



FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

AUG 28 2024

RICK WARREN  
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IN THE DISTRICT COURT OF OKLAHOMA COUNTY  
STATE OF OKLAHOMA

OKLAHOMA DEPARTMENT OF SECURITIES, )  
*ex rel.* MELANIE HALL, ADMINISTRATOR, )

Plaintiff, )

v. )

RABIH KALIDY, INDIVIDUALLY, )

Defendant. )

CJ-2024-3782  
Judge Richard Ogden

**OBJECTION TO PLAINTIFF’S SUBPOENA ON AMANDA KALIDY,  
MOTION TO QUASH AND  
MOTION FOR PROTECTIVE ORDER.**

COMES NOW the Defendant, Rabih Kalidy, by and through his specially entered attorney of record Dawn M. Williams and pursuant to 12 O.S. §2004.1 (C)(3)(a), respectfully submits this Objection to Petitioner’s Subpoena Duces Tecum upon Amanda Kalidy, Motion to Quash and Motion for Protective Order, and states as follows:

1. Amanda Kalidy is a non-party in the above-styled case.
2. On or about August 15, 2024, Plaintiff issued a Subpoena upon Amanda Kalidy requiring Mrs. Kalidy to appear and produce live testimony against her husband, the Defendant, Rabih Kalidy. (See Subpoena Duces Tecum, attached hereto as Exhibit “A”)
3. Mr. Kalidy objects to the Subpoena pursuant to 12 O.S. §2004.1 (C)(3)(a)(3), (4) said request requires the disclosure of privileged and confidential information regarding her husband.
4. 12 O.S. §2004.1 (C) expressly places a duty upon the party or attorney issuing a subpoena to take reasonable steps to avoid imposing an undue burden or expense on a person subject to that subpoena. Amanda Kalidy is the wife of Rabih Kalidy, any testimony that may be

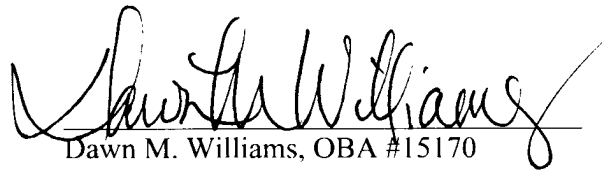
elicited from her will impose an undue burden on her as his wife. Further, her having to take off work for a day or more to do so will cause an undue expense.

5. This request places an undue burden upon Amanda Kalidy as a non-party. 12 O.S. §2504 (A). A communication is confidential for the purposes of this section if it is made privately by any person to the person's spouse and is not intended for disclosure to any other person.

6. Plaintiff is seeking to drag Amanda Kalidy before this honorable Court, in a matter which Amanda Kalidy is not a party to, in an effort to harass Amanda Kalidy and the Defendant. This subpoena is a blatant fishing expedition by Plaintiff to obtain information. A long line of decisions informs us that the duty to avoid undue burden on person/entity subject to a subpoena exists in all situations and that duty is higher when the subpoena is directed to a non-party. *Young v. Macy*, 21 P.3d 44 (Okla. 2001)

WHEREFORE, Rabih Kalidy, respectfully requests that the Court quash Plaintiff's Subpoena to Amanda Kalidy and for all other relief to which Mr. Kalidy may be by law entitled, including reasonable attorney fees and costs.

Respectfully submitted,



Dawn M. Williams, OBA #15170

WHITBECK|BENNETT, PLLC

2201 N. Classen Blvd.

Oklahoma City, Oklahoma 73106

Telephone: (405) 655-5733

dwilliams@wblaws.com

*Specially Appointed*

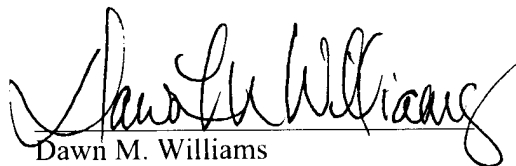
*Attorneys for Defendant.*

## CERTIFICATE OF DELIVERY

I certify that on the date of filing, a true and correct copy of the above and foregoing was delivered via email and/or mail to the following:

Bradley E. Davenport  
Amanda M. Commesser  
Oklahoma Department of Securities  
204 N. Robinson Ave, Ste 400  
Oklahoma City, Oklahoma 73102  
[bdavenport@securities.ok.gov](mailto:bdavenport@securities.ok.gov)  
[acommesser@securities.ok.gov](mailto:acommesser@securities.ok.gov)

Grady Conrad  
330 N.W. 13<sup>th</sup> Street  
Oklahoma City, Oklahoma 73103  
[grady@kenkling.com](mailto:grady@kenkling.com)



Dawn M. Williams