

**IN THE DISTRICT COURT OF COMANCHE COUNTY
STATE OF OKLAHOMA**

FILED
DISTRICT COURT
COMANCHE COUNTY, OKLAHOMA
June 1, 2026 3:20 PM
ROBERT MORALES, COURT CLERK
Case Number CJ-2025-135

NEIL and LACY WEST,

Plaintiffs,

v.

STATE FARM FIRE AND CASUALTY
COMPANY and NANCY HOLCOMB INS.
AGENCY, INC.,

Defendants.

Case No. CJ-2025-135

**NOTICE OF SUBPOENAS TO PRODUCE AND PERMIT INSPECTION AND
COPYING OF DOCUMENTS**

Please take notice that, pursuant to 12 O.S. § 2004.1(C)(2), subpoenas will be served on **Arvest Bank**, c/o Registered Agent, Corporation Service Company, 10300 Greenbriar Place, Oklahoma City, Oklahoma 73159, and **Peak Appraisal Service, LLC** c/o Registered Agent, Michael L. Doyle, 818 H Street, P.O. Box 349, Elgin, Oklahoma 73538, to produce and permit inspection and copying of documents. Said inspection and copying will take place on June 17, 2026, at 10:00 a.m. in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102.

Arvest Bank and Peak Appraisal Service, LLC are directed, pursuant to 12 O.S. § 2004.1(A)(1)(b), to produce the documents listed on Exhibit A to the subpoenas served upon them. Copies of the subpoenas are attached hereto as Exhibits 1-2. The Subpoenas state that the witnesses need not appear in person, pursuant to 12 O.S. § 2004.1(C)(2)(a).

Respectfully Submitted,



TIMILA S. ROTHER, OBA #14310
PAIGE A. MASTERS, OBA #31142
AMANDA M. FINCH, OBA #34650
CROWE DUNLEVY

Braniff Building
324 North Robinson Avenue, Suite 100
Oklahoma City, Oklahoma 73102
(405) 235-7700
timila.rother@crowedunlevy.com
paige.masters@crowedunlevy.com
amanda.finch@crowedunlevy.com

**ATTORNEYS FOR DEFENDANT STATE
FARM FIRE AND CASUALTY COMPANY**

CERTIFICATE OF SERVICE

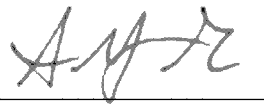
This is to certify that a true and correct copy of the above and foregoing was served by U.S. Mail, postage prepaid, this 1st day of June, 2026, to:

Reggie N. Whitten
Michael Burrage
Blake Sonne
Hannah Whitten
John S. Sanders
Jake Denne

WHITTEN BURRAGE

512 North Broadway Avenue, Suite 300
Oklahoma City, Oklahoma 73102

Brad W. Burgess
Colby A. Stephenson
BURGESS & HIGHTOWER LAW FIRM
21 NW 4th Street, Suite 201
Lawton, Oklahoma 73505



**IN THE DISTRICT COURT OF COMANCHE COUNTY
STATE OF OKLAHOMA**

NEIL and LACY WEST,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. CJ-2025-135
STATE FARM FIRE AND CASUALTY	)	
COMPANY and NANCY HOLCOMB INS.	)	
AGENCY, INC.,	)	
	)	
Defendants.	)	

**SUBPOENA TO ARVEST BANK TO PRODUCE AND PERMIT INSPECTION AND
COPYING OF DOCUMENTS**

TO: Arvest Bank
c/o Registered Agent, Corporation Service Company
10300 Greenbriar Place
Oklahoma City, Oklahoma 73159

GREETINGS - You are hereby commanded to produce and permit inspection and copying of documents in the possession, custody and control of Arvest Bank in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102 on June 17, 2026 at 10:00 a.m. You need not appear in person, pursuant to 12 O.S. § 2004.1(C) (2)(a). The documents which shall be produced are described on the attached Exhibit A.

In order to allow objections to the production of documents and things to be filed, you should not produce them until the date specified in this subpoena, and if an objection is filed, until the court rules on the objection.

Hereof fail not under penalty of law.

Issued this 1st day of June, 2026.



TIMILA S. ROTHER, OBA # 14310
PAIGE A. MASTERS, OBA #31142
AMANDA M. FINCH, OBA #34650
CROWE DUNLEVY
Braniff Building
324 North Robinson Avenue, Suite 100
Oklahoma City, Oklahoma 73102
(405) 235-7700
timila.rother@crowedunlevy.com

paige.masters@crowedunlevy.com
amanda.finch@crowedunlevy.com

**ATTORNEYS FOR DEFENDANT STATE
FARM FIRE AND CASUALTY COMPANY**

Exhibit A to Subpoena to Arvest Bank

- 1. Appraisals and Inspections:** All documents related to **any appraisals, inspections, or assessments** performed on the property located at 7 NW Briarcreek Drive, Lawton, Oklahoma 73505 (the “Property”), whether in connection with a **home equity line of credit (“HELOC”)** or other lending transaction secured by the Property involving Neil and/or Lacy West, including but not limited to:
 - a. The **appraisal reports, inspection reports, photographs, or notes** from any inspections or appraisals conducted for the purpose of evaluating or underwriting or issuing a HELOC secured by the Property.
 - b. Any **correspondence or communications** (including emails, letters, text messages, and internal notes) between the mortgage company and any third-party vendors, contractors, or professionals (such as appraisers or inspectors) related to the inspections or appraisals of the Property.

- 2. Mortgage-Related Documents:** Any documents, reports, or communications generated or received by the mortgage company in connection with the **home equity line of credit (“HELOC”)** secured by the Property involving Neil and/or Lacy West, including but not limited to:
 - a. The **HELOC application**, credit approval documents, and any documents reflecting the credit limit, available line, and any advances or draws, and documents reflecting the extension of a revolving line of credit secured by the Property related to the Property.
 - b. Any **valuation reports, repair estimates, or cost of repairs** documents provided or requested by the mortgage company as part of the **HELOC application, underwriting, or approval process**.
 - c. Any documents or communications regarding the **condition of the Property**, including but not limited to documents related to the Property’s **market value, condition, or repair history** obtained during the HELOC process.

- 3. Third-Party Communications:** All communications between the mortgage company and any third parties (including, but not limited to, contractors, appraisers, or public adjusters) regarding the condition of the Property or any repairs made to the Property as part of the HELOC process involving Neil and/or Lacy West, including but not limited to:
 - a. Emails, letters, or text messages concerning the condition of the Property or any inspections or repairs conducted before, during, or after the HELOC process.

- b. Any internal communications related to concerns about the condition of the Property, repairs, or valuation, which could impact the HELOC underwriting, approval, credit limit determination, or approval or terms of the line of credit (including any conditions or limitations placed on funding or use of the HELOC).

- 4. **Property-Related Reports:** Any third-party reports or documentation related to the condition of the Property during the HELOC process involving Neil and/or Lacy West, including but not limited to:
 - a. Insurance loss reports, repair estimates, or documentation related to prior damage or claims affecting the Property that were considered during the HELOC underwriting or approval process.

**IN THE DISTRICT COURT OF COMANCHE COUNTY
STATE OF OKLAHOMA**

NEIL and LACY WEST,

Plaintiffs,

v.

STATE FARM FIRE AND CASUALTY
COMPANY and NANCY HOLCOMB INS.
AGENCY, INC.,

Defendants.

Case No. CJ-2025-135

**SUBPOENA TO PEAK APPRAISAL SERVICE, LLC TO PRODUCE AND PERMIT
INSPECTION AND COPYING OF DOCUMENTS**

TO: Peak Appraisal Service, LLC
c/o Registered Agent, Michael L. Doyle
818 H Street
P.O. Box 349
Elgin, Oklahoma 73538

GREETINGS - You are hereby commanded to produce and permit inspection and copying of documents in the possession, custody and control of Peak Appraisal Service, LLC in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102 on June 17, 2026 at 10:00 a.m. You need not appear in person, pursuant to 12 O.S. § 2004.1(C) (2)(a). The documents which shall be produced are described on the attached Exhibit A.

In order to allow objections to the production of documents and things to be filed, you should not produce them until the date specified in this subpoena, and if an objection is filed, until the court rules on the objection.

Hereof fail not under penalty of law.

Issued this 1st day of June, 2026.



TIMILA S. ROTHER, OBA # 14310

PAIGE A. MASTERS, OBA #31142

AMANDA M. FINCH, OBA #34650

CROWE DUNLEVY

Braniff Building

324 North Robinson Avenue, Suite 100

Oklahoma City, Oklahoma 73102

(405) 235-7700

timila.rother@crowedunlevy.com
paige.masters@crowedunlevy.com
amanda.finch@crowedunlevy.com

**ATTORNEYS FOR DEFENDANT STATE
FARM FIRE AND CASUALTY COMPANY**

Exhibit A to Subpoena to Peak Appraisal Service, LLC

1. All documents, paper or electronic (including visual or audio recordings, photographs, etc.), relating to the house at 7 NW Briarcreek Drive, Lawton, Oklahoma 73505, now or previously owned and/or occupied by Neil and/or Lacy West (the “House”), and any inspections, estimates, evaluations, assessments, repairs, or other work or analysis by Peak Appraisal Service, or any related entity, of that House, and all communications with any person relating thereto.
2. All agreements and written communications of any kind, paper or electronic, including emails and text messages, with Neil and/or Lacy West or anyone acting on their behalf related to the House, to include hiring an attorney to represent them in recovering benefits for wind or hail damage under their State Farm policy or filing a lawsuit against State Farm, and all documents received from or provided to Neil and/or Lacy West or anyone acting on their behalf.
3. All written communications and agreements, paper or electronic, with Whitten Burrage, Burgess & Hightower Law Firm (“law firms”), or any of the lawyers from those firms, related to the House, or Neil and/or Lacy West (or anyone acting on their behalf), and all documents, including visual or audio recordings, photographs, etc., received from or provided to the law firms or lawyers relating to the House, or Neil and/or Lacy West (or anyone acting on their behalf).
4. All written communications, paper or electronic, including emails and text messages, with any homeowner, law firm, attorney, or legal representative, regarding hiring an attorney to represent a homeowner in recovering benefits for wind or hail damage under their insurance policy from January 1, 2022 to the present.