

The Respondents are the Loudoun County Board of Supervisors (the “Board”) and Loudoun County (the “County”).

2. Fleming P.C. is a private law firm incorporated as a professional corporation under the laws of the Commonwealth of Virginia. Its principal place of business is 107 East Market Street, Leesburg, Virginia. Fleming P.C. provides legal services to individual and corporate clients. In the course and scope of its attorney-client relationship with Loudoun Hospital Center and its affiliated entities, Fleming P.C. provided legal advice on a variety of subjects, including operational strategy and planning, and land use matters and policy. Fleming P.C. has preserved the privileges and confidences applicable to communications made in the course of that relationship.

3. Fleming P.C. also was retained by a number of residents of the Broadlands subdivision who were concerned about the large hospital complex at Broadlands that the Complainants proposed to build near their homes. Fleming P.C. provided legal advice to these persons in the scope and course of its attorney-client relationship with them, and it has preserved all privileges and confidences applicable to communications made in the course of that attorney-client relationship.

B. The Blizzard of Subpoenae Served Over the Holidays.

4. The Complainants in this cause have served a Subpoena *duces tecum* upon Fleming P.C. (the “Subpoena”). A copy of the Subpoena is attached as Exhibit “A” to this Motion.² Similar subpoenas were also served on nine other non-parties (collectively, the “Subpoenaed Parties”). Each of the Subpoenaed Parties is either an affiliate of Loudoun

² To avoid unnecessary duplication, the attached copy of the Subpoena omits the copy of the Bill of Complaint filed in this cause that was attached to the original.