

FILED

JUN 21 2021

IN THE ALABAMA COURT OF THE JUDICIARY

COURT OF THE JUDICIARY
Rebecca C. Oates
Secretary

IN THE MATTER OF:

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JOHN RANDALL "RANDY" JINKS
PROBATE JUDGE OF
TALLADEGA COUNTY

CASE NO. 57

MOTION FOR APPOINTMENT OF LEGAL COUNSEL

COMES NOW T.D., (as designated in the Complaint filed in this matter on March 3, 2021), 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 T.D. in this matter and in support of this request states:

1. T.D. is a necessary witness in this matter and as such has been and will be materially affected by these proceedings. T.D. 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 T.D. as witness to those allegations on pages 3, 4, 9, 10, 11, 15, 17, 18, 19, 20, 21, 27, 30, 31, 32, 46 and 72 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 T.D. in a negative manner.

4. On April 28, 2021, Randy Jinks filed his Answer and Denial in which he specifically referenced T.D. on pages 2, 11, 39, 40 and 41. Additionally, Jinks denied allegations in the Complaint involving T.D. without specifically naming this witness.

5. On the afternoon of Friday, June 18, 2021, which was a federal holiday, T.D. was served with a subpoena filed by counsel for Jinks to appear and produce documents for deposition set for this coming Wednesday, June 23, 2021 at 9:30 a.m. T.D. has been given effectively only four days advance notice which includes a weekend.

6. T.D. is and will be materially affected by the proceedings in her employment, her standing in the community and her general reputation and is immediately in need of legal counsel to advise and protect her 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 21st day of June, 2021.

/s/ Laura S. Gibson

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/s/ Stephen R. Arnold

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CERTIFICATE OF SERVICE

I hereby certify that I have on this 21st 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:

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/s/ Laura S. Gibson