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**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

In re:

MERIT STREET MEDIA, INC.,<sup>1</sup>

Debtor.

Chapter 11

Case No. 25-80156 (SWE)

**NOTICE OF INTENT TO SERVE NON-PARTY SUBPOENA TO PRODUCE  
DOCUMENTS, INFORMATION, OR OBJECTS IN A CIVIL ACTION**

Pursuant to Federal Rule of Civil Procedure 45, Professional Bull Riders, LLC (“PBR”),  
will serve the subpoena, attached as **Exhibit 1**, on the following non-party:

Envoy Media Co., Inc.  
c/o Cogency Global, Inc., Registered Agent  
1601 Elm Street, Suite 4360  
Dallas, Texas 75201

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<sup>1</sup> The last four digits of the Debtor’s federal tax identification number are 8990. The Debtor’s mailing address is 5501 Alliance Gateway Fwy, Fort Worth, TX 76177.

Dated: August 1, 2025

Respectfully submitted,

/s/ Jason M. Rudd

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**COUNSEL TO PROFESSIONAL BULL RIDERS, LLC**

**CERTIFICATE OF SERVICE**

I certify that on August 1, 2025, a true and correct copy of the foregoing document was served by the Court's ECF noticing system on all parties that consent to such service via electronic filing.

*/s/ Jason M. Rudd*

\_\_\_\_\_  
Jason M. Rudd

**EXHIBIT 1**

PROPOSED SUBPOENA TO BE SERVED

# UNITED STATES BANKRUPTCY COURT

Northern District of Texas

In re Merit Street Media, Inc.

Debtor

Case No. 25-80156

(Complete if issued in an adversary proceeding)

Chapter 11

Plaintiff

v.

Adv. Proc. No. \_\_\_\_\_

Defendant

## SUBPOENA TO TESTIFY AT A DEPOSITION IN A BANKRUPTCY CASE (OR ADVERSARY PROCEEDING)

TO: Envoy Media Co., Inc., c/o Cogency Global, Inc., Registered Agent, 1601 Elm Street, Suite 4360, Dallas, Texas 75201

(Name of person to whom the subpoena is directed)

**Testimony:** **YOU ARE COMMANDED** to appear at the time, date, and place set forth below to testify at a deposition to be taken in this bankruptcy case (or adversary proceeding). If you are an organization, you must designate one or more officers, directors, or managing agents, or designate other persons who consent to testify on your behalf about the following matters, or those set forth in an attachment:

PLACE Wick Phillips Gould & Martin, LLP 100 Throckmorton St., Suite 1500, Fort Worth, TX 76102	DATE AND TIME August 13, 2025 9:00 a.m. (prevailing central time)
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The deposition will be recorded by this method:

Stenographic and/or videographic means

**Production:** You, or your representatives, must also bring with you to the deposition the following documents, electronically stored information, or objects, and must permit inspection, copying, testing, or sampling of the material: Please see Attachment A with production requests and instructions

The following provisions of Fed. R. Civ. P. 45, made applicable in bankruptcy cases by Fed. R. Bankr. P. 9016, are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and 45(g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 8/1/2025

CLERK OF COURT

OR

\_\_\_\_\_  
Signature of Clerk or Deputy Clerk

/s/ Jason M. Rudd  
Attorney's signature

The name, address, email address, and telephone number of the attorney representing (name of party) Professional Bull Riders, LLC, who issues or requests this subpoena, are:

Jason Rudd of Wick Phillips, 3131 McKinney Ave., Ste. 500, Dallas, TX 75204; jason.rudd@wickphillips.com

### Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things, or the inspection of premises before trial, a notice and a copy of this subpoena must be served on each party before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**PROOF OF SERVICE**

**(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)**

I received this subpoena for *(name of individual and title, if any)*: \_\_\_\_\_  
on *(date)* \_\_\_\_\_ .

I served the subpoena by delivering a copy to the named person as follows: \_\_\_\_\_  
\_\_\_\_\_ on *(date)* \_\_\_\_\_ ; or

I returned the subpoena unexecuted because: \_\_\_\_\_  
\_\_\_\_\_

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of \$ \_\_\_\_\_ .

My fees are \$ \_\_\_\_\_ for travel and \$ \_\_\_\_\_ for services, for a total of \$ \_\_\_\_\_ .

I declare under penalty of perjury that this information is true and correct.

Date: \_\_\_\_\_

\_\_\_\_\_  
*Server's signature*

\_\_\_\_\_  
*Printed name and title*

\_\_\_\_\_  
*Server's address*

Additional information concerning attempted service, etc.:

**Federal Rule of Civil Procedure 45(c), (d), (e), and (g) (Effective 12/1/13)**  
**(made applicable in bankruptcy cases by Rule 9016, Federal Rules of Bankruptcy Procedure)**

**(c) Place of compliance.**

(1) *For a Trial, Hearing, or Deposition.* A subpoena may command a person to attend a trial, hearing, or deposition only as follows:

- (A) within 100 miles of where the person resides, is employed, or regularly transacts business in person; or
- (B) within the state where the person resides, is employed, or regularly transacts business in person, if the person
  - (i) is a party or a party's officer; or
  - (ii) is commanded to attend a trial and would not incur substantial expense.

(2) *For Other Discovery.* A subpoena may command:

- (A) production of documents, or electronically stored information, or things at a place within 100 miles of where the person resides, is employed, or regularly transacts business in person; and
- (B) inspection of premises, at the premises to be inspected.

**(d) Protecting a Person Subject to a Subpoena; Enforcement.**

(1) *Avoiding Undue Burden or Expense; Sanctions.* A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The court for the district where compliance is required must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney's fees — on a party or attorney who fails to comply.

(2) *Command to Produce Materials or Permit Inspection.*

(A) *Appearance Not Required.* A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) *Objections.* A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

- (i) At any time, on notice to the commanded person, the serving party may move the court for the district where compliance is required for an order compelling production or inspection.
- (ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party's officer from significant expense resulting from compliance.

(3) *Quashing or Modifying a Subpoena.*

(A) *When Required.* On timely motion, the court for the district where compliance is required must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person to comply beyond the geographical limits specified in Rule 45(c);
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) *When Permitted.* To protect a person subject to or affected by a subpoena, the court for the district where compliance is required may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information; or

(ii) disclosing an unretained expert's opinion or information that does not describe specific occurrences in dispute and results from the expert's study that was not requested by a party.

(C) *Specifying Conditions as an Alternative.* In the circumstances described in Rule 45(d)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

**(e) Duties in Responding to a Subpoena.**

(1) *Producing Documents or Electronically Stored Information.* These procedures apply to producing documents or electronically stored information:

(A) *Documents.* A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) *Form for Producing Electronically Stored Information Not Specified.* If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) *Electronically Stored Information Produced in Only One Form.* The person responding need not produce the same electronically stored information in more than one form.

(D) *Inaccessible Electronically Stored Information.* The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) *Claiming Privilege or Protection.*

(A) *Information Withheld.* A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) *Information Produced.* If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information under seal to the court for the district where compliance is required for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

...  
(g) **Contempt.** The court for the district where compliance is required — and also, after a motion is transferred, the issuing court — may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena or an order related to it.

## ATTACHMENT A

### I. INSTRUCTIONS

The following instructions apply to the requests for production that follow:

1. You must respond in writing to each separate request for documents set forth below.
2. All documents produced in response to these requests are to be produced in the form, order, and manner in which they are maintained in Your files or shall be organized and labeled to correspond with these requests.
3. For any documents requested that were at one time in Your possession, custody or control, but no longer are in Your possession, custody or control, identify the document, state the date upon and the circumstances under which it left Your possession, custody or control, identify all persons having knowledge of the circumstances under which it left Your possession, custody or control, identify its last known custodian, and identify all persons having knowledge of the contents.
4. For any documents requested that were at one time in Your possession, custody or control, but that You believes have ceased to exist or have been lost or destroyed, identify the document, state the date upon and the circumstances under which it ceased to exist or was lost or destroyed, identify all persons having knowledge of the circumstances under which it ceased to exist or was lost or destroyed, identify its last known custodian, and identify all persons having knowledge of the contents.
5. If any documents identified in response to these requests are in the possession of a third party, identify the third party and the location where the documents are maintained by the third party.
6. Any document that bears any marks, including by way of illustration only and without limitation, initials, stamped indicia, comments or notations of any character, which are not a part of the original text or any reproduction, is to be considered a separate document.
7. If You withholds any document requested herein as privileged, confidential, or otherwise protected from disclosure, You must provide a privilege log containing the following information:
  - a. the date of the document;
  - b. the author(s) of the document;
  - c. the addressee(s) and recipient(s) of the document;
  - d. the document type;
  - e. a brief description of the nature and subject matter of the document; and,
  - f. the reason(s) for withholding the document.

8. If You withhold any document requested herein on the grounds that production is prohibited by a protective order or confidentiality agreement, identify such order or agreement, and produce a copy of such order or agreement.
9. If You object to a portion of a request or otherwise cannot comply in full, You should produce all other documents called for by that request, describe the respects in which You object to the request or otherwise cannot comply with it in full, and explain the basis for Your objection or failure to comply with the request in full.
10. All requests shall be interpreted to bring within their scope the broadest range of discovery permissible under the applicable Bankruptcy Rules, Federal Rules, and Local Rules. These requests for production are continuing in nature, so PBR requests that supplemental responses and production be submitted seasonably if further or different information is obtained with respect to any request.
11. All uses of the conjunctive include the disjunctive and vice versa to make the request more inclusive rather than exclusive, such that “and” and “or” shall be interpreted to mean “and/or” and shall not be interpreted to exclude any document from the scope of the request.
12. All singular nouns include the plural and vice versa to make the request more inclusive rather than exclusive.
13. All uses of the word “all” include “any” and vice versa, to make the request more inclusive.
14. All uses of the word “each” include “every” and vice versa, to make the request more inclusive.
15. The use of a verb in any tense encompasses the use of the verb in all tenses.
16. A document or communication “concerning,” “that relates to,” “relating to,” “related to,” “relating thereto,” “referring to,” or “reflecting” a given subject means all documents and things or communications that directly or indirectly constitute, contain, embody, concern, evidence, show, comprise, reflect, identify, state, refer to, deal with, comment on, respond to, describe, involve, mention, discuss, record, support, negate, or are in my way pertinent to that subject.
17. Your document production must identify which files and documents are being produced. Files and documents in the custody of an individual must be identified by the name of the individual having custody. The term “identify”:
  - a. when used in reference to a natural person, means to state the person’s full name, present or last known home address and telephone number, present or last known business address and telephone number, occupation, job title, job description, any present or former relationship to any of the parties to this action and the years of such relationship;

- b. when used in reference to a person other than a natural person, means to state the person's full name, present or last address or principal place of business and form of organization (e.g., partnership, corporation);
  - c. when used in reference to a document, means to state the title, date, author, author's affiliation, addressee, addressee's affiliation, general subject matter, type of document (i.e., letter, memorandum), present location and the identity of each person having possession, custody or control of the document or any copy of the document; and
  - d. when used in reference to a communication, means to state whether it was written or oral, the general subject matter of the communication, the place and date of the communication, the identity of the persons present during the communication, the persons engaged in, participating in, or involved in any way in the communication and any documents referring or relating to the communication.
18. A request means a request for all paper and electronically stored information ("ESI") responsive to the request. As to paper documents, such a request is a request for legible copies and an opportunity, if necessary, to inspect the originals of those documents as they are kept in the usual course of business. All ESI should be produced as full text searchable .PDF images of the native documents, or other comparable searchable format, and shall include all metadata associated with ESI.
19. Along with each document responsive to the requests below, produce any document that is or was appended to or enclosed with it, and if any other such document no longer exists, identify the document that was appended or enclosed.
20. A request for files containing documents includes all documents that are contained in those files or that have been removed from those files for any reason other than that they are being withheld from production on the ground of privilege or work product.
21. No document may be withheld from Your production solely on the ground that it is confidential since a protective order is in place or will be in place. Notwithstanding this instruction, if You withholds a document from production based solely on confidentiality, You must include it in Your privilege log.
22. A request for all documents of any particular type means: 1) all such documents regardless of whether they are kept in one or more locations, 2) all such documents whether they are in paper or electronic form, and 3) all such documents including all versions of such documents.
23. If, in responding to these discovery requests, You encounter any purported ambiguities, please so state, set forth the matter deemed ambiguous, and the construction used in responding.
24. To the extent that any discovery requests contained herein relate to the alter ego claims asserted by PBR, those requests are included in an abundance of caution in the event that

it may be determined that those claims belong to the Debtor. However, PBR does not concede that such claims do belong to the Debtor and reserves all of its rights with respect to the alter ego claims against Dr. Phil and any other claims it may have, whether such claims have been asserted already or may be asserted in the future, to argue that those claims are particular to PBR and do not belong to the Debtor.

## II. DEFINITIONS

The following definitions apply to the requests for production that follow:

1. The term “Adversary Complaint” means the Adversary Complaint for Declaratory and Monetary Relief filed on July 2, 2025 [D.I. 3].
2. The term “Case” shall mean the above-referenced chapter 11 bankruptcy proceeding pending in the United States Bankruptcy Court for the Northern District of Texas as case no. 25-80156 (SWE).
3. The term “communication” means any communication, however made, including, but not limited to, correspondence, contact, discussion, or any other kind of oral or written exchange between two or more persons, including, but not limited to, all telephone conversations, face-to-face conversations, meetings, visits, conferences, e-mail or other electronic messages, texts, facsimiles, telexes, internal and external discussions, lectures, presentations, letters, notes, directives, memoranda, circulars, bulletins, telegrams, voicemail messages, and documents, however the same are transcribed, sent, or given.
4. The term “Debtor” means MSM.
5. The term “DIP Facility” means the \$21.4 million of secured debtor-in-possession financing proposed by way of the Debtor’s Emergency Motion for Entry of Interim and Final Orders (I) Authorizing (A) Postpetition Financing, and (B) The Use of Cash Collateral; (II) Granting Liens and Providing Superpriority Administrative Expense Claims; (III) Modifying the Automatic Stay; (IV) Scheduling A Final Hearing; and (V) Granting Related Relief [D.I. 11].
6. The terms “document” or “documents” are used in the broadest possible sense and include, without limitation, all originals, copies, drafts, and recordings of any written, typewritten, handwritten, printed, graphic, electronic, digital, or otherwise recorded matter, including forms of information translatable or convertible into a reasonably usable form. “Document” or “documents” include, without limitation, the following items: electronic mail (e-mails), including, but not limited to, emails on Your personal devices and from Your personal email addresses; text messages on Your personal devices; Microsoft PowerPoint slides and/or presentations; Microsoft Excel spreadsheets; Microsoft Word documents or other word processing program; licenses; agreements; communications, including intracompany communications; correspondence; letters; memoranda; records; books; summaries or handwritten notes or other records of personal conversations or interviews; diaries; notebooks; appointment books or electronic entries; manuscripts, either

in final or draft form, whether complete or incomplete and whether published or not; grant or project proposals; forecasts; statistical statements; any and all forms of data; meeting abstracts; meeting agendas; meeting minutes; slides; graphs; charts; diagrams; maps; blueprints; tables; indices; pictures; audio or visual recordings; tapes; magnetic discs; printed cards; programming instructions; assembly diagrams; schematic diagrams; manuals; films; assay results and reports; charges; accounts; invoices; analytical records; reports, records or summaries of meetings or conferences; reports, records or summaries of consultants; reports, records or summaries of negotiations; brochures; pamphlets; circulars; trade letters; press releases; contracts; stenographic, handwritten or any other notes; projectable images, including transparent overheads or slides; any other document or writing or form of information convertible into a document, including information contained within or accessible by a computer or computer accessory and the underlying documents supporting computer entries.

7. The term “Envoy” means Envoy Media Co., Inc. and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
8. The term “Jackson Walker” means Jackson Walker LLP and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
9. The term “MSM” means debtor Merit Street Media, Inc. and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
10. The term “PBR” means creditor Professional Bull Riders, LLC and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
11. The term “person” means any natural person, firm, sole proprietorship, association, partnership, corporation, limited liability company, governmental agency, political subdivision, governmental body, quasi-public entity, joint venture, trust, estate, or any other form of legal entity, as well as any division, subdivision, department, bureau, office, or unit.
12. The term “Peteski” means Peteski Productions, Inc. and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.

13. The term “Dr. Phil” means Phillip C. McGraw, PhD, an individual citizen of Texas residing in Dallas.
14. The term “Relevant Time Period,” for purposes of these requests for production only and unless otherwise provided, means July 2, 2023 to the present.
15. The term “Sidley” means Sidley Austin LLP and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
16. The term “TBN” means Trinity Broadcasting of Texas, Inc. and all of its parents, subsidiaries, divisions, affiliates, predecessors, successors, and any present or former officers, directors, trustees, employees, agents, representatives, attorneys, or all other persons acting, or purporting to act, on its behalf.
17. The term “You” and “Your” means Envoy.

### **III. DOCUMENTS REQUESTED**

1. All documents and communications between You on one hand and MSM, Peteski, Dr. Phil, TBN, Sidley, or Jackson Walker on the other hand, including, but not limited to, documents or communications regarding this case, the DIP Facility, Dr. Phil, Peteski, or the Adversary Proceeding.
2. All documents and communications regarding Envoy’s organizational documents, including, but not limited to, its articles of incorporation and any operating agreement or other governing documents.
3. All documents and communications regarding Envoy’s principal place of business and its operations, including, but not limited to, the location of Envoy’s studio or other broadcasting location, the number of employees who report to work at that location, the programs or other media produced at that location, and any other documents or communications discussing the scope and subject matter of Envoy’s operations.
4. All documents and communications regarding any relationship—past or present—between MSM, Dr. Phil, or Peteski and any past or present owner or director of Envoy.
5. All documents and communications reflecting the identity of the directors of Envoy, including documents and communications reflecting any changes in the directors.
6. All documents and communications regarding any conflict waivers or potential conflicts between and among Envoy, MSM, Dr. Phil, or Peteski.
7. Organizational charts or other documents sufficient to show Envoy’s overall corporate organization and internal organization, including, but not limited to, how the structure of the corporate organization and internal organization has changed, if at all.

8. All documents and communications in Your possession, custody, or control regarding any capital contributions to Envoy or planned capital contributions to Envoy, including, but not limited to, capital contributions—planned or actual—by MSM, Peteski, TBN, Dr. Phil, or any other entity.
9. All documents and communications referring, reflecting, or relating to Envoy’s financial condition, including, but not limited to, any analyses, financial projections, or budgets.
10. All documents and communications regarding any and all payments or transfers of assets MSM made to Envoy, Peteski, Dr. Phil, any member of the McGraw family, any entity affiliated in any way with the McGraw family, TBN, or any entity affiliated in any way with TBN.
11. All documents or communications relating to all agreements, contracts, or other transactions or arrangements between or among Envoy, MSM, Peteski, TBN, Dr. Phil, or any other owners, shareholders, members, employees, or affiliates of MSM, including, but not limited to, any restrictive covenants between Envoy, on the one hand, and any individual, on the other hand, including, but not limited to, any non-compete, non-solicitation, or non-disclosure agreements between Dr. Phil and Envoy, or between any other individual and Envoy.
12. All documents and communications relating to any asset Envoy owns or partially owns, the date upon which Envoy became the owner or partial owner of the asset, the price Envoy paid for the asset, if any, the seller of the asset, and any other information relating to Envoy’s assets and the origin of those assets.
13. All documents and communications relating to Dr. Phil or Peteski exercising control over Envoy regarding any of the following corporate decisions: whether to make capital expenditures or contributions, whether to pay money owed under any contract, whether to transfer any assets to any other individual or entity or accept the transfer of assets from any other individual or entity, including, but not limited to, MSM.
14. All documents and communications relating to *Dr. Phil Primetime* or any other television program or media including Dr. Phil.
15. All documents and communications relating to Envoy’s employees and independent contractors, including, but not limited to, the start date for those employees and independent contractors, the last place of employment for those employees or independent contractors before commencing work at Envoy, and the relationship those employees or independent contractors have with Dr. Phil, Peteski, or MSM, if any.
16. All notices of meetings of the Envoy board of directors or any committee or subcommittee of the Envoy board of directors.
17. All documents distributed in advance of meetings of the Envoy board of directors or any committee or subcommittee of the MSM board of directors.

18. All documents and communications regarding proposals, resolutions, or other actions taken by the Envoy board of directors or any committee or subcommittee thereof, including, but not limited to, any actions taken by written consent.