

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,

V.

VERONIKA RODRIGUEZ,
DEFENDANT

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:
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No. CP-38-CR-430-2023

ENTERED & FILED
CLERK OF COURTS
LEBANON, PA
2025 MAY -5 A 9:51

MOTION TO QUASH SUBPOENA

AND NOW, comes Kristina Kolb and Diana Kolb, by and through their attorneys,
Buzgon Davis Law Offices, and files the foregoing Motion to Quash Subpoena, respectfully
averring as follows:

1. On April 4, 2025, a subpoena was issued to Kristina Kolb and Diana Kolb, which
stated the following:

You are hereby subpoenaed for the week of May 19, 2025. You are ordered by the
Court to come to the Lebanon County District Attorney's Office, Room 11, Ground
Floor, 400 South 8th Street, Municipal Building, Lebanon, PA on Monday, the 19th
date of May, 2025 at 8:30 a.m. to testify on behalf of the Commonwealth in the
above case and remain until excused.

2. Despite obtaining and possessing the aforementioned subpoenas since April 4,
2025, the aforementioned subpoenas were only served on April 29, 2025 (upon Kristina Kolb)
and April 30, 2025 (upon Diana Kolb).

3. Kristina Kolb and Diana Kolb are requesting the subpoenas issued against them
be quashed for the following reasons:

- a. Upon information and belief, the Commonwealth's subpoena is intended to annoy, embarrass, oppress, and burden Kristina Kolb. Specifically, Ms. Kolb is the sister of Defendant. Ms. Kolb has never been contacted, interviewed, or otherwise questioned by any police officer, detective, district attorney, or any other agency of the Commonwealth regarding any relevant information she may possess in the above referenced matter despite the following: (1) Ms. Kolb being present at nearly all of Defendant's court appearances; (2) Ms. Kolb being present at nearly all criminal central court dates as an employee of the County, and (3) the above referenced case existing and being litigated for over (2) years.
- b. Upon information and belief, the Commonwealth's subpoena is intended to annoy, embarrass, oppress, and burden Diana Kolb. Specifically, Diana Kolb is the mother of Defendant. Ms. Kolb has never been contacted, interviewed, or otherwise questioned by any police officer, detective, district attorney, or any other agency of the Commonwealth regarding relevant information she may possess in the above referenced matter despite the following: (1) Ms. Kolb being present at nearly all of Defendant's court appearances; and (2) the above referenced case existing and being litigated for over (2) years.
- c. Upon information and belief, and in conjunction with points (a) and (b) referenced above, the Commonwealth is engaging in fishing expedition two (2) weeks prior to trial by issuing subpoenas to Diana Kolb and Kristina Kolb that serve no purpose, except to (1) isolate these individuals to the District Attorney's office during trial, (2) prevent these individuals from being present during the trial whether through sequestration and/or subpoena, and/or (3) from being a support system for the Defendant during this trial.
- d. Pennsylvania Rule of Criminal Procedure 107 permits a witness to *appear before the court* at the date, time, and place specified. It is impermissible for Kristina Kolb and Diana Kolb to be subpoenaed to the Lebanon County District Attorney's Office. See PA.R.CRIM.P. 107 (emphasis added).
- e. Pennsylvania Rule of Criminal Procedure 107 requires a subpoena to state the identity, address, a phone number of the attorney who applied for the subpoena. The subpoena served fails to comply with Pennsylvania Rule of Criminal Procedure 107 in this respect. See ID.

WHEREFORE, Kristina Kolb and Diana Kolb, respectfully requests this Honorable Court to grant their Motion to Quash Subpoena.

BUZGON DAVIS LAW OFFICES

Respectfully submitted,

BY: 

Joseph A. Crowe; Attorney I.D. # 315780
525 South Eighth Street
Lebanon, PA 17042
717-274-1421
crowe@buzgondavis.com
Attorneys for Kristina Kolb and Diana Kolb

PUBLIC ACCESS POLICY CERTIFICATION

I certify that this filing complies with the provisions of the *Public Access Policy of the Unified Judicial System of Pennsylvania: Case Records of the Appellate and Trial Courts* that require filing confidential information and documents differently than non-confidential information and documents.

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA, :
 :
 : No. CP-54-CR-430-2023
 :
 V. :
 :
 :
 VERONIKA RODRIGUEZ, :
 :
 DEFENDANT :

CERTIFICATE OF SERVICE

I, Joseph A. Crowe, Esquire of Buzgon Davis Law Offices, 525 South Eighth Street, Lebanon, Lebanon County, Pennsylvania, 17042, hereby certify that the following service has been completed in compliance with the Rules of Criminal Procedure:

Via Hand Delivery

District Attorney's Office
Municipal Building, Room #11
400 S. 8th Street
Lebanon, PA 17042-6794

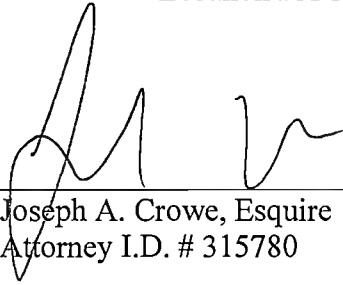
Clerk of Courts
Municipal Building
400 S. 8th Street
Lebanon, PA 17042-6794

Interoffice Mail System

Court Administration
Lebanon County Courthouse
400 S. 8th Street
Lebanon, PA 17042

Ian Ehrgood, Esquire
410 Chestnut Street
Lebanon PA 17042

By:



Joseph A. Crowe, Esquire
Attorney I.D. # 315780

Date: May 5th, 2025

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA, :
 : No. CP-38-CR-430-2023
 V. :
 :
 VERONIKA RODRIGUEZ, :
 DEFENDANT :

ORDER

AND NOW, this _____ day of May, 2025, upon consideration of Diana and Kristina Kolb's Motion to Quash Subpoena, it is hereby ordered that their Motion is GRANTED. The Commonwealth's April 4, 2025 subpoena issued to Diana Kolb and Kristina Kolb is hereby Quashed.

J.

IN THE COURT OF COMMON PLEAS OF LEBANON COUNTY, PENNSYLVANIA
CRIMINAL DIVISION

COMMONWEALTH OF PENNSYLVANIA,	:
	: No. CP-38-CR-430-2023
V.	:
	:
VERONIKA RODRIGUEZ,	:
DEFENDANT	:

ORDER

AND NOW, this _____ day of May, 2025, upon consideration of Diana and Kristina Kolb's Motion to Quash Subpoena, it is hereby ordered that a hearing shall be held on May _____, 2025 at ____:____ a.m./p.m. in Courtroom No. 2.

J.