviction record is not an absolute bar to employment. The time, nature and number of convictions, the job-relatedness of each conviction and efforts at rehabilitation will be considered.

If necessary for the position for which you are applying, what office equipment have you operated? _____

Would you work ☒ Full-time ☐ Part-time ☐ Temporary

Specify days and hours if part-time: _____

Position desired Multi-media Journalist

Are there any other experiences, skills, or qualifications which you feel would especially fit you for work with this station?

videography, editing, public relations,
writing, public speaking, producing

Referral Source: ☐ Advertisement ☐ Relative ☐ Employment
☐ Walk-in ☐ Friend ☒ Other Agent
☐ Employment Agency

Notes: If question or statement does not apply to you, write N/A

12/03

(Turn to next page)

WDBJ-7 000001

R E C O R D O F E D U C A T I O N

School	Name and Location of School	Type of Course And Degree	Check Last Year Completed				Did You Graduate?	Grade Average
High	5 Kings High School	HS Diploma	1	2	3	4	Yes	3.5
	Oakland, CA							
College	San Francisco State University	BA Broadcast Journalism	1	2	3	4	Yes	3.7
	San Francisco CA							
Other (Specify)			1	2	3	4		

Job-related extracurricular activities: _____

P E R S O N A L R E F E R E N C E S

(not former employers or relatives)

Name and Occupation	Address	Phone Number
Carrey Montgomery consultant MDG	111 Jarvis Cir Sacramento, CA 95834	916 - 928-0419
Kristen Stancil Public Relations	3921 Princeton Lakeside Atlanta GA 30331 SW	404 - 313-7458
Phillip Williams Meteorologist	1025 Director Ct Suite E Greenville NC 27858	252 - 341-4714

List below all present and past employment beginning with your most recent.
Please fill out completely even if you have attached a resume!

Name, address and phone of company and type of business	From	To	Name of supervisor and title
ND6 Interactive	Mo. Yr.	Mo. Yr.	Eric Martin
2216 Garnet Dr	12 04	2 12	owner
Village CA 94591 707 653 6100	Starting Salary		Describe in detail the work that you did:
Reason for leaving: Still employed	42k		
	Salary at leaving 48k		
			Develop & maintain communication plan, New Media strategies

Name, address and phone of company and type of business	From	To	Name of supervisor and title
WNCT-TV	Mo. Yr.	Mo. Yr.	Kristen Stancil
3221 S. Evans St. Greenville SC 27834	8 02	11 04	producer
252-355 8500	Starting Salary		Describe in detail the work that you did:
Reason for leaving: career opportunity	27k		
	Salary at leaving 29k		
			reporting, producing, editing, videography, anchoring

Name, address and phone of company and type of business	From	To	Name of supervisor and title
Pacific Garage Electric	Mo. Yr.	Mo. Yr.	Joe Falcone
111 Alameda Blvd	8 01	8 02	supervisor
Santa Ana CA 92703 915 973-7000	Starting Salary		Describe in detail the work that you did:
Reason for leaving: career up	18k		
	Salary at leaving 18k		
			customer service, answering calls, logging info in database

Name, address and phone of company and type of business	From	To	Name of supervisor and title
WTWC-TV	Mo. Yr.	Mo. Yr.	Eric Winters
8440 Deerlak 5 Tallahassee FL 32310 850 893 4140			producer
Reason for leaving: completed contract	Starting Salary		Describe in detail the work that you did:
	39k		
	Salary at leaving 36k		
			producing, photographing, anchoring, reporting

May we contact your present employer? ☒ Yes ☐ No

Is any additional information relative to change of name necessary to enable a check on your work record? If yes, explain.

Have you ever been bonded? ☐ Yes ☒ No If yes, what job(s) # _____

I certify that this information is true and correctly recorded. I understand that any false statement or omission of fact shall be cause for not being employed, or for dismissal if employed. I authorize this company to obtain personal and ability references from personal, education and previous employment sources and hereby release former employers named herein from all liability for issuing such information.

Thank you for considering WDBJ Television, Inc.

(Signature of Applicant)

WDBJ-7 000003

BRYCE WILLIAMS

Bryce-williams-tvnews@yahoo.com

EMPLOYMENT

COMMUNICATIONS DIRECTOR *Legal name - Nestor Finnigan* 2004-PRESENT
NDG Interactive *Sacramento, CA*
Develop and maintain comprehensive communications plans for brand development; integrate online and new media strategies into overall communications plan; create and maintain systems for tracking and reporting media placement and contacts.

REPORTER/ANCHOR/PRODUCER 2002-2004
WNCT *Greenville, NC*
Completed comprehensive reports using government records, court documents, and police reports; engaged viewers via social media and created news content for use online; anchored and produced weekend newscasts; weekend managing editor.

CUSTOMER SERVICE REPRESENTATIVE 2001-2002
Pacific Gas & Electric *San Jose, CA*
Took more than 150 calls daily; provided customers with information about energy bills; used interpersonal skills to calm angry customers.

CUSTOMER SERVICE FRAUD INVESTIGATION UNIT 2000-2001
Bank of America (Jackson Personnel) *San Francisco, CA*
Assisted investigators in ATM/Debit cards department; documented claims regarding stolen and lost debit cards; smoothly handled high call volume of 100+ calls daily.

NEWS REPORTER/ANCHOR/PRODUCER 1999-2000
WTWC *Tallahassee, FL*
Anchored weekend newscasts and reported live during the week; developed and maintained contacts in order to generate story leads; oversaw story content and placement in weekend newscasts.

GENERAL ASSIGNMENT REPORTER 1997-1999
WTOG *Savannah, GA*
Covered news in high-crime market; worked with photogs and shot own stories; fill-in anchor.

PRODUCTION ASSISTANT, CLASSIFIED AD DEPARTMENT 1995-1997
Independent Newspaper Group *Burlingame, CA*
Oversaw classifieds section; created visually compelling ads; made cold calls to prospective clients.

GENERAL ASSIGNMENT REPORTER 1995
KMID *Midland, TX*
Monitored scanners; represented station at community events; cultivated news sources.

PRODUCTION ASSISTANT/WEEKEND NEWS WRITER 1993-1995/1996-1997
KPIX *San Francisco, CA*
Conducted research; obtained file footage for packages; operated teleprompter.

EDUCATION

BA, Broadcast Journalism- San Francisco State University

AFFILIATIONS

National Association of Black Journalists

WDBJ-7 000004



March 6, 2012

Vester Flanagan
2216 Garnet Drive
Vallejo, CA 94591

Dear Vester:

On behalf of WDBJ Television, I am pleased to offer you a position as Multimedia Journalist. As Dan Dennison discussed with you, your starting compensation will be \$17.31 per hour, which is equivalent to an annual amount of \$36,000.00. This position is considered a non-exempt position for purposes of federal wage-hour law, which means that you are eligible for overtime time pay for hours actually worked in excess of 40 in a given workweek.

In addition to your compensation, you will be eligible to receive the benefits which are offered to all full-time employees of WDBJ Television. You will become eligible for health benefits after 30 days of employment. You will receive more detailed information regarding these benefits within the first two weeks of employment.

WDBJ Television will reimburse you up to \$500.00 for moving expenses provided you submit receipts for your charges. Annually, you will be reimbursed up to \$125 for make-up allowance provided you submit receipts for your charges.

We recognize that you retain the option, as does the Company, of ending your employment with the Company at any time, with or without notice and with or without cause. As such, your employment with the Company is at-will and neither this letter nor any other oral or written representations may be considered a contract for any specific period of time.

We greatly look forward to having you join WDBJ and become a member of our team!

Sincerely,

Monica Taylor
HR Business Partner



MyNetworkTV



PERSONNEL INFORMATION

March 20, 2012

We are pleased to announce that **Bryce Williams** will be joining WDBJ7 as a multi-media journalist/general assignment reporter.

Bryce is currently the communications director for NDG Interactive in Sacramento, CA, and has nearly ten years of experience as a production assistant, news writer, reporter, anchor and producer in markets in California, Texas, Georgia, Florida and North Carolina. He is a graduate of San Francisco State University with a BA in broadcast journalism, is a member of the National Association of Black Journalists, and has a wealth of non-broadcast work experience which gives him a broad background for covering news.

Bryce will start on March 29.

MEMORANDUM

To: All Employees

From: Jeff Marks, President and General Manager

Re: Guidelines on Payola/Plugola

SECTION 317 AND 507 OF THE COMMUNICATIONS ACT

This memorandum concerns Sections 317 and 507 of the Communications Act of 1934, as amended. The issuance of this memorandum does not mean that we believe that there have been infractions of the law; we simply wish to remind all personnel of their obligations under the law and under the policies adopted by the Company.

Your obligations under Sections 317 and 507, and our Company's policy, can be stated very simply:

EVERY EMPLOYEE IS PROHIBITED FROM ACCEPTING ANY MONEY, SERVICE, OR OTHER VALUABLE CONSIDERATION FROM ANY PERSON OTHER THAN THE COMPANY FOR BROADCASTING ANY MATERIAL OVER THIS STATION.

EVERY EMPLOYEE HAVING ANY VOICE IN THE SELECTION OF BROADCAST MATTER IS PROHIBITED FROM: (a) ENGAGING IN ANY OUTSIDE BUSINESS OR ECONOMIC ACTIVITY WHICH WOULD CREATE A CONFLICT OF INTEREST IN THE SELECTION OF BROADCAST MATTER (b) ACCEPTING ANY FAVORS, LOANS, ENTERTAINMENT, OR OTHER CONSIDERATION FROM PERSONS SEEKING THE AIRING OF ANY BROADCAST MATTER IN RETURN THEREFORE; AND (c) PROMOTING OVER THE AIR (EXCEPT BY MEANS OF AN APPROPRIATE LOGGED COMMERCIAL ANNOUNCEMENT) ANY ACTIVITY OR MATTER IN WHICH THE EMPLOYEE HAS A DIRECT OR INDIRECT FINANCIAL INTEREST.

Your attention is also directed to the fact that Section 507 of the Communications Act of 1934, as amended, makes it a criminal offense, subject to fine of not more than \$10,000 or imprisonment of not more than one year, or both, if any employee fails to disclose to the Company any acceptance or agreement to accept from any person, other than the Company, any money, service, or other valuable consideration for the broadcast of any material over the Station.

Section 507 of the Act requires all employees and outside suppliers to tell the Station in advance if any consideration has been promised or paid to them for the broadcast of any matter.

WDBJ-7 000007

The Station is required to exercise "reasonable diligence" to obtain the necessary information. That is why employees are required to sign a statement that they either have received no such payments, or they have, that they have been reported to the Station. You will notice that the reports are to be submitted in advance. The statement to be signed is attached.

There have been misunderstandings as to when reports are required. All cases of outside employment, either present or future must be discussed with your supervisor so that we can determine if Section 507 applies. This action is necessary to protect you, as well as the Station.

Attached to this memorandum is an affidavit which you should sign after reading it and the attached copies of Sections 317 and 507 of the Communications Act of 1934, and the FCC's sponsorship identification rule (Section 73.1212).

If you have any questions about this memo, or Section 317 or 507, please discuss them with your supervisor or me

AFFIDAVIT

I Vester Flanagan hereby certify that I have read and will comply with the provisions of section 317 and 508 of the Communications Act of 1934, as amended, copies of which have been given to me. I fully understand that any person who violates Section 507 of the Act is subject to the penalties set forth in Section 507(g), consisting of fine up to \$10,000, imprisonment up to one year, or both. I have also read and will comply with the provisions of the Commissions Sponsorship Identification Rule (73.1212), a copy of which has also been given to me.

I will also comply with the policy of the Company to prohibit every employee having any voice in the selection of broadcast matter from (a) engaging in any outside business or economic activity which would create a conflict of interest in the selection of broadcast matter; (b) accepting any favors, loans, entertainment, or other consideration from persons seeking the airing of any broadcast matter in return therefore; and (c) promoting over the air (except by means of an appropriate logged commercial announcement) any activity or matter in which the employee has a direct or indirect financial interest.

I hereby signify that I have reported to the Station management all information in compliance with Section 507 of the Communications Act. Copies of the reports, if any, are attached.



Signature

4/2/12

Date

Reports Attached _____

None _____

SCHURZ COMMUNICATIONS, INC.

STANDARD POLICIES AND PROCEDURES

SECTION:	XII, CONFLICTS OF INTEREST
PAGE:	1
ISSUE DATE:	JUNE 19, 1999
SUPERCEDES:	JUNE 19, 1987
FILE NO:	212

SECTION XII. CONFLICTS OF INTEREST

A. POLICY

It is the policy of Schurz Communications, Inc. (SCI) that no funds or assets of SCI or any of its subsidiaries shall be used for any purpose or in connection with any practice which would be unlawful or contrary to the generally accepted code of ethics of the environment in which SCI is engaged in business.

Consistent with this policy, the following are specifically forbidden in SCI or its subsidiaries:

1. Undisclosed or unrecorded funds or assets
2. False entries in the books or records
3. Expenditures for any purpose other than that stated in the documents or records authorizing and/or supporting such expenditures

In addition, each employee is to avoid situations in which his or her personal interest could conflict with, or appear to conflict with the interests of SCI.

From time to time, as appropriate, at least annually, all managers shall inform employees for whose conduct they are responsible of this policy. All employees shall promptly report to SCI's Chief Financial Officer any knowledge of any conduct prohibited by this policy.

SCI, as sole shareholder, desires that the governing boards of all subsidiaries shall implement this policy with such additional rules as may be desired so long as they are not inconsistent with this policy.

The provisions of this policy are mandatory on all personnel. Appropriate disciplinary or corrective measures, including discharge, will be taken for violations thereof.

The enforcement of this policy for subsidiaries is the responsibility of subsidiary Presidents or subsidiary division General Managers.

SCHURZ COMMUNICATIONS, INC.

CONFLICTS OF INTEREST POLICY

STATEMENT OF COMPLIANCE

SECTION: XII. CONFLICTS OF INTEREST

PAGE: 2

1. Have you read the corporation's conflicts of interest policy within the past 12 months, and do you understand that policy? Circle one: YES or NO
2. Have you at any time within last 12 months been in violation of the conflict of interest policy? Circle one: YES or NO
3. If your answer to question 2 above is "yes", please give full details below:

Date: 4/2/12

Signature: 

Position: Reporter / Multi Media Journalist

An Acknowledgment of Personal Responsibility as a Media-Related Occupation Employee

I, Vester Flansburg, an employee of WDBJ-
hereby acknowledge and understand that my job is categorized by Nielsen Media Research, Inc.
as "**Media-Related Employment**" status.

It is my understanding that Nielsen Media Research, Inc.'s audience information is the currency used to assist in the buying and selling of television time (advertising). It is also my understanding that the audience estimates (ratings) that Nielsen Media Research produces in the marketplace greatly contribute to the financial investment that an advertiser places with a television station. I also understand that Nielsen Media Research, Inc.'s information is also used to increase the effectiveness of television advertising and television programming.

I understand that, for these reasons, it is critical that the audience estimates must be free from any bias, or conduct by a station or its employees that may cast suspicion upon the integrity of the television viewing reported to Nielsen Media Research.

Because of my **Media-Related Employment**, I hereby agree to abide to the following guidelines:

1. *If I, or a member of the household in which I reside* is contacted by Nielsen Media Research, Inc. to participate in any type of Nielsen Media Research, Inc. related television survey, the caller will immediately be notified that the household is prohibited from participating in the survey, due to my media-related occupation.
2. In the event that a television diary or other related materials are mailed to the household, the household agrees not to participate in the survey. I agree to dispose of any materials sent to me by Nielsen Media Research, Inc. I also agree not to forward the materials to another household for them to fill out and participate.
3. In the event that I, or a member of the household, am contacted to participate in a Nielsen Media Research, Inc. meter panel that electronically collects television household viewing, I agree that my household will not participate.
4. I agree to *immediately* notify my department head and/or station manager as to any survey solicitation, or anyone residing in my household, if contacted by Nielsen Media Research, Inc.

Accepted and agreed to on this 2 day of April in the year 2012.

[Signature]
Employee

[Signature]
Employer

TO: Bryce Williams
FROM: Dan Dennison
RE: Behavior and Professionalism
CC: Dave Seidel, Personnel File
DATE: May 31, 2012

Bryce, we appreciate the time you took today to discuss the issues of concern noted in this memo. On three separate occasions in the past month and a half you have behaved in a manner that has resulted in one or more of your co-workers feeling threatened or uncomfortable. In each of these instances your co-workers describe your behavior as unprofessional and not keeping with the standards of professionalism we expect from all employees.

On Saturday, April 28, 2012, you admit to your role in a heated confrontation with another reporter inside a station live truck, observed by two photographers, in which you lost your temper and used verbal and body language that left co-workers feeling both threatened and extremely uncomfortable.

On Thursday, May 24, 2012, your photographer reports you insisted on shooting an interview as a two shot, despite the photographer's insistence that he was not comfortable shooting the interview in this manner. You interrupted the interview three times to make sure the photographer was framing the shot as you wished. The photographer reports that doing this in front of the interview subject made both he and the interviewee feel uncomfortable. He felt your reasoning and approach to this interview was unprofessional and made the station look bad in front of others.

On Monday, May 30, 2012 while shooting a story on Roanoke's Festival in the Park with a photographer you insisted, again in front of an interview subject, that the photographer shoot off the tripod when he elected to shoot some b-roll off the shoulder. After the photographer finished shooting you said something to the effect: "I'm not trying to be an asshole, but the shaky video isn't going to work." You then are quoted as saying to the interview subject, "I'm sorry sir, the footage he just shot is completely unusable; I'm sorry, we're going to have to try and come back later or something." After leaving this setting the photographer says you continued to argue with him about the quality of the video, even after the photographer told you, you hadn't seen it and should not assume it is shaky. The photographer says after some back and forth you stormed off in anger.

Bryce, you are a recognizable representative of WDBJ7, and any disputes or disagreements with co-workers should be handled with respect and always in a private setting. We want you to work on the tone of your interpersonal relationships and exercise great care in dealing with stressful situations or disagreements and your response to them. You need to always work as a member of a collaborative team and allow your teammates to do their jobs and not assume that you alone, are concerned about high quality standards. If you have concerns or issues with the work performance of a co-worker you should bring these concerns in private to your direct supervisor or a member of the management team. We encouraged you today to focus closely on your own work product and contributions.

We are all committed to your success and professional growth and if you feel assistance from the Schurz Communications Employee Assistance Program would be beneficial please let us know and we'll get the contact information to you.

Ultimately, remedying the rift with individual co-workers caused by your behavior is up to you and will take constant and conscious effort. Any further incidents of inappropriate behavior or situational response that is not professional or leaves a co-worker feeling threatened or uncomfortable will lead to more serious disciplinary action up to and including termination of employment.

TO: Bryce Williams
FROM: Dan Dennison
RE: Behavioral Improvement and Expectations
DATE: July 30, 2012
CC: Dave Seidel, Personnel File

Bryce,

There is no doubt in my mind that you want to do well at WDBJ7 and have an overarching desire to please. However your behaviors continue to cause a great deal of friction with your co-workers, particularly your photographer teammates. You must make improvements immediately or you will face termination of employment.

I met with you, Rob Chewning, Trevor Fair, Lynn Eller, Dave Seidel and Greg Baldwin on July 26, 2012, to determine the circumstances of recent conflicts you've had. On July 23rd, Rob Chewning indicates you got very angry as he tried to push the microphone into proper position during an interview. On July 21st you had a conflict with Trevor Fair regarding the completion of editing of your package for the 6 p.m. news. Management is not taking sides, but as I said to you in this meeting, you have been the common denominator in these and other incidents outlined previously. Based on earlier conflicts noted in a previous write-up on May 31, 2012, and on the recent incidents we discussed, it seems that you are taking the actions of many of the photographers quite personally and misinterpreting their actions or words.

We enjoy a very talented staff of photographers and on a story they are equal members of the team and have the responsibility for producing excellent quality video and audio. Sometimes technical issues, changing light conditions, the need to reset an interview subject, and audio problems cause a photographer to stop an interview or shoot and readjust. Photographers are responsible for both video and audio and unless you are shooting a story on your own you should let them do their work unfettered. This does not mean you cannot or should not suggest settings or techniques which will add to the overall story telling. Under no circumstances should you engage in harsh language, demonstrate aggressive body language, or lash out at a photographer in front of members of the public. If interpersonal relationship difficulties arise you should bring this to the attention of your direct supervisor or a member of the news management team in private.

Clearly much damage has been done already in your working relationships with several members of the photography staff. It is your responsibility, going forward, to work at repairing these relationships, as the station cannot be put in the position of making assignments based on the inability of team members to get along. In this regard, you are required to contact Health Advocate, the employee assistance program (EAP) at 1-877-919-9355, option #2, by Friday, August 3, 2012. This is a mandatory referral requiring your compliance. Failure to comply will result in termination of employment.

While WDBJ7 has a zero-tolerance policy toward the use of discriminatory language and actions, this policy also extends to belittling fellow employees by calling into question their upbringing and other personal characteristics. If you hear discriminatory language or observe any actions in this regard, bring it to my attention immediately.

Bryce, our desire is for you and all of our employees to achieve great success. You have stated that you've received more coaching and performance feedback in 90 days here than you received in the entirety of your employment at other television stations. We will continue assisting you with your professional growth and development, but we can no longer afford to have you engage in behaviors that constitute creation of a hostile work environment. Your total focus should be on becoming the best reporter and multi-media journalist you can be. We will meet again on August 23, 2012 at 10 a.m. to talk about your progress.



Performance Review

Emp Name: Bryce Williams
Position: Reporter
Department: News
Reviewed by: David Seidel
Review Date: 8/6/2012
Review Type: 90 Day

EXPLANATION of GRADING SYSTEM:

- 5- Greatly Exceeds Expectations – Employee displays obvious and consistent excellence in a performance area.
- 4- Exceeds Expectations – Employee performs at a level above expectations for the position.
- 3- Meets Expectations – Employee consistently meets the expectations for the position.
- 2- Has an Opportunity for Improvement – Employee does not consistently meet expectations and needs improvement.
- 1- Unacceptable – Employee performance falls well below expectations and must be corrected.

Specific Job Description Duties

RATING

3
1
3
2

Description: Delivers news stories in an understandable manner

Bryce's story organization and focus have improved and can get better. Bryce still has trouble at times turning the story pitch into completed product. Sometimes the story is lean on facts, though not on sound. Other times the story is lean on video. Part of this issue relates to producing locally-generated beat story pitches. A "national" story that looks good on paper, or on the internet, often does not work as well on television.

Description: Works together with photographer, producer and assignment editor

Bryce communicates with the assignment desk and has worked to improve his scripting with producers. The area where Bryce must make immediate improvement is with photographers. This issue is well-documented and has been discussed.

Description: Responsible for covering beat and enterprising stories

Bryce is working hard to make new connections in his geographic beat (Franklin County/SML). His topical beat (religion) fits well with his schedule and he has taken advantage of that. Hopefully, these beats will generate more story pitches, so localizing national stories will become less of an occurrence.

Description: Contributing to the web

Bryce needs to incorporate web posting into his daily schedule. Too often, stories are posted well after they air at 6:00. While earlier posting can be a challenge when operating as a "multi media journalist" on Sat/Sun, the effort must be made whenever possible and particularly on breaking/hard news stories. Half the story now is better than the whole story at 6:15 p.m. Photos from the field are also necessary.

Description

Assessment

Description

Assessment

General Performance Factors

Rating	
1	CUSTOMER SERVICE
3	Internal: Treats station employees with respect in a friendly, helpful way. Responds promptly and accurately to needs and requests.
3	Respectful to coworkers at all times
3	Shares ideas with team members
3	Offers to train others on job duties
	Willing to work with others to meet company objectives
2	External: Treats external customers with respect in a friendly, helpful way. Responds promptly and accurately to needs and requests.
3	Respectful to clients/members of the community
3	Positive station representative
2	Shares contacts made in the community with appropriate station staff
3	Follows through promptly and accurately, delivers on promises
	Dresses, grooms and carries himself/herself in a way that represents the company well
3	JOB KNOWLEDGE
3	Has good knowledge of job requirements
	Stays familiar with industry and competitive information
	QUALITY OF WORK - Neatness, accuracy, thoroughness and general effectiveness of work produced.
3	Neatness
3	Accuracy
2	Thoroughness
3	Works independently with minimal direction
3	QUANTITY OF WORK - Pace and Productivity
4	Works quickly, especially under pressure
3	Stays at the job, is diligent about work
	Has a high output of work product
4	DEPENDABILITY - Degree of reliability, follow through and punctuality on the job. Ability and willingness to carry out instructions and fulfill responsibilities.
4	Attendance - minimal amount of time away from work
3	Punctuality - arrives to work/meetings on time
3	Meets deadlines
3	Flexible and adaptable
3	Willing to accept supervision/direction
3	Accepts responsibility for work assignments and for general success of the company
3	INITIATIVE - Active involvement in job beyond specific assigned responsibilities; ability to go beyond established procedures to find workable new approaches.
3	Finds new approaches
3	Solves problems independently
2	Volunteers for internal committees
3	Self-motivated
4	Enthusiastic
3	Ability to remain positive
2.9	Average of all general performance factor ratings

Goals/Progress from Last Review

% Completed	
100	Master all INews scripting procedures
90	Proficiently shoot and edit packages on a regular/daily basis
50	Master posting of web stories and proficiently post photo galleries

Specific Objectives/Goals for Upcoming Period:

Completion Date	Specific Goal
immediate	Pitch at least 3 geographic beat stories and 1 topical beat stories for week
immediate	Pitch and incorporate at least 1 compelling live element per week
12/31/2012	Complete required Lynda.com training

Additional Comments (Optional)

Supervisor:

Bryce has made significant progress on the technical aspects of the position. His shooting has and continues to improve and he can now edit vsvs and pkgs. He can now focus on story development, sources and storytelling. The key word for the next 9 months is focus.

Employee:

This Employee Performance Evaluation is the property of WDBJ Television and for its confidential use only. My signature acknowledges I have been given the opportunity to review this evaluation and that it has been discussed with me. Employee may be given a copy of this review at the time of the review.

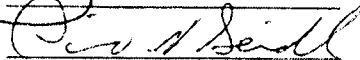
Employee Signature



Date

9/6/12

Supervisor



Date

8/6/12

General Manager

Date

To: Bryce Williams
From: Dan Dennison
Re: Political Activities Standards
Date: Nov. 9, 2012
CC: David Seidel, personnel file

It's come to our attention that while standing in line on Tuesday, preparing to vote, you were wearing a President Obama sticker on your clothing. Bryce, this is a clear violation, not only of Schurz Co., policy but of standard journalistic ethics. Journalists and particularly reporters who appear on television must abide by a different standard. Please refer to section 5-12 in the Schurz employee handbook, "News employees must refrain from participating in active partisan politics, which includes: active support of candidates for public office, including monetary support..." I encourage you to read and understand the complete company policy on community and political activities found at the aforementioned location in your employee handbook. This demonstrated a basic lack of understanding of your role as an on-air journalist at the television station and poor judgment.

While this is the first incident of this nature, and we trust the last, you need to quickly and diligently move from the category of an employee who commits misstep after misstep to the kind of problem-free employee we hope you can become. Your disciplinary actions and performance deficits are well documented. While the management team is committed to helping you improve your daily work product and to your overall success, we are fast reaching the point where continued violations of company policy or basic journalistic standards could mean termination from employment at WDBJ7.



Bryce

Dan Dennison <ddennison@schurz.com>

Mon, Dec 24, 2012 at 3:24 PM

To: Monica Taylor <mtaylor@wdbj7.com>, David Seidel <DSEIDEL@wdbj7.com>

I had two lengthy conversations with Bryce today. While I tried to be supportive and encouraging, I'm not entirely sure where his head is at. When I sent a Google calendar invite to review consultant coaching notes with him after the New Year, he responded by saying, "I may need to speak with you, Jeff or Todd Schurz before the coaching session." He also said repeatedly, "maybe it's time for me to go." I told him that that his is decision and we are willing to give this one last try, but it is really up to him to produce consistently solid work over the next few weeks. In any case the final write-up that I presented him is attached and it accurately reflects our conversation.

--

Dan Dennison

News Director

WDBJ Television, Inc.

2807 Hershberger Road NW

Roanoke, VA 24017

540-344-7000

www.wdbj7.com



Bryce Williams Memo 12-21-12.docx

16K

To: Bryce Williams
From: Dan Dennison
Re: Performance
Date: Dec. 24, 2012
CC: Dave Seidel, personnel file

I appreciate the time you took and the candor you expressed in our meeting this morning. As I said, we continue to have serious concerns about your news gathering, time management skills, and on-air performance. Over the past nine months, Dave Seidel, Greg Baldwin and I have spent a great deal of time and effort attempting to coach you to higher levels of performance, but recently in spite of this, you seem to have reached a plateau. I want to cite a couple of recent examples of lack of thorough reporting, poor on-air performance, or time management issues.

1. You did a news release story about a woman who was purported to be the first female auto body shop owner in Roanoke. Instead of doing some original reporting you took the news release and its authors at face value. Your job as a reporter is to dig for the truth and the facts. You have a tendency to repeat instead of report on many stories which leads to thinly sourced material and a lack of substance in your final work.
2. Last weekend you did a story about one church which was responding to the tragedy in Newtown. It was fine to focus on one church, but you used this opportunity to promote this church's desire to seek new members by providing its e-mail and telephone contacts. Imagine all of the other churches in our region who would love to have the #1 television news organization provide this kind of gratuitous coverage and promotion. Again your tendency is to repeat, rather than do original reporting and use critical thinking and questioning skills to produce truly memorable television stories. As you know the expectation has been that you be live in the field unless there is a very good reason not to. This story was presented in the studio. You often state the obvious: "people are saddened and concerned." Of course they are. This story was disjointed, had no real focus, had abrupt audio transitions and had the subject material to be interesting and memorable. Instead it was predictable and pedestrian.
3. Two weeks ago you received clear instructions to cover Gov. McDonnell's comments on gun control in a 5 p.m. live report from Franklin County. Instead, the third story in our broadcast was a feature, 'Chamber of Commerce' style promotion for a local creamery. You used words like "excited," which again suggests you were not acting as a reporter but as a voice for the promoters of the event or owners of the business (repeater not reporter). Since you did not follow clear instructions that one news manager delivered and two others witnessed; this story ended up being misplaced and to the viewer it was an odd moment on television. How do we go from talking about the terrible tragedy in Newtown to shilling for a local business, and then back to the tragedy? Granted you did accept full responsibility for this, but there have been far too many instances where management believes you are listening and comprehending directions or instructions, to ultimately see something entirely different on the air.
4. You recently did another story in which your live introduction was followed by a two shot of you walking with the interview subject. This is clearly a jump cut. When our chief photographer attempted to speak to you about this, he reports you were curt and defensive and said it was the editor's issue. Bryce, only your name is on your stories and you are ultimately the producer of your work and in the audience's eyes the only person involved. This is not to suggest you should not work closely with your teammates, but indicates that you do not take full responsibility for every frame of video and every word written in one of your stories. In this same story you staged a walking question, evidenced by a countdown. This appeared to be

staged on the air and not to suggest you should not doing walking interviews but avoid blatant staging like this. We're told the photographer expressed some concern about this. There are indications that someone has instructed you to interject yourself in every story. Your story should be about people, places, and events and while it is important to show reporters engaged in doing their jobs it should not be a primary factor in how you produce material.

5. Your on-air performance, as again pointed out by the station consultant last week continues to be stiff and nervous. You hold onto scripts with both hands; even when you have a TelePrompter in the studio and never refer to them. This is an unnecessary crutch. Given your level of experience doing live television, our expectation is that your on-air performance should be better at this point in time.

These issues combined with other well documented and discussed issues in recent months have led us to a serious juncture. We need to see immediate and sustained improvement in the following areas:

- A. News gathering and avoiding being merely a human tape recorder
- B. On-air performance
- C. Story production with the concept that you are ultimately responsible for everything that happens under your name
- D. Time management-organizing your day to ensure that you have ample time each day to do solid original reporting, clear-concise writing, checking and double-checking of facts and information, and time to prepare for live shots
- E. Listening skills-it's one thing to act like your listening and quite another to not follow through on what you've heard

If there has not been sustained, demonstrable progress in the next two weeks in all areas of concern noted in this memo, it will lead to more serious disciplinary action up to and including termination from employment. We will plan to meet with you on January 10, 2013 at 8:30 a.m. to discuss your progress. Remember your quote always,

"We need them to need us!"

Meeting with Bryce Williams on 01/14

Present: Dan Dennison, Dave Seidel, Greg Baldwin, Monica Taylor, Bryce Williams.

Dan began the meeting. He asked Bryce about an incident reported by photographer Trevor Fair. The report suggested Bryce had tried to enter a home without permission while seeking out an interview subject. Bryce responded that he felt like he was being thrown under the bus. When questioned, Bryce said the structure in question was not a residence. It was more akin to a farm building and that he had been looking around for the property owner. Bryce also noted that he and Trevor had conducted personal conversations on their way to or from stories. Bryce said these may have been inappropriate in terms of content. Dan explained there was a great difference between Trevor's story and Bryce's and that it was difficult to figure out where the exact reality was.

Dan explained that in his last meeting with Bryce they discussed various performance issues that needed to be addressed within the next 2-3 weeks. Dan said it was the collective opinion of the three department managers that Bryce had made progress and that we will proceed with employment and coaching.

Dan asked me and Greg to offer our perspective. I noted that we felt like Bryce's performance in the last 2-3 weeks had improved. I stated that whatever focus, energy, or effort he put into his work for the last 2-3 weeks should continue. I reinforced that he should continue to work his assigned beats, to avoid writing to hyperbole and to continue working on the comfort of his liveshots. I noted that he appeared more relaxed and conversational in field liveshots and that he must address the in-studio liveshots to equalize the performance.

I do not recall Greg's individual comments.

The meeting returned to Dan who noted that in a previous discussion Bryce had suggested that he did not want to work with Dan on script review and other coaching. Dan made it clear that he was the news director and had the overall responsibility for all employees in the department. He made it clear that there would be times when he would be reviewing Bryce's script and other performance issues.

The discussion at one point returned Bryce's relationship with photographers. I encouraged Bryce to take their counsel. I suggested that he think of them as one of the first viewers of the story. If they are confused about the story, or an interview, then the viewer is likely to be confused as well. I also suggested Bryce consider script review as another version of an "early viewer." Reporters often get so deeply involved in the background and facts of the story, they can't realize when it becomes confusing or unclear. I also noted that the photographers might be trying to protect not only themselves but also the reporter when a potentially sensitive or dangerous situation arises. They may not all handle it the same way. I encouraged Bryce to give them the benefit of the doubt and to not view it as meddling in a reporter's business.

Dan encouraged Bryce to remain highly focused on his own work.

Greg

January 14 Meeting with Bryce Williams

Dan, Greg, Dave and Monica met with Bryce Williams on Monday, January 14 to address his performance issues.

Before we got into the existing issues Dan brought up a new concern brought up by Trevor Fair. Dan asked Bryce what he remembered about going to a farmer's house in Franklin County. The farmer admitted to shooting a neighbor's dogs. Bryce didn't recall any concerns so Dan specifically asked him about opening the door on the farmer's house or out building. Bryce said he had developed a relationship with the farmer and walked around the building to try to get into the building and he did open the door. Dan explained that Trevor stated the farmer was upset. Bryce said the farmer was not upset. A few days later Bryce told me Trevor told him the farmer called to complain about the incident. Bryce also stated that Trevor said he "got in trouble" over the incident.

We moved out to talk about inconsistencies in Bryce's writing and story focus. Dan, Greg and Dave all agreed Bryce had made improvements but needed to continue showing improvement in his writing and story focus to avoid further disciplinary action. Dan told Bryce he was under a final warning and further incidents could result in him being terminated.

Dave S

Weekend meetings on 01/21

First meeting

Present: Dave Seidel, Bryce Williams

I asked Bryce to speak to me about an issue that had come up over the weekend. Another reporter had suggested that the weekend staff needed to shift onto another story, instead of what was suggested on our Friday weekend planning note. Dan Dennison, who was the on-call manager, agreed and told the weekend staff to make appropriate changes on Sunday.

I told Bryce this discussion was not about who was right and who was wrong. I noted that both Bryce and the reporter had made valid arguments to defend their case. In an ideal world, I said we should cover both stories.

I explained that what we really need to focus all of the weekend staff on was being flexible when new stories arise and communicating with each other. I encouraged Bryce to consider my planning message as a guideline. In the military, plans are only perfect until the first shots are fired, I noted. Bryce and I discussed his interaction and communication with producers through his workday. He said he clearly discusses and communicates his plan with the morning producer and then checks in again with the evening producer when she comes on shift. Bryce felt like it was sufficient.

I reinforced that none of us will make the perfect decision 100% of the time. But discussion of the options with a larger group of people (reporters, anchors, producers, etc) will usually yield a better result.

Second Meeting

Present: Dan Dennison, Bryce Williams, Dave Seidel, Greg Baldwin, Melanie Crabtree

Dan called the meeting to discuss newsgathering and communications on the weekends. Dan wanted to make it clear that the weekend crews should be flexible to developing stories and should be seeking out news, not waiting for it to arrive via email or phone call. I reinforced that the planner I send out usually looks good on paper on Friday but it can and should be adjusted as the days go on.

Bryce and Melanie both stated that they felt like they were appropriately and effectively communicating. Melanie also noted that she felt like she was receiving effective and appropriate communication from the morning producer.

Greg Baldwin conversation with Bryce Williams

Monday, January 21

Bryce came back to the newsroom after his 6 p.m. live shot and was upset because the live shot was killed. We had a technical problem with the audio. I thought this was an opportunity to do some coaching with Bryce. The conversation started with Bryce venting his frustration because the live shot had to be killed. I explained to him that sometimes there are technical issues beyond our control. I also asked if he could remember the last time he had a live shot killed. He said he couldn't remember, which was the point I was trying to get across – the fact he has had very few failed live shots.

Bryce then told me he had met with Monica Taylor about his concerns about possible discrimination. I asked Bryce to give me specifics. He talked about two incidents with a former intern Alison Bailey. He said Zach Irby, also an intern at the time, was present when Alison made a couple of statements that he thought were racist. One was something about "swinging" by some place; the other was out in the "field". Bryce also said he felt he was working in a hostile work environment because of an incident that happened with Trevor Fair. That incident was mentioned in my notes from a January 14 meeting. Bryce said that Trevor lied about the incident. Bryce said that Trevor told him a man from Franklin County called to complain about Bryce trespassing. Bryce said that was a lie. Bryce said the man did not call per Dan Dennison. I told Bryce if he felt threatened in any way he needed to report the incident immediately. My exact words were you can't present 88 pages of claims, months after you encounter an incident that you think is racist or threatening. Bryce said he agreed.

Bryce went on to say he wanted to focus on producing high quality work for the station and be a team player. He said quote "I want to put a period on the end of the sentence; I want this to be over." I said if that is how you really feel actions speak louder than words and you need to prove that is what you want to happen.

Greg and Bryce Phone Conversation

Saturday, January 26

I called Bryce around noon to find out what his story was for the day. He told me he was doing a story about businesses losing sales because of the snow. I told him my first concern was that the snow would be old news by 6 p.m. I also told him that we did a very similar story on Friday at 6 p.m.

Bryce said he called Orlando Saturday morning to discuss the story idea. He said Orlando thought it was a great idea, gave him several pointers including shot suggestions and material to include in the story. Again I told Bryce I was concerned that a snow story was old news because the snow was gone. Bryce then asked me if I was questioning the news judgment of someone who worked several years for Fox Network(Orlando). I told Bryce he could get coaching from Orlando on performance, presentation and delivery anytime but he needed to talk to the newsroom manager about his content. He said "So I can call you at 8 on Saturday or Sunday morning?" I said you can call me anytime and I am sure the other newsroom managers feel the same way but I will ask them to make sure. He then proceeded to be argumentative and say that he could not please the newsroom managers. He said we do not like anything he does. I told him that was not true and told him how Dave, Dan and I have all complimented him on recent stories. I also told him his 5 p.m. live shot on Friday (the day before) was very good. I told him I was not going to be responsible for the snow story. He said he would make the lead in fresh and add some meat to the story. I said if you can do that the story will work. When I watched the package I felt it was very disjointed. The anchor lead, Bryce's live intro and the package just didn't flow. The viewer had to work to make the connection for this story.

**Fwd: Bryce**

Dan Dennison <ddennison@schurz.com>
To: Monica Taylor <mtaylor@wdbj7.com>

Wed, Jan 30, 2013 at 4:10 PM

In addition to the e-mail below, anchor/reporter Nadia Singh asked to meet with me today. She confirmed and expanded on what Kim wrote. She says she suggested that Bryce change a repeated phrase in one sentence in his story. A while later, right before the 6 p.m. newscast he invited Nadia into the hallway outside the newsroom to "clear the air." Nadia says she couldn't figure out initially what he was driving at and kept making the point that he had as much experience as she does and why is she "approving scripts." Nadia indicated that I'd just sent out an e-mail within the past two weeks further delineating the script review process in the news department to include anchors and producers in the absence of a news manager. Bryce apparently told Nadia, "I'll be checking with Dan on that." She describes this encounter as very confrontational and says Bryce was defensive. She said the exchange left her feeling confused and badly just before the newscast and she did not understand the reason for the conflict.

----- Forwarded message -----

From: **Kim Pinckney** <kpinckney@schurz.com>
Date: Sun, Jan 27, 2013 at 8:31 PM
Subject: Bryce
To: Dan Dennison <ddennison@wdbj7.com>

Hi-

Nadia and I just wanted to make you aware of a situation with Bryce. I approved his pkg tonight. But since I was in a bit of a time crunch, I asked Nadia to read it behind me. She asked him about something in the package, and it didn't sit well with him. He called her out into the hall and they had a discussion about it.

Knowing Nadia's position here and based on the e-mails you've sent out, it's okay for anchors to read over and review scripts and copy.

Bryce does not agree. He told Nadia in the hallway that they have the same experience and he should also be able to review scripts.

As a producer, I believe it can't hurt to have as many eyes review a script before we go on the air. So I don't see what the problem is. Bryce created an uncomfortable situation for her because she was just following the script review instructions that you sent out.

We're sending this e-mail because Bryce threatened to talk to you about this tomorrow.

See you then,

Kim

--

Bryce Williams Termination 02/01

After it had been determined to terminate Bryce, I was instructed to accompany Bryce to Monica Taylor's office. Dan Dennison and Monica were to already be there.

Dan explained that Bryce was being terminated due to unsatisfactory job performance and inability to work as a team member. Bryce asked if this was the last day. Dan said it was. Monica presented a severance letter. Bryce said that was unacceptable and used the term "bull shit." He said "Here's what you're going to give me" and wrote "three months" on the letter. Bryce said "You better call police because I'm going to make a big stink. This is not right." Bryce asked if Todd Schurz knew what was going on and then demanded to speak to him on the phone immediately. Bryce then said he had to go to the bathroom and stormed out of Monica's office and slammed the door. Dan and Monica made the decision to call police.

Dan asked me to shadow Bryce. Bryce did not go to the bathroom. Instead he went to his desk in the newsroom and began taking personal things off his desk and putting them in his bag. I asked Bryce if I could help him. I said "I know this is not a good situation. Let's just not make it any worse." Bryce said he would go but wanted to say goodbye to someone. He then began speaking to Melissa Gaona. While they were speaking I told the staff in the newsroom that the morning editorial meeting would be in the main conference room and told everyone to go that way and start the meeting early. Bryce finished his conversation with Melissa and went back to his desk. He was looking for Todd Schurz's phone number on the corporate website. I told him to write it down and call him from his cellphone from home. Bryce said his cellphone had been acting up and that he needed to make the call. Around this same time, Dan Dennison and two police officers came into the newsroom. They told Bryce that the company wanted him off the property and needed to leave. Bryce refused and continued to keep trying to call from his desk phone. The officer began to take the phone and Bryce said "Take your hands off me. Leave me alone." Some other members of the staff were on the periphery of the newsroom observing and recording video. The officers continued to tell Bryce he needed to leave. Bryce tossed a hat and small wooden cross at Dan and said "You need this." He told one of the officers "You know what they did? They had a watermelon back there for a week and basically called me a n-----." Dan instructed any remaining employees to leave the newsroom. Dan and I also went to the periphery of the newsroom and allowed the officers to remove Bryce from the building.

Dan D.

Record of Events-Feb. 1, 2013

Meeting in Monica Taylor's office, Dave Seidel escorted Bryce in for a termination meeting. I reminded Bryce that on Dec. 24, 2012 he'd suggested that WDBJ7 may not be the right fit for him. I told him that after analyzing his performance over the past month we have come to the same conclusion and he was being terminated from employment. He asked if it was immediate and I said yes it was. Monica then presented him with his separation agreement which she explained would provide two weeks of severance pay and earned PTO. He became agitated instantaneously and said he would need at least three months of severance. He repeated (as he said the same thing on 12-24), his feeling that firing him would lead to negative consequences for me personally and for the station. He indicated he'd recorded our previous conversations and pulled up what appeared to be a small felt bag from his lap, but did not produce a recording device. I told Bryce he could clean out his desk now or we'd make arrangements to do it tomorrow, when fewer people are in the newsroom. I honestly don't know if I was able to finish this point, when Bryce said he had to go to the bathroom, stood up abruptly, stormed out of the room, and slammed the door. This caused members of the sales team to take shelter in a locked office.

Monica immediately called 911 and we waited at the front desk for the police to arrive. We asked Dave Seidel to escort him to the newsroom and supervise the gathering of his personal belongings. I learned later that Bryce asked Dave if he could say goodbye to Melissa Gaona. Dave agreed and Melissa reports meeting him in the hallway outside of the newsroom. Melissa reports Bryce was very upset and agitated and she tried to get him to calm down.

When two Roanoke Police Officers arrived, Bryce had gone back into the newsroom. When we got there he had just gotten off the phone with a friend or family member. Right before this he called the front desk seeking Todd Schurz' phone number. The officers instructed Bryce not to make any further phone calls and he needed to leave the premises immediately. Bryce continued dialing Todd's assistant and obviously got through to her and said the following: "This is Bryce Williams at WDBJ in Roanoke and I have an emergency and need to speak with Todd immediately."

I believe the officers again asked him to end his call and allow them to escort him from the newsroom. He told the officers about a watermelon that was sitting in the hallway and that was akin to someone calling him a n-----. When the officers again tried to calm him down and tried to physically lift him from his chair he said, "Don't touch me, you're hurting my shoulder." The officers managed to get Bryce to his feet at which time he picked up a ball cap and threw it at me. One of the officers immediately asked if I wanted to press assault charges and I responded, "Not at the moment." Bryce then turned his attention to Lynn Eller who was standing in the hallway and said he "was a big fat....." and flipped him off. This was being recorded by Adam Ward; Bryce turned his attention to him said something about paparazzi, told Adam he needed to "lose your big gut," and again flipped the camera off. To my knowledge, in addition to the police officers, this episode was witnessed by Dave Seidel, Lynn Eller, Adam Ward, Alan Novitsky, Sam Doyle and Leo Hirsbrunner. As he was being escorted from the newsroom Bryce handed me a small wooden cross that was on his desk and said, "You'll need this." He was then escorted out of the building. In addition to the first two officers who responded, two others responded to the front of the building and talked with Bryce and Monica for about 5 minutes before he ultimately left the premises.

In the afternoon, after receiving an e-mail from Bryce's agent, John Dorr of the Lorne Dorne Agency and after consulting with Jeff Marks and Monica Taylor, Monica and I called Mr. Dorr. He inquired as to whether Bryce's termination was the result of performance or personality conflicts. Bryce had apparently shared some information with his agent about his previous conflicts with photographers in particular. Mr. Dorr said he would like to know in an effort to decide whether he should continue

representing Bryce. I told him that Bryce did not meet our performance expectations and asked if Bryce had shared any of what happened today with him? Mr. Dorr said Bryce had simply told him he'd been terminated. I then told Mr. Dorr that Bryce was escorted out of the television station by law enforcement. At this point Mr. Dorr indicated he would no longer represent Bryce.

All employees were informed that Mr. Williams was no longer an employee of the television station and that anyone seeing him on company property should call 911 immediately. Additionally I informed all news and operations department employees working over the weekend that an off-duty police officer would be on our premises from 6 a.m. to 12 midnight on both Saturday and Sunday.

TO: File

FROM: Monica Taylor

RE: Bryce Williams termination

DATE: February 1, 2013

Dan Dennison and Dave Seidel met in my office to conduct Bryce Williams' termination. Dan reminded Bryce that during their December 24, 2012 meeting, Bryce asked about a severance package if things didn't work out. Dan told Bryce that we're at that point and it isn't working out and we are going to end his employment. Bryce said, "so that's it? Is today my last day?" Dan said yes and told him I would explain the severance agreement.

I started to explain the severance package and Bryce became upset. He said, "two weeks is not enough, I have to find another job." Bryce asked if Jeff knew about this and if Todd Schurz knew about it. We told him that Jeff was aware. Again he asked if Todd knew. We said no and Bryce demanded that we get Todd on the phone.

Bryce raised his voice and said, "you're not doing this to me and I'm going to tell you what I want." He took the agreement and said, "I want three months and you're going to give it to me!" He wrote three months on the agreement. Bryce told Dan that he had him on tape. Bryce pushed away from the table and said, "I'm not leaving, you're going to have to call the f####ing police. Call the police, I'm not leaving. I'm going to make a stink and it's going to be in the headlines." Bryce said he was pissed and was going to the bathroom and would be back. He slammed the door and left my office.

Dave followed him to the bathroom and I called 911. Dave was with Bryce to the newsroom as he got his belongings.

I followed the police officers as they escorted Bryce from the newsroom. I was speaking with the officers in front of the building and Bryce drove up and asked for the agreement because he was going to the unemployment office. I returned and gave Bryce the agreement.

**TERMINATION/RETIREMENT REQUEST**Tracking Number: 02/01/13-03 Paygroup: xhk
Date Submitted: 02/04/13 Date Received: / /

EMPLOYEE NAME

Vester Flanagan

TERM DATE

02/01/2013

TERMINATION/RETIREMENTREASON termination - job performanceELIGIBLE FOR REHIRE? ☐ YES ☒ NOVOLUNTARY? ☐ YES ☒ NOSEVERANCE? ☒ YES (attach agreement) ☐ NODID DEPARTING EMPLOYEE HAVE EMPLOYEES REPORTING TO THEM? ☐ YES ☒ NO

IF YES, WHO WILL THESE EMPLOYEES REPORT TO NOW? _____

(if position is not yet filled, please list the job title that these employees report to)

CORPORATE WIDE SYSTEM ACCESS REMOVAL

Please list any corporate wide systems this employee had access to (i.e. Manager level access in TimeSaver, ADP Enterprise, AP Portal, etc.)
Access will be removed as of the term date. Employee level TimeSaver access will be automatically disabled for all terminating employees.

PTO PAYOUT – TO BE DETERMINED BY SSC**COMPANY SPECIFIC/EXPLANATIONS/OTHER DETAILS****APPROVALS**

REQUESTED BY:

APPROVAL 1:

Signature

Signature

Title

Title

Date

Date

APPROVAL 2:

Signature

Title

Date

FOR SUBSIDIARY USE ONLY. INFORMATION IN THIS AREA WILL NOT BE PROCESSED BY SHARED SERVICES.

XHK - WDBJ
2807 Hershberger Rd
Roanoke, Virginia 24017
Time Card Report for 03/01/2012 To 02/02/2013 - Hours Worked
By Home Department - Last Name
29 - XHK - WDBJ

Day	Date	Dept - Posn	PayCode-Description		In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site
085 - News														
Employee: 290007615 - Flanagan, Vester L														
Sun	05/13/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	05/13/2012	085-1063	0130p	0800p					6.50	0.00	0.00	6.50		XHK
Mon	05/14/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	05/14/2012	085-1063	0130p	1100p					9.50	0.00	0.00	9.50		XHK
Thu	05/17/2012	085-1063	0915a	0645p					9.50	0.00	0.00	9.50		XHK
Fri	05/18/2012	085-1063	0915a	1230p					3.25	0.00	0.00	3.25		XHK
	05/18/2012	085-1063	0100p	0730p					3.25	3.25	0.00	6.50		XHK
Sat	05/19/2012	085-1063	0830a	0100p					0.00	4.50	0.00	4.50		XHK
	05/19/2012	085-1063	0130p	0715p					0.00	5.75	0.00	5.75		XHK
Sun	05/20/2012	085-1063	0915a	1200p					2.75	0.00	0.00	2.75		XHK
	05/20/2012	085-1063	0100p	0800p					7.00	0.00	0.00	7.00		XHK
Mon	05/21/2012	085-1063	0915a	0500p					7.75	0.00	0.00	7.75		XHK
Thu	05/24/2012	085-1063	0815a	0600p					9.75	0.00	0.00	9.75		XHK
Fri	05/25/2012	085-1063	0900a	1200p					3.00	0.00	0.00	3.00		XHK
	05/25/2012	085-1063	1245p	0700p					6.25	0.00	0.00	6.25		XHK
Sun	05/27/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	05/27/2012	085-1063	0200p	0730p					5.50	0.00	0.00	5.50		XHK
Mon	05/28/2012	085-1063	REG - Regular Hours						-4.00	0.00	0.00			XHK
	05/28/2012	085-1063	HW - Holiday Worked						8.50	0.00	0.00			XHK
	05/28/2012	085-1063	REG - Regular Hours						-4.50	0.00	0.00			XHK
	05/28/2012	085-1063	H - Holiday						8.00	0.00	0.00			XHK
	05/28/2012	085-1063	0215p	0615p					4.00	0.00	0.00	4.00		XHK
	05/28/2012	085-1063	0700p	1130p					4.50	0.00	0.00	4.50		XHK
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	05/29/2012	085-1063	0100p	0700p					6.00	0.00	0.00	6.00		XHK
Thu	05/31/2012	085-1063	0900a	0700p					10.00	0.00	0.00	10.00		XHK
Fri	06/01/2012	085-1063	0900a	0100p					3.00	1.00	0.00	4.00		XHK
	06/01/2012	085-1063	0200p	0700p					0.00	5.00	0.00	5.00		XHK
Sat	06/02/2012	085-1063	0830a	0730p					0.00	11.00	0.00	11.00		XHK
Sun	06/03/2012	085-1063	0730a	1130a					4.00	0.00	0.00	4.00		XHK
	06/03/2012	085-1063	1230p	0700p					6.50	0.00	0.00	6.50		XHK
Mon	06/04/2012	085-1063	0900a	0700p					10.00	0.00	0.00	10.00		XHK
Thu	06/07/2012	085-1063	0900a	0830p					11.50	0.00	0.00	11.50		XHK
Fri	06/08/2012	085-1063	0745a	0630p					8.00	2.75	0.00	10.75		XHK
Sat	06/09/2012	085-1063	0900a	0700p					0.00	10.00	0.00	10.00		XHK
Sun	06/10/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	06/10/2012	085-1063	0200p	0715p					5.25	0.00	0.00	5.25		XHK
Mon	06/11/2012	085-1063	0905a	0105p					4.00	0.00	0.00	4.00		XHK
	06/11/2012	085-1063	0205p	0500p					3.00	0.00	0.00	3.00		XHK

XHK - WDBJ
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Day	Date	Dept - Posn	In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount Site
085 - News (cont.)											
Employee: 290007615 - Flanagan, Vester L											
Thu	06/14/2012	085-1063	0900a	0645p			9.75	0.00	0.00	9.75	XHK
Fri	06/15/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	06/15/2012	085-1063	0130p	0630p			5.00	0.00	0.00	5.00	XHK
Sat	06/16/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
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	06/17/2012	085-1063	1230p	0630p			6.00	0.00	0.00	6.00	XHK
Mon	06/18/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00	XHK
Thu	06/21/2012	085-1063	0900a	0630p			9.50	0.00	0.00	9.50	XHK
Fri	06/22/2012	085-1063	0900a	0630p			9.50	0.00	0.00	9.50	XHK
Sat	06/23/2012	085-1063	0900a	0100p			2.00	2.00	0.00	4.00	XHK
	06/23/2012	085-1063	0200p	0630p			0.00	4.50	0.00	4.50	XHK
Sun	06/24/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	06/24/2012	085-1063	0200p	0700p			5.00	0.00	0.00	5.00	XHK
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	06/25/2012	085-1063	0130p	0700p			5.50	0.00	0.00	5.50	XHK
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	06/29/2012	085-1063	0130p	0700p			5.50	0.00	0.00	5.50	XHK
	06/29/2012	085-1063	1100p	1045a			4.00	7.75	0.00	11.75	XHK
Sun	07/01/2012	085-1063	0900a	0745p			10.75	0.00	0.00	10.75	XHK
Mon	07/02/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00	XHK
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Thu	07/05/2012	085-1063	0910a	0630p			9.25	0.00	0.00	9.25	XHK
Fri	07/06/2012	085-1063	0910a	0110p			4.00	0.00	0.00	4.00	XHK
	07/06/2012	085-1063	0210p	0715p			5.00	0.00	0.00	5.00	XHK
Sat	07/07/2012	085-1063	0815a	1215p			2.00	2.00	0.00	4.00	XHK
	07/07/2012	085-1063	0100p	0630p			0.00	5.50	0.00	5.50	XHK
Sun	07/08/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	07/08/2012	085-1063	0145p	0715p			5.50	0.00	0.00	5.50	XHK
Mon	07/09/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	07/09/2012	085-1063	0130p	0630p			5.00	0.00	0.00	5.00	XHK
Thu	07/12/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	07/12/2012	085-1063	0200p	0600p			4.00	0.00	0.00	4.00	XHK
Fri	07/13/2012	085-1063	0905a	0105p			4.00	0.00	0.00	4.00	XHK
	07/13/2012	085-1063	0150p	0600p			4.25	0.00	0.00	4.25	XHK
Sat	07/14/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00	XHK
	07/14/2012	085-1063	0300p	0600p			1.25	1.75	0.00	3.00	XHK

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			PayCode-Description									
Day	Date	Dept - Posn	In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site
085 - News (cont.)												
Employee: 290007615 - Flanagan, Vester L												
Sun	07/15/2012	085-1063	0900a	0700p			10.00	0.00	0.00	10.00		XHK
Mon	07/16/2012	085-1063	0910a	0600p			8.75	0.00	0.00	8.75		XHK
Thu	07/19/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/19/2012	085-1063	0130p	0530p			4.00	0.00	0.00	4.00		XHK
Fri	07/20/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/20/2012	085-1063	0145p	0600p			4.25	0.00	0.00	4.25		XHK
Sat	07/21/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/21/2012	085-1063	0200p	0600p			1.00	3.00	0.00	4.00		XHK
	07/21/2012	085-1063	0800p	1115p			0.00	3.25	0.00	3.25		XHK
Sun	07/22/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	07/22/2012	085-1063	0245p	0615p			3.50	0.00	0.00	3.50		XHK
Mon	07/23/2012	085-1063	0900a	0700p			10.00	0.00	0.00	10.00		XHK
Thu	07/26/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/26/2012	085-1063	0130p	0600p			4.50	0.00	0.00	4.50		XHK
Fri	07/27/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/27/2012	085-1063	0145p	0630p			4.75	0.00	0.00	4.75		XHK
Sat	07/28/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/28/2012	085-1063	0230p	0615p			1.25	2.50	0.00	3.75		XHK
Sun	07/29/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	07/29/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Mon	07/30/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00		XHK
Thu	08/02/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00		XHK
Fri	08/03/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	08/03/2012	085-1063	0145p	0600p			4.25	0.00	0.00	4.25		XHK
Sat	08/04/2012	085-1063	0800a	1200p			4.00	0.00	0.00	4.00		XHK
	08/04/2012	085-1063	0100p	0630p			1.25	4.25	0.00	5.50		XHK
Sun	08/05/2012	085-1063	0900a	0630p			9.50	0.00	0.00	9.50		XHK
Mon	08/06/2012	085-1063	0900a	0130p			4.50	0.00	0.00	4.50		XHK
	08/06/2012	085-1063	0200p	0600p			4.00	0.00	0.00	4.00		XHK
Thu	08/09/2012	085-1063	0345a	1030a			6.75	0.00	0.00	6.75		XHK
Fri	08/10/2012	085-1063	0330a	1130a			8.00	0.00	0.00	8.00		XHK
Sat	08/11/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	08/11/2012	085-1063	0230p	0630p			3.25	0.75	0.00	4.00		XHK
Sun	08/12/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	08/12/2012	085-1063	0130p	0630p			5.00	0.00	0.00	5.00		XHK
Mon	08/13/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Thu	08/16/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Fri	08/17/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	08/17/2012	085-1063	0130p	0600p			4.50	0.00	0.00	4.50		XHK

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085 - News (cont.)														
Employee: 290007615 - Flanagan, Vester L														
Sat	08/18/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/18/2012	085-1063	0200p	1030p					8.50	0.00	0.00	8.50		XHK
Sun	08/19/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/19/2012	085-1063	0200p	0730p					5.50	0.00	0.00	5.50		XHK
Mon	08/20/2012	085-1063	0900a	0630p					9.50	0.00	0.00	9.50		XHK
Thu	08/23/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/23/2012	085-1063	0130p	0730p					6.00	0.00	0.00	6.00		XHK
Fri	08/24/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/24/2012	085-1063	0130p	0730p					6.00	0.00	0.00	6.00		XHK
Sat	08/25/2012	085-1063	0745a	1145a					1.00	3.00	0.00	4.00		XHK
	08/25/2012	085-1063	1245p	0630p					0.00	5.75	0.00	5.75		XHK
Sun	08/26/2012	085-1063	0830a	1130a					3.00	0.00	0.00	3.00		XHK
	08/26/2012	085-1063	0200p	0630p					4.50	0.00	0.00	4.50		XHK
Mon	08/27/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/27/2012	085-1063	0130p	0600p					4.50	0.00	0.00	4.50		XHK
Wed	08/29/2012	085-1063	0900a	1200p					3.00	0.00	0.00	3.00		XHK
Thu	08/30/2012	085-1063	0900a	0600p					9.00	0.00	0.00	9.00		XHK
Fri	08/31/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	08/31/2012	085-1063	0130p	0630p					5.00	0.00	0.00	5.00		XHK
Sat	09/01/2012	085-1063	0900a	0100p					3.00	1.00	0.00	4.00		XHK
	09/01/2012	085-1063	0200p	0745p					0.00	5.75	0.00	5.75		XHK
Sun	09/02/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	09/02/2012	085-1063	0300p	0630p					3.50	0.00	0.00	3.50		XHK
Mon	09/03/2012	085-1063	H - Holiday						8.00	0.00	0.00			XHK
	09/03/2012	085-1063	REG - Regular Hours						-9.50	0.00	0.00			XHK
	09/03/2012	085-1063	HW - Holiday Worked						9.50	0.00	0.00			XHK
	09/03/2012	085-1063	0230p	1230a					10.00	0.00	0.00	10.00		XHK
Thu	09/06/2012	085-1063	P12 - Paid Time Off 2012						8.00	0.00	0.00			XHK
Fri	09/07/2012	085-1063	P12 - Paid Time Off 2012						8.00	0.00	0.00			XHK
Sat	09/08/2012	085-1063	P12 - Paid Time Off 2012						8.00	0.00	0.00			XHK
Sun	09/09/2012	085-1063	P12 - Paid Time Off 2012						8.00	0.00	0.00			XHK
Mon	09/10/2012	085-1063	P12 - Paid Time Off 2012						8.00	0.00	0.00			XHK
Thu	09/13/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	09/13/2012	085-1063	0145p	0600p					4.25	0.00	0.00	4.25		XHK
Fri	09/14/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	09/14/2012	085-1063	0300p	0630p					3.50	0.00	0.00	3.50		XHK
Sat	09/15/2012	085-1063	0900a	0100p					4.00	0.00	0.00	4.00		XHK
	09/15/2012	085-1063	0230p	0630p					4.00	0.00	0.00	4.00		XHK

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			In	Out								
085 - News (cont.)												
Employee: 290007615 - Flanagan, Vester L												
Sun	09/16/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/16/2012	085-1063	0300p	0700p			4.00	0.00	0.00	4.00		XHK
Mon	09/17/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/17/2012	085-1063	0130p	0645p			5.25	0.00	0.00	5.25		XHK
Thu	09/20/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/20/2012	085-1063	0130p	0630p			5.00	0.00	0.00	5.00		XHK
Fri	09/21/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/21/2012	085-1063	0130p	0700p			5.50	0.00	0.00	5.50		XHK
Sat	09/22/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/22/2012	085-1063	0230p	0700p			0.25	4.25	0.00	4.50		XHK
Sun	09/23/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/23/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Mon	09/24/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/24/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Thu	09/27/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/27/2012	085-1063	0130p	0645p			5.25	0.00	0.00	5.25		XHK
Fri	09/28/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/28/2012	085-1063	0130p	0630p			5.00	0.00	0.00	5.00		XHK
Sat	09/29/2012	085-1063	0745a	1200p			4.25	0.00	0.00	4.25		XHK
	09/29/2012	085-1063	0130p	0630p			0.50	4.50	0.00	5.00		XHK
Sun	09/30/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	09/30/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Mon	10/01/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/01/2012	085-1063	0130p	0600p			4.50	0.00	0.00	4.50		XHK
Wed	10/03/2012	085-1063	0300p	0400p			1.00	0.00	0.00	1.00		XHK
	10/03/2012	085-1063	0405p	0505p			1.00	0.00	0.00	1.00		XHK
Thu	10/04/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/04/2012	085-1063	0200p	1115p			9.25	0.00	0.00	9.25		XHK
Fri	10/05/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/05/2012	085-1063	0130p	0630p			3.75	1.25	0.00	5.00		XHK
Sat	10/06/2012	085-1063	0900a	0100p			0.00	4.00	0.00	4.00		XHK
	10/06/2012	085-1063	0230p	0630p			0.00	4.00	0.00	4.00		XHK
Sun	10/07/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/07/2012	085-1063	0230p	0630p			4.00	0.00	0.00	4.00		XHK
Mon	10/08/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Thu	10/11/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Fri	10/12/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Sat	10/13/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK
Sun	10/14/2012	085-1063	P12 - Paid Time Off 2012				8.00	0.00	0.00			XHK

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Day	Date	Dept - Posn	In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site
085 - News (cont.)												
Employee: 290007615 - Flanagan, Vester L												
Wed	10/17/2012	085-1063	0900a	0530p			8.50	0.00	0.00	8.50		XHK
Thu	10/18/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/18/2012	085-1063	0200p	0600p			4.00	0.00	0.00	4.00		XHK
Fri	10/19/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00		XHK
Sat	10/20/2012	085-1063	1200p	0400p			4.00	0.00	0.00	4.00		XHK
	10/20/2012	085-1063	0500p	0200a			9.00	0.00	0.00	9.00		XHK
Sun	10/21/2012	085-1063	0200p	0900p			7.00	0.00	0.00	7.00		XHK
Mon	10/22/2012	085-1063	0900a	1250p			3.75	0.00	0.00	3.75		XHK
	10/22/2012	085-1063	0220p	0630p			4.25	0.00	0.00	4.25		XHK
Wed	10/24/2012	085-1063	0300p	0345p			0.75	0.00	0.00	0.75		XHK
Thu	10/25/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/25/2012	085-1063	0200p	0545p			3.75	0.00	0.00	3.75		XHK
Fri	10/26/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/26/2012	085-1063	0130p	0645p			5.25	0.00	0.00	5.25		XHK
Sat	10/27/2012	085-1063	0900a	0645p			7.25	2.50	0.00	9.75		XHK
Sun	10/28/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	10/28/2012	085-1063	0200p	0645p			4.75	0.00	0.00	4.75		XHK
Mon	10/29/2012	085-1063	0900a	0110p			4.25	0.00	0.00	4.25		XHK
	10/29/2012	085-1063	0240p	0600p			3.25	0.00	0.00	3.25		XHK
Thu	11/01/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/01/2012	085-1063	0130p	0645p			5.25	0.00	0.00	5.25		XHK
Fri	11/02/2012	085-1063	0915a	1205p			2.75	0.00	0.00	2.75		XHK
	11/02/2012	085-1063	0120p	0600p			4.75	0.00	0.00	4.75		XHK
Sat	11/03/2012	085-1063	0830a	1000a			1.50	0.00	0.00	1.50		XHK
	11/03/2012	085-1063	0230p	1100p			5.50	3.00	0.00	8.50		XHK
Sun	11/04/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/04/2012	085-1063	0300p	0645p			3.75	0.00	0.00	3.75		XHK
Mon	11/05/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/05/2012	085-1063	0130p	0600p			4.50	0.00	0.00	4.50		XHK
Tue	11/06/2012	085-1063	0530a	0800a			2.50	0.00	0.00	2.50		XHK
	11/06/2012	085-1063	0900a	0200p			5.00	0.00	0.00	5.00		XHK
	11/06/2012	085-1063	0330p	0600p			2.50	0.00	0.00	2.50		XHK
Fri	11/09/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/09/2012	085-1063	0200p	0600p			4.00	0.00	0.00	4.00		XHK
Sat	11/10/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/10/2012	085-1063	0200p	0630p			1.75	2.75	0.00	4.50		XHK
Sun	11/11/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/11/2012	085-1063	0230p	0645p			4.25	0.00	0.00	4.25		XHK

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Day	Date	Dept - Posn	In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site
085 - News (cont.)												
Employee: 290007615 - Flanagan, Vester L												
Mon	11/12/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	11/12/2012	085-1063	0245p	0630p			3.75	0.00	0.00	3.75		XHK
Thu	11/15/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	11/15/2012	085-1063	0230p	0600p			3.50	0.00	0.00	3.50		XHK
Fri	11/16/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	11/16/2012	085-1063	0145p	0600p			4.25	0.00	0.00	4.25		XHK
Sat	11/17/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/17/2012	085-1063	0230p	0645p			4.25	0.00	0.00	4.25		XHK
Sun	11/18/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/18/2012	085-1063	0300p	0645p			3.75	0.00	0.00	3.75		XHK
Mon	11/19/2012	085-1063	0900a	0630p			9.50	0.00	0.00	9.50		XHK
Thu	11/22/2012	085-1063	H - Holiday				8.00	0.00	0.00			XHK
	11/22/2012	085-1063	REG - Regular Hours				-3.25	0.00	0.00			XHK
	11/22/2012	085-1063	HW - Holiday Worked				8.00	0.00	0.00			XHK
	11/22/2012	085-1063	REG - Regular Hours				-4.75	0.00	0.00			XHK
	11/22/2012	085-1063	0845a	1200p			3.25	0.00	0.00	3.25		XHK
	11/22/2012	085-1063	0145p	0630p			4.75	0.00	0.00	4.75		XHK
	11/22/2012	085-1063										
Fri	11/23/2012	085-1063	0915a	1200p			2.75	0.00	0.00	2.75		XHK
	11/23/2012	085-1063	0145p	0700p			5.25	0.00	0.00	5.25		XHK
Sat	11/24/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/24/2012	085-1063	0200p	0630p			2.75	1.75	0.00	4.50		XHK
Sun	11/25/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	11/25/2012	085-1063	0215p	0645p			4.50	0.00	0.00	4.50		XHK
Mon	11/26/2012	085-1063	0915a	0100p			3.75	0.00	0.00	3.75		XHK
	11/26/2012	085-1063	0215p	0700p			4.75	0.00	0.00	4.75		XHK
Thu	11/29/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	11/29/2012	085-1063	0145p	0515p			3.50	0.00	0.00	3.50		XHK
Fri	11/30/2012	085-1063	0903a	0103p			4.00	0.00	0.00	4.00		XHK
	11/30/2012	085-1063	0133p	0748p			6.25	0.00	0.00	6.25		XHK
Sat	12/01/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/01/2012	085-1063	0145p	0630p			1.25	3.50	0.00	4.75		XHK
Sun	12/02/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/02/2012	085-1063	0215p	0645p			4.50	0.00	0.00	4.50		XHK
Mon	12/03/2012	085-1063	0730a	0115p			5.75	0.00	0.00	5.75		XHK
	12/03/2012	085-1063	0245p	0530p			2.75	0.00	0.00	2.75		XHK
Thu	12/06/2012	085-1063	0900a	0600p			9.00	0.00	0.00	9.00		XHK
Fri	12/07/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/07/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Sat	12/08/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/08/2012	085-1063	0230p	0700p			1.50	3.00	0.00	4.50		XHK

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By Home Department - Last Name
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Day	Date	Dept - Posn	PayCode-Description		Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site
			In	Out								
085 - News (cont.)												
Employee: 290007615 - Flanagan, Vester L												
Sun	12/09/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/09/2012	085-1063	0215p	0630p			4.25	0.00	0.00	4.25		XHK
Mon	12/10/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/10/2012	085-1063	0245p	0630p			3.75	0.00	0.00	3.75		XHK
Thu	12/13/2012	085-1063	0730a	0630p			11.00	0.00	0.00	11.00		XHK
Fri	12/14/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/14/2012	085-1063	0215p	0600p			3.75	0.00	0.00	3.75		XHK
Sat	12/15/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/15/2012	085-1063	0200p	0730p			1.25	4.25	0.00	5.50		XHK
Sun	12/16/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/16/2012	085-1063	0230p	0630p			4.00	0.00	0.00	4.00		XHK
Mon	12/17/2012	085-1063	0215p	1145p			9.50	0.00	0.00	9.50		XHK
Thu	12/20/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/20/2012	085-1063	0145p	0700p			5.25	0.00	0.00	5.25		XHK
Fri	12/21/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/21/2012	085-1063	0245p	0515p			2.50	0.00	0.00	2.50		XHK
Sat	12/22/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/22/2012	085-1063	0230p	0630p			2.75	1.25	0.00	4.00		XHK
Sun	12/23/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/23/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
	12/23/2012	085-1063	0800p	0830p			0.50	0.00	0.00	0.50		XHK
Mon	12/24/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/24/2012	085-1063	0215p	0400p			1.75	0.00	0.00	1.75		XHK
Tue	12/25/2012	085-1063	H - Holiday				8.00	0.00	0.00			XHK
Thu	12/27/2012	085-1063	P13 - Paid Time Off 2013				8.00	0.00	0.00			XHK
Fri	12/28/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/28/2012	085-1063	0200p	0600p			4.00	0.00	0.00	4.00		XHK
Sat	12/29/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/29/2012	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK
Sun	12/30/2012	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK
	12/30/2012	085-1063	0230p	0630p			4.00	0.00	0.00	4.00		XHK
Mon	12/31/2012	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	12/31/2012	085-1063	0145p	0630p			4.75	0.00	0.00	4.75		XHK
Tue	01/01/2013	085-1063	H - Holiday				8.00	0.00	0.00			XHK
	01/01/2013	085-1063	REG - Regular Hours				-4.00	0.00	0.00			XHK
	01/01/2013	085-1063	HW - Holiday Worked				8.00	0.00	0.00			XHK
	01/01/2013	085-1063	REG - Regular Hours				-4.00	0.00	0.00			XHK
	01/01/2013	085-1063	0915a	0115p			4.00	0.00	0.00	4.00		XHK
	01/01/2013	085-1063	0230p	0630p			4.00	0.00	0.00	4.00		XHK
Fri	01/04/2013	085-1063	0915a	0615p			9.00	0.00	0.00	9.00		XHK

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PayCode-Description														
Day	Date	Dept - Posn	In	Out	Forced	Unit	Reg	OT	DT	Rate / Total	Amount	Site		
085 - News (cont.)														
Employee: 290007615 - Flanagan, Vester L														
Sat	01/05/2013	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK		
	01/05/2013	085-1063	0200p	0630p			2.25	2.25	0.00	4.50		XHK		
Sun	01/06/2013	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK		
	01/06/2013	085-1063	0200p	0715p			5.25	0.00	0.00	5.25		XHK		
Mon	01/07/2013	085-1063	0915a	0615p			9.00	0.00	0.00	9.00		XHK		
Tue	01/08/2013	085-1063	0900a	0630p			9.50	0.00	0.00	9.50		XHK		
Fri	01/11/2013	085-1063	P13 - Paid Time Off 2013				8.00	0.00	0.00			XHK		
Sat	01/12/2013	085-1063	P13 - Paid Time Off 2013				8.00	0.00	0.00			XHK		
Sun	01/13/2013	085-1063	0900a	0100p			4.00	0.00	0.00	4.00		XHK		
	01/13/2013	085-1063	0200p	0630p			4.50	0.00	0.00	4.50		XHK		
Mon	01/14/2013	085-1063	0900a	0515p			8.25	0.00	0.00	8.25		XHK		
Tue	01/15/2013	085-1063	0900a	0645p			9.75	0.00	0.00	9.75		XHK		
Fri	01/18/2013	085-1063	0900a	0645p			9.75	0.00	0.00	9.75		XHK		
Sat	01/19/2013	085-1063	0900a	0100p			3.75	0.25	0.00	4.00		XHK		
	01/19/2013	085-1063	0130p	0645p			0.00	5.25	0.00	5.25		XHK		
Sun	01/20/2013	085-1063	0900a	0630p			9.50	0.00	0.00	9.50		XHK		
Mon	01/21/2013	085-1063	0915a	0700p			9.75	0.00	0.00	9.75		XHK		
Tue	01/22/2013	085-1063	0915a	0630p			9.25	0.00	0.00	9.25		XHK		
Fri	01/25/2013	085-1063	0900a	0630p			9.50	0.00	0.00	9.50		XHK		
Sat	01/26/2013	085-1063	0900a	0645p			2.00	7.75	0.00	9.75		XHK		
Sun	01/27/2013	085-1063	0730a	1200p			4.50	0.00	0.00	4.50		XHK		
	01/27/2013	085-1063	1245p	0630p			5.75	0.00	0.00	5.75		XHK		
Mon	01/28/2013	085-1063	P13 - Paid Time Off 2013				8.00	0.00	0.00			XHK		
Tue	01/29/2013	085-1063	0915a	1200p			2.75	0.00	0.00	2.75		XHK		
	01/29/2013	085-1063	1245p	0600p			5.25	0.00	0.00	5.25		XHK		
Fri	02/01/2013	085-1063	0900a	0930a			0.50	0.00	0.00	0.50		XHK		

Employee Totals: .568.00 155.50 0.00 1723.50 \$0.00\$0.00

Site Totals:	Reg Hours	1,568.00
	OT Hours	155.50
	DT Hours	0.00
	Total Hours	1,723.50
	Amount	\$0.00

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Report Totals:	Reg Hours	1,568.00
	OT Hours	155.50
	DT Hours	0.00
	Total Hours	1,723.50
	Amount	\$0.00



Re: Bryce's hours

Monica Taylor <mtaylor@schurz.com>

Mon, Apr 2, 2012 at 1:16 PM

To: Bryce Williams <bwilliams@wdbj7.com>

Thanks Bryce!

Sent from my iPhone

On Apr 2, 2012, at 10:13 AM, Bryce Williams <bwilliams@wdbj7.com> wrote:

- > Hello Monica. Here are my hours as requested:
- >
- > Thursday 3/29 9:00-6 Lunch 1-2 8 hours
- > Friday 3/30 9:00-6 Lunch 1-2 8 hours
- > Saturday 3/31 9:00-6 Lunch 1-2 8 hours
- >
- > Please let me know if you have any questions.
- >
- > Thanks--Bryce



RE: timesheet

Monica Taylor <mtaylor@wdbj7.com>
To: Bryce Williams <bwilliams@wdbj7.com>

Mon, Apr 16, 2012 at 10:54 AM

Thanks Bryce.

I approved both of your reimbursements and thought they would have been paid last week. Let me check into it and I will let you know.

My cousin told me he met you. I'm sure he said I was his "favorite." We're all his favorites.

From: Bryce Williams [mailto:bwilliams@wdbj7.com]
Sent: Sunday, April 15, 2012 8:31 PM
To: mtaylor@wdbj7.com
Subject: timesheet

Hello Monica:

Here is my time sheet for this pay period. Will my makeup expense be processed with my moving expenses? By the way, I met your cousin in Pulaski. He was very nice.

Sun	4/1	9-6	1 hr lunch
Mon	4/2	9-6	1 hr lunch
Tues	4/3	off	
Wed	4/4	off	
Thurs	4/5	9-6	1 hr lunch
Fri	4/6	9-6	1 hr lunch
Sat	4/7	9:30 – 7:30pm Pulaski	2 OT no lunch

Sun 4/8 9-6 1 hr lunch

WDBJ-7 000048

Mon 4/9 9-6 1 hr lunch

Tues 4/10 off

Wed 4/11 off

Thurs 4/12 9:30-7:30 2 OT

Fri 4/13 9:30am -7:30pm 2 OT Fire no lunch

Sat 4/14 6:30am – 6:30 pm 1 hour break 3 OT V-tech no lunch

Thanks



Re: Timesaver information

Monica Taylor <mtaylor@wdbj7.com>

Mon, Apr 30, 2012 at 9:17 AM

To: Bryce Williams <bwilliams@wdbj7.com>

Thanks Bryce! My Monday is not bad so far...hope your day is going well!

On Mon, Apr 30, 2012 at 9:06 AM, Bryce Williams <bwilliams@wdbj7.com> wrote:
Hi there Monica I worked 9am-6pm that day 1 hour lunch.

Thank you for everything!!! Hope your Monday has gotten off to a great start.

On Mon, Apr 30, 2012 at 8:51 AM, Monica Taylor <mtaylor@wdbj7.com> wrote:
Hey Bruce,

What time did you work Wednesday when you were called in?

Monica

On Sun, Apr 29, 2012 at 10:09 PM, Bryce Williams <bwilliams@wdbj7.com> wrote:
Hi there Monica:

To save time, I will send my hours to you right now.

I just got back a little while ago from breaking news after starting at 6am so I am not sure I should trust myself with a new process,

Please let me know if this is OK, if not I will gladly attempt timesaver right away.
I will certainly plan on sending that way for the next time period.

Thank you!!!

Sun 4/15 9am - 7pm 1 hour lunch = 8 reg 1 OT

Mon 4/16 9am-11pm no lunch 8 reg 5 OT

Tues 4/17 off

Wed 4/18 called in on day off 0 Reg 8 OT hours

Thurs 4/19 9am-6pm 1 hour lunch 8 REG

Fri 4/20 9am-7pm no lunch 8 reg 2 OT Lynchburg

Sat 4/21 9am-7pm 8 reg 2 OT Radford and Elliston

Sun 4/22 9am-6pm 1 hour lunch 8 reg

WDBJ-7 000050

Mon 4/23 9am -6pm 1 hour lunch 8 reg

Tues 4/24 off

Wed 4/25 off

Thurs 4/26 9am-6pm 1 hour lunch 8 reg

Fri 4/27 9am -7:30 pm 2 packages drug and African teen 8 reg 2.5 OT

Sat 4/28 9am - 11:59 pm Breaking news Henry County 8 reg 7 OT

On Mon, Apr 23, 2012 at 2:48 PM, Bryce Williams <bwilliams@wdbj7.com> wrote:
Hi Monica:

Thanks for this information as well as the expense reimbursement check.

Bryce

On Mon, Apr 23, 2012 at 9:39 AM, Monica Taylor <mtaylor@wdbj7.com> wrote:
Hey Bryce,

Attached is your login information for Timesaver. Let me know if you have any problems with the site.
Timesaver does not work properly with Chrome. Please use Explorer or Firefox.

Thanks,
MT

--
Monica Taylor
HR Business Partner
Schurz Communications, Inc.
Direct phone: 540.777.3206
Main Phone: 540.344.7000
Fax: 540.985.3659

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Monica Taylor
HR Business Partner
Schurz Communications, Inc.
Direct phone: 540.777.3206
Main Phone: 540.344.7000
Fax: 540.985.3659

WDBJ-7 000051

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Monica Taylor

HR Business Partner

Schurz Communications, Inc.

Direct phone: 540.777.3206

Main Phone: 540.344.7000

Fax: 540.985.3659



Bryce's Hours-(timesaver glitch)

Bryce Williams <bwilliams@wdbj7.com>
To: Monica Taylor <mtaylor@wdbj7.com>
Cc: dseidel@wdbj7.com

Sun, May 13, 2012 at 7:24 PM

Hello Monica:


I attempted to enter my hours over the weekend (with Greg and Bethany assisting). However, the system did not allow me to save, approve or calculate my hours.

Therefore, I have attached a file that contains information on the hours worked. I've copied Dave with specific information.

One quick question-- is overtime recorded as any hours above 40 in a week or 80 in a 2-week period. I suppose, in some cases, that could make a difference.

Thank you.

Bryce

 **Hours Week ending 051212.docx**
27K

Hours Week ending 051212

Sunday 4/29/12 Breaking News in Henry County 6am-9pm (30 minutes lunch) 14.5 hours total

Monday 4/30/12 9am -10PM 13 total Henry County waiting for suspect (no lunch)

Tues OFF

Wed OFF

Thurs 5/3 training 9am -6pm 1 hour lunch

Fri 5/4 9am-7pm calls for Journells (no lunch) 10 hours total

Sat 5/5 8am -8pm (No lunch) early for radford , Pkg + 2 vo/sots Mr Journell calls

20-minute convo to Germany





























Sun 5/6 9-7 (no break) Rocky Mount 10 hours total

Monday 5/7 Sweeps shoot 9am-7pm (1 hour lunch) 8 hours total

Thurs 5/10 Sick day

Fri 5/11 9am-7pm = 10 hours (no lunch)

Sat 5/12 9am – 8pm ½ hour lunch 10.5 hours

Actions	Day	Date	Site	Dept-Position	In	Out	Pay Code	Hours	Am
 	Sun	04/29/2012	XHK00	085-1063					
 	Sun	04/29/2012	XHK00	085-1063	06:00 AM	01:00 PM		0.00	
 	Sun	04/29/2012	XHK00	085-1063	01:30 PM	09:00 PM			
 	Mon	04/30/2012	XHK00	085-1063	09:00 AM	10:00 PM		0.00	
 	Thu	05/03/2012	XHK00	085-1063	09:00 AM	12:00 PM		9.00	
 	Thu	05/03/2012	XHK00	085-1063	01:00 PM	06:00 PM			
 	Fri	05/04/2012	XHK00	085-1063	09:00 AM	07:00 PM			
 	Sat	05/05/2012	XHK00	085-1063	08:00 AM	08:00 PM			
 	Sun	05/06/2012	XHK00	085-1063	09:00 AM	07:00 PM			
 	Mon	05/07/2012	XHK00	085-1063	09:00 AM	12:00 PM			
 	Mon	05/07/2012	XHK00	085-1063	01:00 PM	07:00 PM			
 	Fri	05/11/2012	XHK00	085-1063	09:00 AM	07:00 PM			
 	Sat	05/12/2012	XHK00	085-1063	09:00 AM	12:00 PM			
 	Sat	05/12/2012	XHK00	085-1063	12:30 PM	08:00 PM			
Total Hours:		11.00 hrs	Hour Pay Code Total:		2.00 hrs	Dollar Pay Code Total:		\$0.0000	Project Total: 0.00

WDBJ-7 000055



Bryce's hours

Bryce Williams <bwilliams@wdbj7.com>

Sun, May 27, 2012 at 9:12 PM

To: Monica Taylor <mtaylor@wdbj7.com>, Monica Taylor <mtaylor@schurz.com>

Hi there Monica:

Our friend "timesaver" is acting up again. I still have my notes from when I received my user/pw but timesaver is simply not accepting them. I have attached my hours. I'll cut and paste just in case.

Also, when you get a chance, were you able to find a clicker?

Thanks!!

Bryce

Sunday 5/13/12 9am-8pm ½ hour lunch 10.5 total 2.5 OT

Monday 5/14/12 9am-11pm ½ hour lunch (long day—sweeps writing)

Tues OFF

Wed OFF

Thursday 5/17/12 9:15am-6:45pm no lunch 9.5 total 1.5 OT

Friday 5/18/12 9:15am-7:30 pm 30 minute lunch 10.25 total 2.25 OT

Saturday 5/19/12 8:30am-7:15 pm 30 minute lunch came in early to go to Lynchburg

10.25 total 2.25 OT

Sunday 5/20/12 9:15 am – 8pm 1 hour lunch 9.75 total 1.75 OT

Stayed for live shot in Salem then intv Brenda Hale afterwards

Monday 5/21/12 9:15am -5pm no lunch training/editing vo/sot Feeding America 7.75 total

Tues OFF

Wed OFF

Thurs 5/24/12 8:15am -6pm No Lunch early for W&L Graduation/Lexington 9.75 total 1.75 OT

Fri 5/25/12 9am- 7pm 45minute break 9.25 total 1.25 OT

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Sunday 5/13/12 9am-8pm ½ hour lunch 10.5 total 2.5 OT

Monday 5/14/12 9am-11pm ½ hour lunch (long day—sweeps writing)

Tues OFF

Wed OFF

Thursday 5/17/12 9:15am-6:45pm no lunch 9.5 total 1.5 OT

Friday 5/18/12 9:15am-7:30 pm 30 minute lunch 10.25 total 2.25 OT

Saturday 5/19/12 8:30am-7:15 pm 30 minute lunch came in early to go to Lynchburg
10.25 total 2.25 OT

Sunday 5/20/12 9:15 am – 8pm 1 hour lunch 9.75 total 1.75 OT

Stayed for live shot in Salem then intv Brenda Hale afterwards

Monday 5/21/12 9:15am -5pm no lunch training/editing vo/sot Feeding America 7.75 total

Tues OFF

Wed OFF

Thurs 5/24/12 8:15am -6pm No Lunch early for W&L Graduation/Lexington 9.75 total 1.75 OT

Fri 5/25/12 9am- 7pm 45minute break 9.25 total 1.25 OT



Re: Whew! Timesaver is just fine

Monica Taylor <mtaylor@wdbj7.com>

Mon, Jun 11, 2012 at 9:54 AM

To: David Seidel <dseidel@wdbj7.com>

I have them. They were attached to the email.

Monica

On Mon, Jun 11, 2012 at 8:40 AM, David Seidel <dseidel@wdbj7.com> wrote:
I thought you said you included those hours in an email to Monica?

On Sun, Jun 10, 2012 at 9:12 PM, Bryce Williams <bwilliams@wdbj7.com> wrote:
Hello Dave and Monica:

I believe I am a "Timesaver Pro now". The password works fine and it's user-friendly.

Just in case, I've attached an MS-word doc with my hours.

Important:

- I forgot to put my hours for Sat 5/26 on my last timecard (ms word doc) so I added the hours to Tues 5/29 even though I did not work that date BUT timesaver won't allow me to add a date outside of the time period.
- It is my understanding that of those 9 hours, 5.5 should be calculated at time and a half
- Would you please confirm my holiday hours are correctly represented? For some reason, timesaver creates some strange looking code/calculations for hol hours like minus signs.

Thank you!!! Bryce

—

David Seidel
WDBJ7 Assignment Manager
540-985-3600 office
540-344-5097 fax

—

Monica Taylor
HR Business Partner
Schurz Communications, Inc.

WDBJ-7 000058



Re: time saver issues (time sheet attached)

Monica Taylor <mtaylor@wdbj7.com>

Mon, Aug 6, 2012 at 1:49 PM

To: David Seidel <dseidel@wdbj7.com>, Bryce Williams <bwilliams@wdbj7.com>

Dave,

Have Bryce to finish and sign off on his timecard as soon as he returns.

Thanks,
Monica

On Mon, Aug 6, 2012 at 9:49 AM, David Seidel <dseidel@wdbj7.com> wrote:
Bryce is out on a story and won't be back until the afternoon.

On Mon, Aug 6, 2012 at 9:11 AM, Monica Taylor <mtaylor@wdbj7.com> wrote:
Bryce...your password has been reset to: schurz123. Please enter your time asap. All timecards must be complete by 10:00 this morning.

Thanks,
Monica

On Sun, Aug 5, 2012 at 7:40 PM, Bryce Williams <bwilliams@wdbj7.com> wrote:
Dave and Monica:

For some reason, I am unable to log into my time saver account. I've attached an MS word doc with my hours and have included them in this email as well. Thank you.

Bryce

Hours 7/22/12- 8/4/12

Sun	7/22	9am-6:15pm	90 minute lunch	live shot @ fire company
Mon	7/23	9am-7pm	no lunch	live from Smith Mountain Lake
Tues	off			
Wed	off			
Thurs	7/26	9am-6pm	30 min lunch	met with sources in beat area/Sgt. Young/Superintendent

WDBJ-7 000059

RECOGNIZANCE

VA. CODE §§ 8.01-408, 19.2-135, 19.2-136

CITY OF ROANOKE GENERAL DISTRICT COURT

CITY OR COUNTY

☒ General District Court ☐ Juvenile and Domestic Relations District Court

Each of the undersigned hereby promises to appear before this Court on

July 14, 2014 - 2:00 PM
DATE AND TIME

, and to appear at every other place and time

to which this case may be rescheduled or continued, during this trial and on appeal, and to remain in Court upon each appearance until given leave by the Court to depart.

Each of the undersigned acknowledges himself, his heirs, and assigns indebted jointly and severally in the sum of

\$ to the locality named above to guarantee that each of us will appear as promised, and each waives all benefit of homestead exemptions as to this debt. For those of us who appear as promised, we will not owe this debt. For those of us who do not appear as promised, we remain liable for paying this debt and understand that we also may be punished by a fine and a jail sentence.

(NAME, ADDRESS, TELEPHONE NO.)

1	NAME ADDRESS LOCATION TELEPHONE
2	NAME ADDRESS LOCATION TELEPHONE
3	NAME ADDRESS LOCATION TELEPHONE

4	NAME ADDRESS LOCATION TELEPHONE
---	---------------------------------------------------------------------------

(SIGNATURE)

1 [Signature] (SEAL)

2 Maisha Taylor (SEAL)

3 (SEAL)

4 (SEAL)

Subscribed and sworn to before me this day.

5/8/14
DATE

☐ CLERK ☐ JUDGE

HEARING DATE

CASE NO.

7/14/14 - 2:00 PM

RECOGNIZANCE

☐ Commonwealth of Virginia

☐ Vester Flanagan
3015 Ordway I

In re / V.

WDBJ - 7
DEFENDANT
2807 Hershey Rd
Roanoke VA 24017
(540)

CRIMINAL DIV 853-2361

TRAFFIC DIV 853-2767

CIVIL DIV 853-2364

5/26/14

Mr. Vester Flanagan
3015 Ordway Drive, NW
Apt. J
Roanoke, VA 24017

Mr. Rick S. Kahl
Clerk, Roanoke City District Court
315 W. Church Ave, SW
2nd Floor
Roanoke, VA 24016-5007

7-14-14
2:00PM

FLANAGAN
VS
WDBJ-7

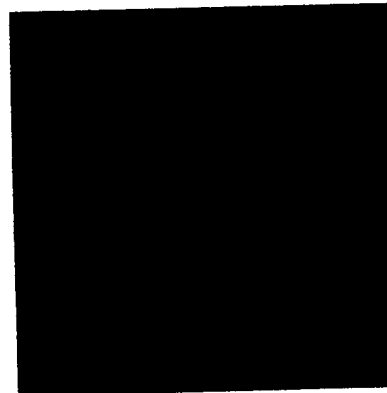
Dear Mr. Kahl,

Please find a copy of the Bill of Particulars requested by the court. A copy has been mailed to the Honorable Francis W. Burkart, III, and Mr. Vijay K. Mago.

Best regards,


Vester Flanagan

2014 JUN 2 PM 4:18



2014 JUN 2 PM 4:20

BILL OF PARTICULARS
Commonwealth of Virginia Rule 7B:2

Case No. GV 1400 3506

July 14, 2014 2PM

TRIAL DATE AND TIME

Roanoke City

CITY OR COUNTY

General District Court

315 W. Church Ave S.W., 2nd Floor, Roanoke, VA 24016

STREET ADDRESS OF COURT

Vester Flanagan

PLAINTIFF

WDBJ-7

DEFENDANT

500;

TO THE PLAINTIFF:

You are required to file, and serve by mailing, a written bill of particulars by 5-29-14 DATE

You are further required to fully state, in the numbered paragraphs below, each of the reasons/grounds why you think the defendant owes you the money or property claimed. You may attach additional paper if needed.

1. Unpaid Overtime
(see attached)
2. Wrongful Termination
(see attached)
3. Retaliation
(see attached)
4. Hostile Work Environment
(see attached)
5. Racial Harassment/Discrimination
(see attached)

☒ See continuation sheet.

NOTICES: Failure to comply with this order may be grounds for awarding summary judgment in favor of the adverse party. This is not evidence. Both parties still must be prepared, at trial, to prove their case with admissible evidence. Upon trial, the judge may exclude evidence as to matters not described in this pleading.

CERTIFICATE OF MAILING BY PLAINTIFF

I certify I mailed a completed copy of this Bill of Particulars to the clerk of this court and to each attorney for the defendant, or to the defendant if not represented, this 27th day of May, 2014.

cc = Mr. Rick S. Kahl, Clerk
Mr. Vijay K. Mago

[Signature]
SIGNATURE OF PLAINTIFF

6. Sexual harassment (see attached)
7. Irreparable damage to my career
8. Mental anguish/depression/embarrassment/humiliation
9. Substantial loss of personal time
10. Wasted PTO
11. Court costs/postage
12. Punitive damages
13. Credit card and other debt as a result of their actions

5/26/14

Mr. Vester Flanagan
3015 Ordway Drive, NW
Apt. J
Roanoke, VA 24017

The Honorable Judge Francis Burkart, III
Roanoke City General District Court
315 W. Church Avenue, S.W.
2nd Floor
Roanoke, VA 24016

Dear Judge Burkart,

I am writing in response to the Plaintiff's objections to my request to obtain documents pertaining to Case #GV14003506. Their objections are invalid.

In order to prove my case, I need various documents. Please see the details that follow.

Your Honor, what I encountered while employed at WDBJ-7 was nothing short of vile, disgusting and inexcusable. I will be able to prove the Defendant broke several laws. Judge Burkart, I realize this is the ultimate "David vs. Goliath" scenario, so to speak. However, I am neither intimidated nor fearful. While I may not be an expert with regards to case law and legal terms, I AM an expert when it comes to integrity, character and the difference between right and wrong.

I am hereby requesting a trial which will be heard by a jury of my peers. I would like my jury to be comprised of African-American women.

At this time, I feel it may be necessary to contact the Federal Bureau of investigations as well as the Department of Justice. I may need assistance with computer forensics as well as other technological assistance. An explanation is included in this correspondence.

I will not rest until this matter is resolved. I am a very, very persistent person and will utilize every resource I have to achieve justice and stand up for the rights of others at the same time.

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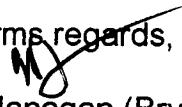
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All of this is just the tip of the iceberg. There is so, so, so much more to this case that will come out during the trial.

Your Honor, I trust you as a leader in our judicial system. I trust you as a family man. You are a person of high moral standards and fairness. Once you hear the facts of this case, you will be astounded when you discover the egregious acts that took place at WDBJ-7.

I look forward to seeing you soon.

With warm regards,


Vester Flanagan (Bryce Williams)

cc: Mr. Rick S. Kahl, clerk
Mr. Vijay K. Mago

RESPONSE TO OPPOSING COUNSEL'S OBJECTIONS

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Additionally, since several WDBJ-7 employees will be called to testify, perhaps their testimony can be used in lieu of actual documents. I need to discuss this further with Opposing Counsel.

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WEBSITE ARTICLES WITH TIME STAMPS

Shortly after my departure from the station, the station's website was revamped. Can Opposing Counsel please show the court where "Bryce Williams' " videos are? Was the format not changed VERY soon after Mr. Flanagan was let go? The station cannot use time as an excuse. That is, I noticed my videos were gone very soon after I was terminated.

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My former manager, Dan Dennison, specifically told me he could not pay me for overtime hours. I gave a lot to this company and I want the money I earned. They essentially stole from me and Mr. Dennison's comments can be interpreted as coercion and intimidation. Bottom line—the station broke the law.

PERSONNEL FILES/DISPARITY IN TREATMENT

If Opposing Counsel cannot produce ALL personnel files requested, perhaps they can produce SOME?

My intention is to prove a disparity in treatment with regards to the way in which African-American employees are treated compared to non-minorities.

During an altercation with Susan Bahorich, I was verbally assaulted and intimidated as Ms. Bahorich was holding a sharp object (a pen) which could have been used as a weapon. Opposing Counsel got the facts wrong when mentioning that Ms. Bahorich did not use profanity. Yes, she did. Ms. Bahorich also apologized MULTIPLE times. Why did she do so if she was not wrong? I have a witness who was on the cell phone with me at the time of the conversation. Why did she pick the fight in the first place? She has a history of bullying people including, but not limited to, former photographer Gerry McCarthy.

Why wasn't Ms. Bahorich written up?

Why wasn't photographer Mr. Rob Chewning written up when he attacked me in full view of onlookers while filming at Smith Mountain Lake. He assaulted me! He berated me by telling me I was not a good reporter and he also YANKED the microphone out of my hand. This is permissible behavior? Based on the employee handbook, isn't this type of behavior prohibited?

In hindsight, I wish I would have called the police on Mr. Chewning AND Ms. Bahorich.

Why wasn't Mr. Chewning written up? Was his outburst in the infamous meeting noted? Was it noted that he asked "What am I supposed to do, make a list of the things I can't say to Black people?" Was that noted? He has an African-American partner? I cannot believe someone would risk their credibility by stating this ridiculous defense. It's not even worthy of a reply from me. Anyone with a television knows that you can be a racist no matter who you date!

Was reporter Justin McCloud written up when he yanked a camera away from photographer Gerry McCarthy? Station management had a history of allowing employees to gang up on certain employees. It is QUITE profound that even the news director, Mr. Dan Dennison, even admitted that "piling on" was taking place. This is the same manager who wrote me up numerous times and he also played devil's advocate whenever I would voice complaints. Even HE admitted I was being bullied. Under oath he would have to admit this. Also, Mr. Greg Baldwin admitted that Mr. Dan Dennison was questioning if what he "thought was happening" was happening. That is, even Mr. Dennison saw there were "racial issues."

I have compelling evidence in this case. I will include some of the egregious texts sent by Mr. Greg Baldwin, my immediate supervisor. One of them shows an "inappropriate image" and I would not feel comfortable sending it to you right now but I will bring it to the trial.

One of the texts will be especially "alarming" to the station's General Manager and others.

I need to see Dan Dennison's personnel records to see why he was demoted.

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It's interesting that Opposing Counsel has tried to make me out to be a monster. I beg to differ. Opposing Counsel lacks credibility. Their response to the EEOC charges contains errors and is incomplete.

Also, Opposing Counsel never addressed my work ethic. Was I EVER late to work, EVER? Even once? What was my official "reporting time" for work and what time did I

arrive? I wasn't "on-time"...I was early each day. I never complained about assignments although many lacked newsworthiness and were just plain boring. Also, I was the one who offered to work through the night when the Derecho of 2012 hit. My assignment manager was going to send me home during the biggest story of the year! I was the one who volunteered to work **even though I had already worked a full shift**. That does not sound like a monster to me.

Why was it that NOT ONE SINGLE producer complained about me? Why were complaints made only by photographers with the exception of one reporter who was a known bully? I find that interesting and so will a jury!

Melissa Gaona will be called to testify. She will be asked about incidents during which Ms. Bahorich also harassed her. Melissa cannot deny we were close. I still have her wedding invitation and she once bragged that I was one of the few people she actually liked at the station (and who she invited to her wedding).

Why was I let go after management noted an "improvement?" And why was I not given a reason for my termination? How heartless can you be? My entire life was disrupted after moving clear across the country for a job only to have my dream turn into a nightmare.

The assistant news director, Greg Baldwin, shared lots of inside information with me. This will come out in the trial. WDBJ-7 has a lot to hide. Several scandals made it difficult to work there. A former "weatherman" was so bold with his affair with a production employee that his wife called HR. What ever happened with that? Also, one of my producers, Melanie Crabtree, had no problems sleeping with a married man who was also a WDBJ-7 employee.

Your Honor, I am not the monster here. I get along with my current co-workers AND I was just recognized by a senior manager at corporate. That sure doesn't sound like the monster I was painted to be.

There are many more questions the Plaintiff will have to answer at trial time. The aforementioned reasons validate the need for the requested material to be produced.

BILL OF PARTICULARS
Commonwealth of Virginia Rule 7B:2

Case No. GV 14003506

July 14, 2014 2PM

TRIAL DATE AND TIME

Roanoke City

CITY OR COUNTY

General District Court

315 W. Church Ave S.W., 2nd Floor, Roanoke, VA 24016

STREET ADDRESS OF COURT

Vester Flanagan

PLAINTIFF

WDBJ-7

DEFENDANT

500

TO THE PLAINTIFF:

You are required to file, and serve by mailing, a written bill of particulars by 5-29-14

DATE

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(see attached)
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2014 MAY 28 PM 4:11

☒ See continuation sheet.

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CERTIFICATE OF MAILING BY PLAINTIFF

I certify I mailed a completed copy of this Bill of Particulars to the clerk of this court and to each attorney for the defendant, or to the defendant if not represented, this 27th day of May, 2014.

cc = Mr. Rick S. Kahl, Clerk
Mr. Vijay K. Mago

[Signature]
SIGNATURE OF PLAINTIFF

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5/26/14

Mr. Vester Flanagan
3015 Ordway Drive, NW
Apt. J
Roanoke, VA 24017

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With ~~warms~~ regards,


Vester Flanagan (Bryce Williams)

cc: Mr. Rick S. Kahl, clerk
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5/26/14

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Apt. J
Roanoke, VA 24017

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315 W. Church Avenue, S.W.
2nd Floor
Roanoke, VA 24016

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Best regards,


Vester Flanagan

VERIFIED MAIL

Mr. Vester Flanagan
3015 Ordway Dr. N1

APT 3

Roanoke VA 24017



7013 3020 0002 1689 6914



1000



24016

U.S. POSTAGE
\$5.49
JUN 24 2014
ROANOKE VA
24017-14

\$5.49
00028769-02

RETURN RECEIPT
REQUESTED

Honorable Francis W. Burkart
Presiding Judge
Roanoke City District Court
315 W. Church Ave SW, 2nd Floor
Roanoke, VA 24016



COMMONWEALTH of VIRGINIA

Chief Judge
JACQUELINE F. WARD TALEVI

Judges
VINCENT A. LILLEY
FRANCIS W. BURKART, III
M. FREDERICK KING
J. CHRISTOPHER CLEMENS

23RD JUDICIAL DISTRICT
CITY OF ROANOKE GENERAL DISTRICT COURT
SECOND FLOOR, 315 W. CHURCH AVENUE
ROANOKE, VIRGINIA 24016-5007

RICK S. KAHL
Clerk

Date: 06/20/14

To: LeClair Ryan
Attn: Vijay K. Mago
951 E Byrd Street, 8th Floor
Richmond VA 23219

RE: Vester L Flanagan vs Jeffrey Marks, R/A WDBj-7, GV14003506

As discussed earlier today, both parties should appear for a hearing to address Mr Flanagan's issues on July 8, 2014 at 11:00 am. If you have any questions, please call us at (540) 853-2364.

J. Black
Deputy Clerk

CC: Vester Flanagan

MAILED
6-20-14

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:13

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

Please subpoena the witnesses below to appear before the Court on the date shown. (See Va. Code § 17.1-617 regarding limitation on compensation of subpoenaed witnesses.) Requests for subpoenas for witnesses should be filed at least ten days prior to trial or hearing.

WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

NAME (LAST, FIRST, MIDDLE) Rob Chenning WDBJ-7 STREET ADDRESS/LOCATION 2807 Hershbarger Rd Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co <input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER	NAME (LAST, FIRST, MIDDLE) Greg Baldwin WDBJ-7 STREET ADDRESS/LOCATION 2807 Hershbarger Rd Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co <input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER
NAME (LAST, FIRST, MIDDLE) Jeffrey Mark WDBJ-7 STREET ADDRESS/LOCATION 2807 Hershbarger Rd Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co <input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER	NAME (LAST, FIRST, MIDDLE) Melissa Gaona WDBJ-7 STREET ADDRESS/LOCATION 2807 Hershbarger Rd Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co <input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER

CASE NO.

GV 1400 3506

REQUEST FOR WITNESS SUBPOENA

☐ Commonwealth of Virginia
☒ CITY ☐ COUNTY ☐ TOWN of

Roanoke, VA

X Vester Flanagan

NAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
(IN CIVIL CASES ONLY)

v./ In re

WDBJ-7 TV

NAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
LIST ONLY ONE DEFENDANT

Charge: _____
(TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME: 2PM 7/14/14
315 W. Church Ave Roanoke

REQUEST ON BEHALF OF

☐ Commonwealth ☐ City, County, Town of
☒ PLAINTIFF(S) ☐ DEFENDANT(S) ☐ JUVENILE
☐ PETITIONER ☐ RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:13

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

Please subpoena the witnesses below to appear before the Court on the date shown. (See Va. Code § 17.1-617 regarding limitation on compensation of subpoenaed witnesses.) Requests for subpoenas for witnesses should be filed at least ten days prior to trial or hearing.

WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

<p>Lynn Eller WDBJ-7 NAME (LAST, FIRST, MIDDLE) 2807 Hershbenger Rd STREET ADDRESS/LOCATION Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co. <input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER</p>	<p>Trevor Fair WDBJ-7 NAME (LAST, FIRST, MIDDLE) 2807 Hershbenger Rd STREET ADDRESS/LOCATION Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co. <input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER</p>
<p>Adam Ward WDBJ-7 NAME (LAST, FIRST, MIDDLE) 2807 Hershbenger Rd STREET ADDRESS/LOCATION Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co. <input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER</p>	<p>Susan Bahorich WDBJ-7 NAME (LAST, FIRST, MIDDLE) 2807 Hershbenger Rd STREET ADDRESS/LOCATION Roanoke VA 24017 CITY, STATE, ZIP CODE Roanoke Roanoke Co. <input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME (540) 344-7000 TELEPHONE NUMBER</p>

CASE NO.
GV 1400 3506**REQUEST FOR WITNESS SUBPOENA**

☐ Commonwealth of Virginia
☒ CITY ☐ COUNTY ☐ TOWN of

Roanoke, VA

☒ Vester FlanaganNAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
(IN CIVIL CASES ONLY)v./ In re
WDBJ-7 TVNAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
LIST ONLY ONE DEFENDANT

Charge: (TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME:

2PM 7/14/14
315 W. Church Ave Roanoke VA 24016
2014 JUN 9 AM 10:20

REQUEST ON BEHALF OF

☐ Commonwealth ☐ City, County, Town of
☒ PLAINTIFF(S) ☐ DEFENDANT(S) ☐ JUVENILE
☐ PETITIONER ☐ RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:13

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

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WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

<p>Monica Taylor WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF [] COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Laura Wood WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF [] COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>
<p>Kimberly Pinckney</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>WDBJ-7 2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF [] COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p></p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p></p> <p>STREET ADDRESS/LOCATION</p> <p></p> <p>CITY, STATE, ZIP CODE</p> <p>[] CITY OF [] COUNTY NAME</p> <p>()</p> <p>TELEPHONE NUMBER</p>

CASE NO.

GV1400 3506

REQUEST FOR WITNESS SUBPOENA

[] Commonwealth of Virginia
☒ CITY [] COUNTY [] TOWN of

Roanoke, VA

☒ Vester Flanagan
NAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
(IN CIVIL CASES ONLY)

v./ In re

WDBJ-7-TV

NAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
LIST ONLY ONE DEFENDANT

Charge: (TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME: 2PM 7/14/14
7/14/14 315 W. Church Ave
2014 JUN 28 24016

REQUEST ON BEHALF OF

[] Commonwealth [] City, County, Town of
☒ PLAINTIFF(S) [] DEFENDANT(S) [] JUVENILE
[] PETITIONER [] RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED



COMMONWEALTH of VIRGINIA

Chief Judge
JACQUELINE F. WARD TALEVI

Judges
VINCENT A. LILLEY
FRANCIS W. BURKART, III
M. FREDERICK KING
J. CHRISTOPHER CLEMENS

23RD JUDICIAL DISTRICT
CITY OF ROANOKE GENERAL DISTRICT COURT
SECOND FLOOR, 315 W. CHURCH AVENUE
ROANOKE, VIRGINIA 24016-5007

RICK S. KAHL
Clerk

Date: 06/20/14

To: LeClair Ryan
Attn: Vijay K. Mago
951 E Byrd Street, 8th Floor
Richmond VA 23219

RE: Vester L Flanagan vs Jeffrey Marks, R/A WDBj-7, GV14003506

As discussed earlier today, both parties should appear for a hearing to address Mr Flanagan's issues on July 8, 2014 at 11:00 am. If you have any questions, please call us at (540) 853-2364.

J. Black
Deputy Clerk

CC: Vester Flanagan

MAILED
6-20-14

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:12

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

Please subpoena the witnesses below to appear before the Court on the date shown. (See Va. Code § 17.1-617 regarding limitation on compensation of subpoenaed witnesses.) Requests for subpoenas for witnesses should be filed at least ten days prior to trial or hearing.

WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

<p>Rob Chenning WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co</p> <p><input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Greg Baldwin WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co</p> <p><input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>
<p>Jeffrey Marks WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co</p> <p><input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Melissa Gaona WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co</p> <p><input checked="" type="checkbox"/> CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>

CASE NO.

GV 1400 3506

REQUEST FOR WITNESS SUBPOENA

☐ Commonwealth of Virginia
☒ CITY ☐ COUNTY ☐ TOWN of

Roanoke, VA

Vester Flanagan

NAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
(IN CIVIL CASES ONLY)

v./ In re

WDBJ-7 TV

NAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
LIST ONLY ONE DEFENDANT

Charge: _____
(TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME: 2PM 7/14/14
315 W. Church St. Roanoke, VA 24014

REQUEST ON BEHALF OF

☐ Commonwealth ☐ City, County, Town of
☒ PLAINTIFF(S) ☐ DEFENDANT(S) ☐ JUVENILE
☐ PETITIONER ☐ RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:13

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

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WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

<p>Lynn Eller WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershbenger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co.</p> <p><input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Trevor Fair WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershbenger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co.</p> <p><input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>
<p>Adam Ward WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershbenger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co.</p> <p><input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Susan Bahorich WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Hershbenger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke Co.</p> <p><input checked="" type="checkbox"/> CITY OF <input type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>

GV 1400 3506

CASE NO.

REQUEST FOR WITNESS SUBPOENA

☐ Commonwealth of Virginia
☒ CITY ☐ COUNTY ☐ TOWN of

Roanoke, VA

☒ Vester Flanagan

NAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
 (IN CIVIL CASES ONLY)

v./ In re

WDBJ-7 +V

NAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
 LIST ONLY ONE DEFENDANT

Charge: (TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME:

2PM 7/14/14
 315 W. Church Ave Roanoke VA 24016

REQUEST ON BEHALF OF

2014 JUN 9 AM 10:28

☐ Commonwealth ☐ City, County, Town of
☒ PLAINTIFF(S) ☐ DEFENDANT(S) ☐ JUVENILE
☐ PETITIONER ☐ RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED

REQUEST FOR WITNESS SUBPOENA

Commonwealth of Virginia

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617, 19.2-267

Rules 3A:12, 7A:12, 8:13

(PLEASE PRINT)

Roanoke City

CITY OR COUNTY

☒ GENERAL DISTRICT COURT (☐ Civil ☐ Criminal ☐ Traffic)
☐ JUVENILE AND DOMESTIC RELATIONS DISTRICT COURT

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WITNESSES (IF MAILING ADDRESS IS RFD, P.O. BOX, ETC., PLEASE INDICATE LOCATION WHERE WITNESSES CAN BE FOUND.)

<p>Monica Taylor WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p>Laura Wood WDBJ-7</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>
<p>Kimberly Pinckney</p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p>WDBJ-7 2807 Herdberger Rd</p> <p>STREET ADDRESS/LOCATION</p> <p>Roanoke VA 24017</p> <p>CITY, STATE, ZIP CODE</p> <p>Roanoke Roanoke (0</p> <p>CITY OF <input checked="" type="checkbox"/> COUNTY NAME</p> <p>(540) 344-7000</p> <p>TELEPHONE NUMBER</p>	<p></p> <p>NAME (LAST, FIRST, MIDDLE)</p> <p></p> <p>STREET ADDRESS/LOCATION</p> <p></p> <p>CITY, STATE, ZIP CODE</p> <p></p> <p>CITY OF <input type="checkbox"/> COUNTY NAME</p> <p>(.....)</p> <p>TELEPHONE NUMBER</p>

CASE NO.

GV1400 3506

REQUEST FOR WITNESS SUBPOENA

☐ Commonwealth of Virginia
☒ CITY ☐ COUNTY ☐ TOWN of

Roanoke, VA

☒ Vester Flanagan

NAME OF PLAINTIFF(S)/PETITIONER(S) (LAST, FIRST, MIDDLE)
 (IN CIVIL CASES ONLY)

v./ In re

WDBJ-7-TV

NAME OF DEFENDANT/CHILD (LAST, FIRST, MIDDLE)
 LIST ONLY ONE DEFENDANT

Charge: _____
 (TRAFFIC OR CRIMINAL CASE)

COURT DATE AND TIME: 2PM 7/14/14

7/14/14 315 W. Church Ave
 2014 JUN 28 10:10
 24016

REQUEST ON BEHALF OF

☐ Commonwealth ☐ City, County, Town of 2014 JUN
☒ PLAINTIFF(S) ☐ DEFENDANT(S) ☐ JUVENILE
☐ PETITIONER ☐ RESPONDENT

REQUESTED BY:

Vester Flanagan

PRINTED NAME

SIGNATURE

(540) 685-3231

TELEPHONE NUMBER

COURT USE ONLY

DATE RECEIVED

DATE ISSUED

2

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME LAURA WOOD

ADDR WDBJ 7

2807 HERSHBERGER RD

ROANOKE VA

24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Monica Taylor*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

M. J. H. H. H.
SERVING OFFICER

06/13/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38797

[] Commonwealth of Virginia [or]

☒ CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/11/2014

DATE ISSUED

Dep. X *W. H. H. H.*
[] CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME KIMBERLY PINCKNEY

ADDR WDBJ 7

2807 HERSHBERGER RD

ROANOKE VA

24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Mona Tahn*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

M. J. Lacey
SERVING OFFICER

06/31/14
DATE

for

T. A. Lacey

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38732

[] Commonwealth of Virginia [or]

☒ CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/11/2014

DATE ISSUED

M. J. Lacey
By *OK* CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a **(1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated**, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME LYNN ELLER WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

38309

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dep ☒ CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME LYNN ELLER WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

[] Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

CASE NO

07/14/2014

GV14003506-00

2:00pm

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a **(1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated**, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

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- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME ADAM WARD WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *M. G. Bell*

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

SERVING OFFICER

06/12/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

38308

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dep ☒ CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME ADAM WARD WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☐ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒

VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dup ☒ CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil ☐ Criminal ☐ Traffic)

☐ Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME TREVOR FAIR WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Mike Bell*

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

SERVING OFFICER

06/12/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

2:00pm

CASE NO

GV14003506-00

38307

☐ Commonwealth of Virginia [or]

☐ CITY ☐ COUNTY ☐ TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

☐ Commonwealth of Virginia [or]

☐ the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

☐ Defendant(s) [or]

☐ Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dep ☒ CLERK ☐ MAGISTRATE ☐ JUDGE
☐ PROSECUTING ☐ DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

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- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME TREVOR FAIR WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☐ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

CLERK [] MAGISTRATE [] JUDGE

PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME SUSAN BAHORICH WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Mike Bell*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

06/12/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

38306

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dep [] CLERK [] MAGISTRATE [] JUDGE

[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME SUSAN BAHORICH WDBJ-7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

[] Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

2:00pm

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

Dep [] CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil ☐ Criminal ☐ Traffic)

☐ Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME MELISSA GAONA WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Monica Taylor*

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

M. J. Hancy
SERVING OFFICER

06/13/14
DATE

for

T. A. Hancy

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38792

☐ Commonwealth of Virginia [or]

☐ CITY ☐ COUNTY ☐ TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

☐ Commonwealth of Virginia [or]

☐ the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

☐ Defendant(s) [or]

☐ Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

[Signature]
CLERK ☐ MAGISTRATE ☐ JUDGE

☐ PROSECUTING ☐ DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME MELISSA GAONA WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

[] Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME GREG BALDWIN WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Monica Taylor*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

06/13/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38793

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

☒ CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) **felony** or (2) **assault and battery** or (3) **stalking** or (4) **sexual battery** or (5) **attempted sexual battery** or (6) **driving while intoxicated**, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil ☐ Criminal ☐ Traffic)

☐ Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME GREG BALDWIN WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☐ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

☐ Commonwealth of Virginia [or]

☐ CITY ☐ COUNTY ☐ TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

☐ Commonwealth of Virginia [or]

☐ the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

☐ Defendant(s) [or]

☐ Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

☒ CLERK ☐ MAGISTRATE ☐ JUDGE
☐ PROSECUTING ☐ DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME JEFFREY MARKS WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

☐ Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Munica Taylor*

☐ Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

☐ Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

☐ Served on Secretary of the Commonwealth.

☐ Not Found

M. J. Harry
SERVING OFFICER

06/13/14
DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38794

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

[Signature]
[] CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

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- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
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- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

540-853-2364

STREET ADDRESS OF COURT

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME JEFFREY MARKS WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

[] Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport.

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒

VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on
07/14/2014 at 2:00 PM to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME ROB CHEWNING WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Monica Taylor*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38795

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

[] CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) **felony** or (2) **assault and battery** or (3) **stalking** or (4) **sexual battery** or (5) **attempted sexual battery** or (6) **driving while intoxicated**, you may be entitled to certain information or assistance.

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VICTIMS AND WITNESSES

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SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

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07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME ROB CHEWNING WDBJ7

ADDR 2807 HERSHBERGER RD
ROANOKE VA 24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

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[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

..... [or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/10/2014

DATE ISSUED

☒ CLERK [] MAGISTRATE [] JUDGE

[] PROSECUTING [] DEFENSE ATTORNEY

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VICTIMS AND WITNESSES

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SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil [] Criminal [] Traffic)

[] Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME MONICA TAYLOR

ADDR WDBJ 7

2807 HERSHBERGER RD

ROANOKE VA

24017

[] PERSONAL SERVICE

Tel. No. 540-344-7000

[] Being unable to make personal service, a copy was delivered in the following manner:

☒ Delivered to person found in charge of usual place of business or employment during business hours and giving information of its purport. *Monica Taylor*

[] Delivered to family member (not temporary sojourner or guest) age 16 or older at usual place of abode of party named above after giving information of its purport. List name, age of recipient, and relation to recipient to party named above.

[] Posted on front door or such other door as appears to be the main entrance of usual place of abode, address listed above. (Other authorized recipient not found.)

[] Served on Secretary of the Commonwealth.

[] Not Found

SERVING OFFICER

DATE

for

NOTICE TO WITNESS: Failure to comply with this subpoena could cause you to be fined or jailed for contempt of court. Bring this subpoena with you to court. When asking about this case, have this form in hand.

RETURN DATE

07/14/2014

CASE NO

GV14003506-00

38796

[] Commonwealth of Virginia [or]

[] CITY [] COUNTY [] TOWN of

[or]

☒ VESTER L FLANAGAN

In re / v.

WDBJ-7

Charge:

SUBPOENA for WITNESSES

The witnesses are subpoenaed to testify on behalf of:

[] Commonwealth of Virginia [or]

[] the City, County, or Town indicated [or]

☒ Plaintiff(s) [or]

[] Defendant(s) [or]

[] Juvenile

Subpoena requested by:

VESTER FLANAGAN

06/11/2014

DATE ISSUED

Gregory
[] CLERK [] MAGISTRATE [] JUDGE
[] PROSECUTING [] DEFENSE ATTORNEY

IF YOU ARE THE VICTIM OF A CRIME, defined by the Code of Virginia as anyone suffering physical, psychological or economic harm as a direct result of a (1) felony or (2) assault and battery or (3) stalking or (4) sexual battery or (5) attempted sexual battery or (6) driving while intoxicated, you may be entitled to certain information or assistance.

Contact your local Commonwealth's Attorney's office or Victim-Witness Assistance program for further information.

VICTIMS AND WITNESSES

MAY BE ENTITLED TO THE FOLLOWING SERVICES IN CASES INVOLVING THE CRIMES NAMED ABOVE:

- **PROTECTION** from harm or threats arising from cooperation with law enforcement or prosecution efforts through witness protection programs administered by state, federal or local police. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **SEPARATE** waiting areas during court, where available, that afford privacy and protection from intimidation and that does not place the victim in close proximity to the defendant or the defendant's family. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **FINANCIAL ASSISTANCE** by filing a claim for Crime Victim's Compensation, restitution for damages or loss, or assistance in having promptly returned any property held by law enforcement agencies for evidence. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **EMPLOYER INTERCESSION SERVICES** to minimize loss of pay and other benefits resulting from court appearances, and ensuring that you are not penalized for appearing in court. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **NOTICES** from (1) the Commonwealth's Attorney of court proceedings, changes in court dates, case status and dispositional information (2) the Attorney General of the filing and disposition of any appeal or habeas corpus proceeding in the case, if requested, and (3) a local jail or penitentiary of the convicted assailant's release or escape, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **COURTROOM ASSISTANCE** through the services of an interpreter, confidentiality of your address, telephone number and place of employment, upon your written request. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.
- **VICTIM INPUT** by the preparation of a written victim impact statement after the defendant's conviction and the ability to remain in the courtroom during court proceedings unless you are excluded as a material witness. Upon a written request by the victim, the Commonwealth's Attorney shall consult the victim in a felony case either verbally or in writing to inform the victim of the contents of a proposed plea agreement and to obtain the victim's views, about the disposition of the case, including the victim's views concerning dismissal, pleas, plea negotiations and sentencing. Contact your local Commonwealth's Attorney or Victim-Witness Assistance program for further information.

DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

SUBPOENA FOR WITNESSES

VA. CODE §§ 8.01-407, 16.1-265, 17.1-617,
19.2-267, and Rules 3A:12 and 7A:12

ROANOKE CITY GENERAL DISTRICT - CIVIL

CITY OR COUNTY

☒ General District Court (☒ Civil ☐ Criminal ☐ Traffic)

☐ Juvenile and Domestic Relations District Court

315 W.CHURCH AVE., S.W., ROANOKE, VA 24016

STREET ADDRESS OF COURT

540-853-2364

TELEPHONE NUMBER

TO ANY AUTHORIZED OFFICER:

You are hereby commanded to summon forthwith the witnesses listed below to appear on

07/14/2014

at

2:00 PM

to testify in this case.

DATE

TIME

RETURNS: Each witness was served as indicated below, according to law (unless not found).

NAME MONICA TAYLOR

ADDR WDBJ 7

2807 HERSHBERGER RD

ROANOKE VA

24017

☐ PERSONAL SERVICE

Tel. No. 540-344-7000

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Subpoena requested by:

VESTER FLANAGAN

06/11/2014

DATE ISSUED

Gregory
[] CLERK [] MAGISTRATE [] JUDGE
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DISABILITY ACCOMMODATIONS for losses of hearing, vision, mobility, etc. Contact the court ahead of time.

June 17, 2014

Mr. Vester Flanagan
3015 Ordway Drive NW
Apartment J
Roanoke, VA 24017

Honorable Francis W. Burkart
Presiding Judge
Roanoke City District Court
315 W. Church Ave SW
2nd Floor
Roanoke, VA 24016

Dear Judge Burkart,

I am writing you regarding my upcoming trial on July 14, 2014. I have been in touch with Opposing Counsel but I have yet to receive information that is crucial for my case. That is, I need information on 3rd party vendors used to install the new door lock/badge system, the former system, as well as companies used to archive website news articles. Additionally, I need information regarding the company that archives newsroom scripts.

Also, Your Honor, would it be possible to subpoena a statement from the former news director, Dan Dennison? Mr. Dennison admitted that he felt "piling on" was taking place. This is profound given that Mr. Dennison played devil's advocate and rarely "took my side," if you will. It is my understanding that after being demoted, and quitting soon afterwards, he may have relocated to Hawaii.

Lastly, Your Honor, will this be a jury trial? I would certainly like to request a jury trial. Your assistance regarding this matter is very much appreciated. Please contact me at your earliest convenience by emailing bryce_williams_tvnews@yahoo.com or you may call me at 540-695-2221. Thank you.

Best regards,

Vester Flanagan

* Please contact Plaintiff
and tell him he may set
a hearing with the defendants
to address these issues prior
to trial date.

Pr R
6-18-14

See Judge B. call Mr. Flanagan
near see Judge B. call
He may request hearing to
discuss issues prior to
court Judge B. wants to
figure this out with in
advocate. said to get it
on his date some time.
J. Five
V-19-14
FAX (804) 783-7651
Motion to
Dismiss +
Grounds of DEF