UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF KENTUCKY
LOUISVILLE DIVISION

Consumer Financial Protection Bureau Plaintiff	)	
v.	)	Civil Action No. 3:13CV-1047-H
Borders & Borders, PLC, et al. Defendants	)	

OBJECTIONS TO SUBPOENA

Comes the objecting party, My Kentucky Home LLC d/b/a Keller Williams Realty – Louisville Highlands ("My Kentucky Home"), by counsel, and hereby makes the following objections to the subpoena of the Consumer Financial Protection Bureau:

Counsel for My Kentucky Home states a continuing objection to the Instructions and Definitions contained in the subpoena to the extent they seek to alter or amend the requirements of Fed. R. Civ. P. 45. Counsel will endeavor to comply with the rule and spirit of Rule 45 in objecting and responding to the subpoena.

Counsel for My Kentucky Home objects to the subpoena on the grounds that the requests therein are overly broad, unlimited in scope, and unduly burdensome. In order to comply with the requests the subpoenaed party would require a list of pertinent transactions, including the last name of the buyer or seller and the complete address of the subject property. My Kentucky Home's files are stored in boxes in an off-site storage facility, and it is possible to retrieve specific files. However, it would be unduly burdensome to sift through the thousands of stored files to check and see if each file meets the criteria set forth in the subpoena.

Counsel for My Kentucky Home further objects to the subpoena and otherwise adopts and incorporates by reference the Motion to Limit Discovery and Memorandum in Support thereof filed by the Defendants.

Respectfully submitted,

/s/ James P. Grohmann
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Counsel for My Kentucky Home LLC d/b/a Keller Williams Realty – Louisville Highlands

CERTIFICATE OF SERVICE

It is hereby certified that a true and accurate copy of the foregoing was served, via electronic service, this 7th day of May, 2014, on:

Kirsten Ivey-Colson
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Counsel for defendants

/s/ James P. Grohmann
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