

EXHIBIT B

DISTRICT COURT, ALAMOSA COUNTY, COLORADO, 8955 Independence Way Alamosa, CO 81101	DATE FILED June 25, 2026 3:55 PM
THE PEOPLE OF THE STATE OF COLORADO Plaintiff, v. BARRY LEE MORPHEW, Defendant.	▲ COURT USE ONLY ▲
JANE FISHER-BYRIALSEN, #49133 FISHER & BYRIALSEN, PLLC 4600 S. Syracuse Street, 9 th Floor Denver, CO 80237 (202)256-5664 Jane@fblaw.org DAVID BELLER, #35767 RECHT KORNFELD, P.C. 1600 Stout Street, Suite 1400 Denver, CO 80202 (303)573-1900 Fax: (303) 446-9400 david@rklawpc.com	Case Number: 25 CR 128
SUBPOENA DUCES TECUM	

TO: Cellco Partnership

dba: Verizon Wireless

Verizon Security Assistance Team (VSAT)

Attn: Custodian of Records

One Verizon Way

Basking Ridge, NJ 07920

YOU ARE COMMANDED TO APPEAR in the DISTRICT COURT of ALAMOSA COUNTY, located at 8955 Independence Way, Alamosa, CO 81101 for the SUBPOENA RETURN, on July 6, 2026, at 9:00 a.m., and you must remain until released by the Court. **Failure**

by any person without adequate excuse to obey a subpoena served upon him/her may be deemed in contempt of the court from which the subpoena issued. C.R.S., Rule 17(h). And you are to produce at this time and place:

All records associated with the mobile number (317) 339-5280 from the dates of January 1, 2020 through June 3, 2020 (in the alternative whatever data is available during that time frame), in unredacted, .xsl and/or .csv formats, specifically including, but not limited to:

1. Specialized Location Records: All call, voice, text (SMS & MMS), and data connection location information and transactions (registration of network events), related to all specialized carrier records that may be referred to as NELOS (Network Event Location System), RTT (Round Trip Time/Return Trip Time/Real Time Tool), PCMD (Per Call Measurement Data), TDOA (Time Difference of Arrival) or Timing Advance Information, Mediation Records, E9-1-1, and/or Historical GPS/Mobile Locate Information which shows GPS location (longitude and latitude) and Cell-Site and sector of the device in relationship to the network when connected to the network for the above referenced Number.

2. Call/Text/Data Detail Records: All records associated with the identified mobile number (317) 339-5280, also to include all numbers that communicate with this listed number relating to all delivered and undelivered inbound and outbound calls, text messages, and text message content to any of the above listed numbers, all voice mail, and all data connections from January 1, 2020 through June 3, 2020 (in the alternative whatever data is available during that time frame), and to include Cell-site and sector, date, time, direction, duration, number called or text to and/or received from, and bytes up/down, information related to each call, text or data connection, all text message content, and voicemails, as well as Call to Destination/Dialed Digits search for all numbers listed above. Please preserve all cell-site and sector information related to each call, text or data connections.

3. Carrier Key related to call detail, text messages, data connections, IP logs, IP Sessions, web site and/or application connections, and cell site information.

4. Cell Site List(s): List of all cell-sites as of January 1, 2020 through June 3, 2020 for all state(s) in which the above records used cell locations. Cell site lists to include switch, cell-site number, name, physical address, longitude and latitude, all known vertical beam coverage and known horizontal beam coverage, all sectors associated with each cell-site, azimuth, and beamwidth of each related sector. If multiple technologies (CDMA, UMTS, GSM, LTE etc.) are referenced in the records, all appropriate corresponding cell site lists will also be provided.

5. Subscriber Records: All information for the following mobile number (317) 339-5280 including: all Subscriber information to include name, physical address, mailing addresses, residential addresses, business addresses, e-mail addresses and any other address information.

6. A copy of law enforcement's non-disclosure agreement with Verizon in this case, as referenced in the attached April 22, 2022 email from VSAT legal analyst Matthew Griffin.

7. A reproduction of all material provided to law enforcement with respect to the above listed number. The attached email from April 22, 2022 indicates that records were produced to law enforcement agencies for the above listed phone number. To the extent that **any** material not covered by the enumerated requests above was provided to law enforcement, those materials are hereby demanded.

8. Copies of all written and recorded communications between Verizon and any law enforcement agency or officer in connection with the above listed phone number.

The requested documents can be emailed directly to the Court on or before 9:00 a.m on July 6, 2026 at amanda.hopkins@judicial.state.co.us or mailed to the address listed above for the Court in lieu of personal appearance. Subpoenaed documents are reviewed by the Judge prior to any release to the parties.

Dated this 25th day of June, 2026.

FISHER & BYRIALSEN, PLLC

/s/ Jane Fisher-Byrialsen

Jane Fisher-Byrialsen, #49133

RECHT KORNFELD, P.C.

/s/ David Beller

David Beller, #35767



Rachel Roberts [REDACTED]

VSAT original record?

[REDACTED]
To: Rachel Roberts [REDACTED]

Fri, Apr 22, 2022 at 4:34 PM

Good Evening Ms. Roberts.

You can provide a separate subpoena for records, with an authorization signed by your client who is also the account holder, but the records that would be produced are not going to be reproductions of the records previously provided to law enforcement as we are bound by non-disclosure for those requests.

I conferred with a few colleagues and what we might require to release the information provided previously to LEA is an order from the judge that specifically mandates that we break non-disclosure and reproduce the records that originally were sent to the LEA in regards to the legal process they submitted.

On Monday I can confirm with my supervisor and our legal counsel what would be required definitively for us to release a reproduction of records and at that point when I have more info I will reach out.

Thank you.

-Matthew Griffin

Subpoena Compliance Department

Legal Analyst – VSAT

Verizon Security Assistance Team

verizon✓

Phone: 800-451-5242 Option 1

Fax: 888-667-0028

180 Washington Valley Rd
Bedminster NJ, 07921

From: Rachel Roberts [mailto:[REDACTED]]
Sent: Friday, April 22, 2022 3:48 PM
To: Griffin, Matthew William Henry <[REDACTED]>
Subject: Re: [E] VSAT original record?