

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

FILED

DISTRICT COURT

OKLAHOMA COUNTY, OKLAHOMA

October 6, 2026 2:04 PM

RICK WARREN, COURT CLERK

Case Number CJ-2025-2626

BILLY and LACY HURSH,

Plaintiffs,

v.

STATE FARM FIRE AND CASUALTY
COMPANY; MARK D. WELTY; and
MARK D. WELTY INSURANCE AGENCY, INC.,

Defendants.

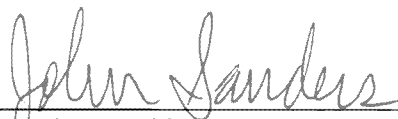
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Case No.: CJ-2025-2626

NOTICE OF DEPOSITION SUBPOENA AND SUBPOENA DUCES TECUM

Please take notice, pursuant to 12 O.S. §§ 2004.1 and 3230, Plaintiffs Billy and Lacy Hursh, will take the deposition of Mark Caylao, upon oral examination at Professional Reporters, 20 E 5th St #720, Tulsa, OK 74103, on October 20, 2026, at 9:30 a.m. The deposition will be recorded stenographically before an officer authorized by the law to take depositions and administer oaths and may be videotaped. You are invited to attend and cross-examine. A copy of the Deposition Subpoena and Subpoena Duces Tecum is attached.

Respectfully submitted,



Reggie N. Whitten, OBA No. 9576

Michael Burrage, OBA No. 1350

Blake Sonne, OBA No. 20341

Hannah Whitten, OBA No. 35261

John S. Sanders, OBA No. 34990

Jake Denne, OBA No. 35097

WHITTEN BURRAGE

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Oklahoma City, OK 73102

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hwhitten@whittenburrage.com
jsanders@whittenburrage.com
jdenne@whittenburrage.com
Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

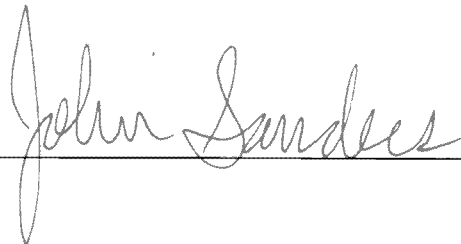
I hereby certify that on October ⁶/₂, 2026, a true, correct, and exact copy of the foregoing document was emailed and/or mailed to the following persons:

Carrie McNeer
Grant A. Fitz
GABLEGOTWALS
110 N. Elgin Avenue
Suite 200
Tulsa, OK 74120-1490
918.595.4800
918.595-4990
cmcneer@gablelaw.com
gfitz@gablelaw.com

-and-

Lance E. Leffel
GABLEGOTWALS
BOK Park Plaza
499 W. Sheridan Ave. Suite 2200
Oklahoma City, OK 73102
lleffel@gablelaw.com
405.235.5500
405.235-2875 (fax)

ATTORNEYS FOR DEFENDANTS



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

BILLY & LACY HURSH,

Plaintiffs,

v.

**STATE FARM FIRE AND
CASUALTY COMPANY; MARK D.
WELTY; and MARK D. WELTY
INSURANCE AGENCY, INC.,**

Defendants.

Case No. CJ-2025-2626
Honorable Amy Palumbo

DEPOSITION SUBPOENA AND SUBPOENA DUCES TECUM

TO: MARK CAYLAO
228 S COLLEGE AVE
TULSA, OK 74104-2122

GREETINGS:

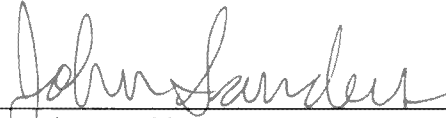
Pursuant to 12 O.S. § 2004.1, YOU ARE HEREBY COMMANDED to appear and give testimony in the above-captioned matter on October 20, 2026, at 9:30 a.m. at the offices of Professional Reporters, 20 E 5th St #720, Tulsa, OK 74103. The deposition will be recorded stenographically before an officer authorized by the law to take depositions and administer oaths. The deposition may be recorded by a videographer. The deposition will continue from business day to business day, until completed.

You are also commanded to bring with you to the deposition and make available for copying and inspection all documents listed in Exhibit A attached hereto.

HEREOF FAIL NOT, UNDER PENALTY OF LAW.

Issued by the undersigned attorney as an authorized officer of the Court:

Respectfully submitted,



Reggie N. Whitten, OBA No. 9576

Michael Burrage, OBA No. 1350

Blake Sonne, OBA No. 20341

Hannah Whitten, OBA No. 35261

John S. Sanders, OBA No. 34990

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Attorneys for Plaintiffs

CERTIFICATE OF MAILING

I hereby certify that on the 2nd day of October 2026, a true and correct copy of the above and foregoing pleading was mailed, postage prepaid, to the following, to-wit:

Carrie McNeer
Grant A. Fitz
GABLEGOTWALS
110 N. Elgin Avenue, Suite 200 Tulsa, OK 74120-1490
(918) 595-4800
(918) 595-4990 (fax)
cmcneer@gablelaw.com
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-and-

Lance E. Leffel GABLEGOTWALS
BOK Park Plaza
499 W. Sheridan Ave., Suite 2200 Oklahoma City, OK 73102
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ATTORNEYS FOR DEFENDANTS

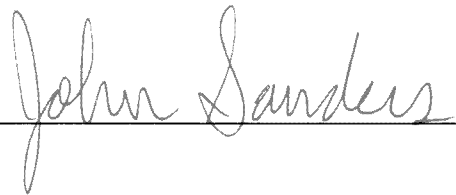


EXHIBIT A

1. Your entire file pertaining to Billy and Lacy Hursh ("Plaintiffs"), including but not limited to notes, interviews, memoranda, and other materials reviewed, considered or relied upon in preparing your expert report and opinions submitted in support of the captioned lawsuit, and any other non-privileged and discoverable documents in your file for this case;
2. All reports authored by you, or any of your employees or agents, pertaining to Plaintiffs;
3. All billing records, time sheets, invoices, receipts, costs, and payments relating to your work in this matter;
4. All documents relating to any contract between you and Defendant State Farm, and/or State Farm's counsel relating to your work in this matter;
5. Any exhibits or demonstratives you intend to use to support or illustrate your opinions or testimony; and
6. All communications with Defendant State Farm and/or State Farm's attorneys regarding: (1) compensation for your study or testimony; (2) identification of facts or data that State Farm's attorney or State Farm provided and that you considered in forming the opinions to be expressed; or (3) identification of assumptions that State Farm's attorney or State Farm provided and that you relied upon in forming the opinions to be expressed.