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FILED  
THIRD DISTRICT COURT  
07 MAY 22 PM 4:14  
SALT LAKE DEPARTMENT  
BY \_\_\_\_\_  
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Attorneys for Bruce R. Wisan, as the Court-Appointed  
Special Fiduciary of the United Effort Plan Trust

IN THE THIRD JUDICIAL DISTRICT COURT OF SALT LAKE COUNTY  
STATE OF UTAH

IN THE MATTER OF THE UNITED EFFORT  
PLAN TRUST,(Dated November 9, 1942,  
Amended April 10, 1946, and Amended and  
Restated on November 3, 1998); and its,  
TRUSTEES, including known trustees  
TRUMAN BARLOW, WARREN JEFFS,  
LEROY JEFFS, WINSTON BLACKMORE,  
JAMES ZITTING and WILLIAM E. JESSOP  
a/k/a WILLIAM E. TIMPSON and DOE  
TRUSTEES I THROUGH IX.

**MOTION TO COMPEL  
COMPLIANCE WITH SUBPOENAS**

Civil No. 053900848

Judge Denise P. Lindberg

Bruce R. Wisan (the “Special Fiduciary”), as Court-Appointed Special Fiduciary of the United Effort Plan Trust (the “UEP” or the “trust”), by and through counsel and pursuant to UTAH R. Civ. P. 45(c)(2)(C), moves for an order compelling compliance with Subpoenas served upon Warren S. Jeffs, Walter F. Bugden, Jr., Tara Isaacson, and Bugden & Isaacson, LLC (collectively, the “Jeffs Parties”), by ordering each of the Jeffs Parties to produce all of the documents described

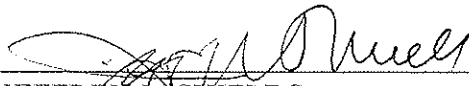
in each of the relevant Subpoenas within ten (10) days of the entry of the order granting this Motion to Compel.

The basis of this motion is that the Jeffs Parties are in the possession, custody, and control of information and documents relevant to the Special Fiduciary's investigation and management of UEP property.

This motion is supported by a Memorandum in Support filed concurrently herewith.

DATED this 2<sup>nd</sup> day of May, 2007.

CALLISTER NEBEKER & McCULLOUGH

  
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JEFFREY L. SHIELDS  
*Attorneys for Bruce R. Wisan, Special Fiduciary*

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing **MOTION TO COMPEL COMPLIANCE WITH SUBPOENAS** was served by United States mail, first class postage prepaid, on the 27<sup>th</sup> day of May 2007, on the following:

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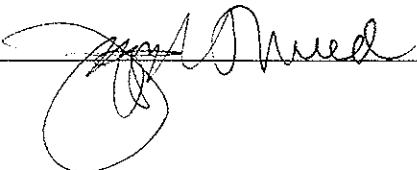
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