

**IN THE CIRCUIT COURT OF HARDIN COUNTY AT
SAVANNAH, TENNESSEE**

ZACHARY RYE ADAMS,

Plaintiff,

VS.

No. 17-CR-10-PC

STATE OF TENNESSEE,

Defendant.

FILED 8 DAY OF May, 2025 AT _____ AM/PM
TAMMIE WOLFE, CLERK
BY T. Wright, Deputy CLERK

NOTICE OF OBJECTION TO SUBPOENA DUCE TECUM

Pursuant to Rule 45.07 of the Tennessee Rules of Civil Procedure, Attorney Michael E. Scholl is hereby giving notice to all parties of his written objection to the subpoena issued on April 29, 2025 and served upon him on April 30, 2025 in the matter of Zachery Rye Adams v. State of Tennessee.

Said subpoena is seeking information from Counsel concerning his former client, Jason Autry. Counsel would submit that all documentation and testimony sought by the subpoena is covered by the attorney client privilege and work product which has not been waived by Counsel's client Jason Autry.

Counsel has been subpoenaed to appear in this matter on May 21, 2025. Counsel has multiple other court appearances in Shelby County that day, including an appearance in Federal Court for the Western District of Tennessee.

As part of this objection Counsel would state for the record that he never received an offer of settlement in the State of Tennessee v. Jason Autry prior to Mr. Autry's testimony nor was Counsel promised anything for Mr. Autry's testimony.

Lastly, Counsel has searched his records and can find no documents which relates to this subpoena. If the court were to compel the testimony of Counsel, Counsel would request under the current law that his testimony be taken by deposition.

Respectfully submitted:

s/ Michael E. Scholl
MICHAEL E. SCHOLL (16284)
Attorney
253 Adams Avenue
Memphis, Tennessee 38103
(901) 529-8500

CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that a true and exact copy of the foregoing document has been served upon Douglas Thompson Bates, IV and Amy Weirich via electronic delivery, on this the 8th day of May 2025.

s/ Michael E. Scholl
MICHAEL E. SCHOLL