

**FILED**

**JUN 21 2021**

**COURT OF THE JUDICIARY**  
**Rebecca C. Oates**  
**Secretary**

**IN THE ALABAMA COURT OF THE JUDICIARY**

**IN THE MATTER OF:**

**JOHN RANDALL "RANDY" JINKS  
PROBATE JUDGE OF  
TALLADEGA COUNTY**

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**CASE NO. 57**

**MOTION FOR APPOINTMENT OF LEGAL COUNSEL**

COMES NOW D.P., (as designated in the March 3, 2021 Complaint filed in this matter), by and through legal counsel, Laura S. Gibson and Stephen R. Arnold with the law firm White Arnold & Dowd P.C., and, pursuant to Rule 12 of the Rules of Procedure for the Alabama Court of the Judiciary, respectfully requests the court appoint Laura S. Gibson and Stephen R. Arnold to represent D.P. in this matter and in support of this request states:

1. D.P. is a necessary witness in this matter and as such has been and will be materially affected by these proceedings. D.P. is presumably identified in pleadings filed under seal and is, therefore identified to the Court.
2. The Complaint filed herein on March 3, 2021 states facts in support of the Judicial Inquiry Commission's allegations against Randy Jinks and specifically names D.P. as witness to those allegations on pages 3, 4, 9, 11, 12, 13, 14, 15, 19, 20, 25, 28, 31 and 46 of the Complaint.
3. On or about March 18, 2021, Randy Jinks appeared for a televised interview on "Daybreak Live" (<https://www.youtube.com/watch?v=KNPYUonwOC0>) during which he generally referenced D.P. in an negative manner.
4. On April 28, 2021, Randy Jinks filed his Answer and Denial in which he specifically referenced D.P. on pages 3, 8, 9, 10, 13 and 27. Additionally, Jinks denied allegations in the Complaint involving D.P. without specifically naming this witness.
5. On Saturday, June 19, 2021, D.P. was served with a subpoena filed by counsel for Jinks to appear and produce documents for deposition set this coming Wednesday, June 23, 2021 at 12:30 p.m. D.P. has been given effectively only three days advance notice which includes a weekend.
6. D.P. is and will be materially affected by the proceedings in his employment, his standing in the community and his general reputation and is immediately in need of legal counsel to advise and protect him at each and every phase of these proceedings.

7. Upon being appointed, legal counsel will immediately file Notices of Appearance and a Motion for Protective Order regarding the June 22, 2021 deposition, copies of which are attached hereto.

Respectfully requested this 21<sup>st</sup> day of June, 2021.

/s/ Laura S. Gibson  
Laura S. Gibson  
Attorney for D.P.  
White Arnold & Dowd P.C.  
2025 Third Ave. North, Ste. 500  
Birmingham, AL 35203  
Telephone: (205) 323-1888  
Facsimile: (205) 323-8907  
[Lgibson@whitearnolddowd.com](mailto:Lgibson@whitearnolddowd.com)

/s/ Stephen R. Arnold  
Stephen R. Arnold  
Attorney for D.P.  
White Arnold & Dowd P.C.  
2025 Third Ave. North, Ste. 500  
Birmingham, AL 35203  
Telephone: (205) 323-1888  
Facsimile: (205) 323-8907  
[steve@whitearnolddowd.com](mailto:steve@whitearnolddowd.com)

**CERTIFICATE OF SERVICE**

I hereby certify that I have on this 21<sup>st</sup> day of June, 2021, electronically filed the foregoing with the Court of the Judiciary, and that I have further served a copy upon the following parties, electronically and/or by placing same in the United States Mail, postage prepaid and properly addressed as follows:

Elizabeth C. Bern  
Alabama Judicial Inquiry Commission  
P.O. Box 303400  
Montgomery, Alabama 36130-3400  
[elizabeth.bern@jic.alabama.gov](mailto:elizabeth.bern@jic.alabama.gov)

Amanda Hardy  
AMANDA HARDY LAW, LLC  
1620 Tara Dr.  
Columbiana, Alabama 35051  
[amandahardylaw@gmail.com](mailto:amandahardylaw@gmail.com)

Amanda Hardy  
P.O. Box 474  
Alexander City, Alabama 35011  
[amandahardylaw@gmail.com](mailto:amandahardylaw@gmail.com)

/s/ Laura S. Gibson