

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

FILED
DISTRICT COURT
COMANCHE COUNTY, OKLAHOMA
June 25, 2026 4:56 PM
ROBERT MORALES, COURT CLERK
Case Number CJ-2025-135

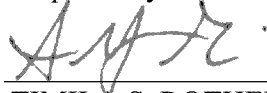
NEIL and LACY WEST,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	
	)	Case No. CJ-2025-135
STATE FARM FIRE AND CASUALTY	)	
COMPANY and NANCY HOLCOMB INS.	)	
AGENCY, INC.,	)	
	)	
Defendants.	)	

**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 **Darin Ray/REMAX Professionals**, 1701 Cache Road, Lawton, Oklahoma 73507, **Fortney Fence Co. LLC** c/o Registered Agent, Russell Fortney, 1719 NW Ash Avenue, Lawton, Oklahoma 73507, and **Rocket Mortgage, LLC**, c/o Registered Agent, C T Corporation System, 1833 South Morgan Road, Oklahoma City, Oklahoma 73128, to produce and permit inspection and copying of documents. Said inspection and copying will take place on July 13, 2026, at 10:00 a.m. in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102.

Darin Ray/REMAX Professionals, Fortney Fence, and Rocket Mortgage 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 1-3. 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 25th 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 44th Street, Suite 201

Lawton, Oklahoma 73505



Exhibit 1

**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 DARIN RAY/REMAX PROFESSIONALS TO PRODUCE AND
PERMIT INSPECTION AND COPYING OF DOCUMENTS**

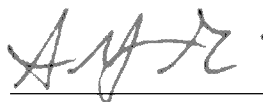
TO: Darin Ray/REMAX Professionals
1701 Cache Road
Lawton, Oklahoma 73507

GREETINGS - You are hereby commanded to produce and permit inspection and copying of documents in the possession, custody and control of Darin Ray/REMAX Professionals in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102 on July 13, 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 25th day of June, 2026.



TIMILA S. ROTHER, OBA # 14310

PAIGE A. MASTERS, OBA #31142

AMANDA M. FINCH, OBA #34650

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

Exhibit A to Subpoena to Darin Ray/REMAX Professionals

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 Darin Ray/REMAX Professionals, 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.

Exhibit 2

**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 FORTNEY FENCE CO. LLC TO PRODUCE AND PERMIT
INSPECTION AND COPYING OF DOCUMENTS**

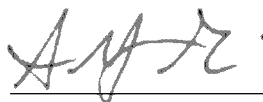
TO: Fortney Fence Co. LLC
c/o Registered Agent, Russell Fortney
1719 NW Ash Avenue
Lawton, Oklahoma 73507

GREETINGS - You are hereby commanded to produce and permit inspection and copying of documents in the possession, custody and control of Fortney Fence Co. LLC in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102 on July 13, 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 25th day of June, 2026.



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

Exhibit A to Subpoena to Fortney Fence Co. 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 Fortney Fence, 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.

Exhibit 3

**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 ROCKET MORTGAGE, LLC TO PRODUCE AND PERMIT
INSPECTION AND COPYING OF DOCUMENTS**

TO: Rocket Mortgage, LLC
c/o Registered Agent, C T Corporation System
1833 South Morgan Road
Oklahoma City, Oklahoma 73128

GREETINGS - You are hereby commanded to produce and permit inspection and copying of documents in the possession, custody and control of Rocket Mortgage, LLC in the offices of Crowe Dunlevy, 324 North Robinson Avenue, Suite 100, Oklahoma City, Oklahoma 73102 on July 13, 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 25th day of June, 2026.



TIMILA S. ROTHER, OBA # 14310

PAIGE A. MASTERS, OBA #31142

AMANDA M. FINCH, OBA #34650

CROWE DUNLEVY

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

Exhibit A to Subpoena to Rocket Mortgage, LLC

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.