

8676 S. Murphree Dr.  
Broken Arrow, OK 74014  
November 7, 2012

The Honorable Judge Daman Cantrell  
Tulsa County District Court  
500 S. Denver  
Tulsa, OK 74103

  
\* 1 0 2 0 1 0 2 5 9 4 \*

**DISTRICT COURT  
FILED**

NOV 16 2012

SALLY HOWE SMITH, COURT CLERK  
STATE OF OKLA. TULSA COUNTY

Dear Judge

I am a former board member of Broken Arrow Public Schools and as such was subpoenaed for a deposition in the lawsuit of Dr. Jim Sisney against the District and other board members. (CJ-2008-6173) I was called as a witness for the District, but was treated as a hostile witness because I had voted to retain rather than fire Dr. Sisney. Because I had been subjected to extremely hostile treatment by attorney's from Rosenstein, Fist and Ringold while still a board member, I was not comfortable giving a deposition without legal representation. I requested that the District provide me with representation, but they refused, with the explanation that I was only there as a factual witness and that Rosenstein, Fist and Ringold, as the law firm of the District, would represent me. This left me in a position of having to retain representation at my own expense.

I am not part of the lawsuit. I was simply an unpaid board member who tried to make decisions based on the best interests of the children and public in the Broken Arrow School District. Inasmuch as I was simply acting in accordance with my duties as a duly elected board member, it does not seem right to me that I should have to incur legal bills in excess of \$2400 just to protect myself from predatory attorneys. In fact, I was very relieved to have someone looking out for my interests when a deposition that I thought would be 2 to 3 hours turned into two days and more than 10 hours of extremely aggressive questioning by Mr. Rainey of RFR. It was obvious that his goal was to twist my words, or trick me into saying something that would impair my integrity or implicate me in illegal actions.

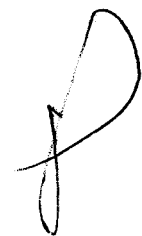
I am respectfully requesting that Broken Arrow School District be directed to pay for my legal representation. Attached are copies of the bills from my attorneys.

Thank you for taking the time to consider this matter.

Sincerely,

  
Stephanie J. Updike

Enclosures



# BULLEIGH LAW FIRM

2444 West New Orleans, Ste 2500  
Broken Arrow, Oklahoma 74012  
Main Phone: (918) 994-2794  
Website: [www.bulleighlaw.com](http://www.bulleighlaw.com)

STATEMENT OF ACCOUNT

Prior Balance	0.00
Payment & adjustments	0.00
Current Fees	1,605.00
Current Expenses	0.00
Current payment	0.00

COPY

TOTAL AMOUNT DUE

\$1,605.00

**THIS INVOICE IS PAYABLE UPON RECEIPT**

Please reference the Matter Number and Invoice Number with your remittance.

**Mail Remittance to:**

**Bulleigh Law Firm, PLLC**  
2444 West New Orleans  
Suite 2500  
Broken Arrow, OK 74012

# BULLEIGH LAW FIRM

2444 West New Orleans, Ste 2500  
Broken Arrow, Oklahoma 74012  
Main Phone: (918) 994-2794  
Website: www.bulleighlaw.com

Stephanie Updike  
OK

Date: Saturday, September 01, 2012

File Number: 1417/002

Invoice Number: 1858

Re: Deposition

Date	INIT.	Description of Service	Hours	Amount
Aug 10/12	JAB	Conference with client regarding scheduled deposition.	0.80	148.00
Aug 13/12	JAB	Phone calls to attorneys for Broken Arrow School District and Jim Sisney.	0.30	55.50
Aug 14/12	JAB	Travel to and from downtown for deposition (reduced travel rate).	1.00	125.00
Aug 14/12	JAB	Attend Deposition with client.	6.50	1,202.50
Aug 15/12	JAB	Phone call with client and send notice of potential deposition date to attorney for Broken Arrow School District.	0.20	37.00
Aug 31/12	JAB	Phone call to client regarding rescheduled deposition.	0.20	37.00
		Our Fee	9.00	<u>\$1,605.00</u>
Time Summary				
Lawyer Initials	Rate	HRS	Amount	
JAB	125.00	1.00	125.00	
JAB	185.00	8.00	1,480.00	

TOTAL NEW CHARGES

\$1,605.00

*pd 9-12-12*  
*ch# 7845*

# BULLEIGH

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## LAW FIRM

2444 West New Orleans, Ste 2500  
 Broken Arrow, Oklahoma 74012  
 Main Phone: (918) 994-2794  
 Website: www.bulleighlaw.com

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### STATEMENT OF ACCOUNT

Prior Balance	1,605.00
Payment & adjustments	-1,605.00
Current Fees	846.50
Current Expenses	0.00
Current payment	0.00

**COPY**

TOTAL AMOUNT DUE

\$846.50

### PAYMENT & ADJUSTMENTS

Date	Description	Amount
Sep 14/12	Payment	1,605.00

### THIS INVOICE IS PAYABLE UPON RECEIPT

**Please reference the Matter Number and Invoice Number with your remittance.**

### Mail Remittance to:

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**Bulleigh Law Firm, PLLC**  
 2444 West New Orleans  
 Suite 2500  
 Broken Arrow, OK 74012

# BULLEIGH

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## LAW FIRM

2444 West New Orleans, Ste 2500  
Broken Arrow, Oklahoma 74012  
Main Phone: (918) 994-2794  
Website: www.bulleighlaw.com

Stephanie Updike  
OK

Date: Saturday, September 29, 2012

File Number: 1417/002

Invoice Number: 1888

Re: Deposition

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Date	INIT.	Description of Service	Hours	Amount
Sep 12/12	JAB	Phone call with Attorney for Jim Sisney regarding deposition.	0.10	18.50
Sep 12/12	JAB	Review Updike affidavit.	0.20	37.00
Sep 12/12	JAB	Phone call with Stephanie Updike regarding deposition.	0.30	55.50
Sep 17/12	JAB	Travel to and from deposition at Rosenstein law firm (Reduced Fee).	1.00	125.00
Sep 17/12	JAB	Attend deposition of Stephanie Updike.	3.30	610.50
		Our Fee	4.90	<u>\$846.50</u>
<b>Time Summary</b>				
Lawyer Initials	Rate	HRS	Amount	
JAB	125.00	1.00	125.00	
JAB	185.00	3.90	721.50	
<b>TOTAL NEW CHARGES</b>				<u>\$846.50</u>

IN THE DISTRICT COURT OF TULSA COUNTY  
STATE OF OKLAHOMA

COPY

JIM SISNEY, )  
)  
Plaintiff, )  
)  
vs. )  
)  
MARYANNE FLIPPO, )  
SHARI WILKINS, )  
SHARON WHELPLEY, as individuals )  
and in their official capacities as )  
Members of the Broken Arrow )  
Public School Board of Education, )  
AND )  
INDEPENDENT SCHOOL DISTRICT )  
NO. 3 of TULSA COUNTY, )  
)  
Defendants. )

Case No. CJ-2008-6173  
Judge Daman Cantrell

SUBPOENA – DEPOSITION

THE STATE OF OKLAHOMA TO:

Stephanie Updike  
8676 S Murphree Dr.  
Broken Arrow, OK 74014

**GREETINGS:**

You are hereby commanded to appear at the offices of Rosenstein, Fist & Ringold, 525 South Main, Suite 700, Tulsa, Oklahoma 74103, on the 14<sup>th</sup> day of August, 2012, at 10:00 a.m. to testify by deposition as a witness at the request of the defendant Broken Arrow School District. Your testimony will be recorded stenographically and by video.

**You should not fail to appear unless excused by the Court under penalty of law. Failure to obey this subpoena may be punishable as provided for by law.**



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Tulsa County Court Clerk or  
Attorney Issuing Subpoena

**Issued by:**

Kent B. Rainey, OBA No. 14619  
ROSENSTEIN, FIST & RINGOLD  
525 S. Main, Suite 700  
Tulsa, OK 74103  
(918) 585-9211  
borainey@rfrlaw.com  
Attorneys for the Broken Arrow School District