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[Redacted] 2)
[Redacted]
[Redacted]

Attorneys for Plaintiff, [Redacted]

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES - CENTRAL**

[Redacted]

Plaintiff,

vs.

[Redacted]

Defendants.

CASE NO. [Redacted]

signed to: [Redacted]

Complaint filed on September 27, [Redacted]

**NOTICE OF TAKING DEPOSITION OF
CUSTODIAN OF RECORDS WITH
PRODUCTION OF DOCUMENTS**

Date: [Redacted]

Time: [Redacted]

Location: [Redacted]

TO DEFENDANTS [Redacted],

[Redacted] AND TO THEIR ATTORNEYS OF RECORD

HEREIN:

NOTICE IS HEREBY GIVEN that Plaintiff will take the deposition of the
CUSTODIAN OF RECORDS of Defendants [Redacted]

[Redacted]

[Redacted]

1 **PLEASE TAKE FURTHER NOTICE** that pursuant to California Code of Civil
2 Procedure § 2031, Plaintiff requests the witness produce for inspection and copying at said
3 deposition the originals of the following documents:

4 (1) Each and every complete original claim files kept in connection with the
5 subject claim, No. [REDACTED] as maintained at home office, any regional office, any local
6 office or any other claims office maintaining such files, including all file contents, file
7 jackets, computer files and every e-mail.

8 (2) Each and every complete original underwriting file kept in connection with the
9 subject policy, Nos. [REDACTED] and [REDACTED] as maintained at home office, any
10 regional office, any local office or any other office maintaining such files, including all file
11 contents, file jackets, computer files and every e-mail.

12 The deposition will be taken on [REDACTED] at 1:00 p.m. at the law offices of

13 [REDACTED]

14 [REDACTED] 1.

15 Said deposition will take place before a Notary Public or Certified Court Reporter,
16 pursuant to the laws of the State of California, and will continue from day to day, excluding
17 holidays and weekends, until completed, and may be videotaped.

18 If a translator is needed, please notify Plaintiff's counsel no later than five days
19 before the date of the deposition.

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21 Dated [REDACTED]

[REDACTED]

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By _____

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William A. Daniels
Attorneys for Plaintiff

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[REDACTED]