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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

STEVEN E. KROLL,

Plaintiff,

vs.

INCLINE VILLAGE GENERAL IMPROVEMENT
 DISTRICT, a/k/a IVGID, a governmental subdivi-
 sion of the State of Nevada; et al.,

Defendants.

Case No. 3:08-cv-00166-ECR-RAM

**Plaintiff's Notice of Taking Deposition
 of Defendant IVGID Regarding
 Policy 136 and Request for Production
 of Documents**

and

Certificate of Service

PLEASE TAKE NOTICE that pursuant to Rule 30(b)(6) of the Federal Rules of Civil Procedure, plaintiff STEVEN E. KROLL will take the deposition of defendant INCLINE VILLAGE GENERAL IMPROVEMENT DISTRICT (IVGID) on **Wednesday July 16, 2008 beginning at 9:00 a.m. at the office of BONANZA REPORTING located at 1111 Forest Street, Reno, NV 89509** (telephone 775-786-7655), or at such other time and place as the parties may agree. The deposition will be recorded stenographically and be taken before a Notary Public or other officer authorized to administer oaths, and will continue from day to day until completed, weekends and public holidays excepted.

In accordance with Rule 30(b)(6) of the Federal Rules of Civil Procedure, **IVGID is hereby notified of its obligation to designate one or more officers, directors, or managing agents (or other persons who consent to do so) to testify on its behalf** as to all matters known or reasonably available to IVGID pertaining to the genesis, history, implementation and interpreta-

tion by said defendant of Policy and Procedure Number 136 Concerning Access to District Property and the Use of District Facilities for Expression.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 34 of the Federal Rules of Civil Procedure, plaintiff requests that IVGID produce for inspection, copying and use at the deposition all of the documents and tangible things in its possession, custody, or control bearing upon or involving directly or indirectly the genesis, history, implementation and interpretation by said defendant of Policy and Procedure Number 136 Concerning Access to District Property and the Use of District Facilities for Expression. Production shall take place at the time and place of the deposition (9:00 a.m. on July 16, 2008 at the office of BONANZA REPORTING located at 1111 Forest Street, Reno, NV 89509), or at such other time and place as the parties may agree.

DATED: at Crystal Bay, Nevada this 24th day of June, 2008.



Steven E. Kroll, Esq.
Attorney for Plaintiff

CERTIFICATE OF SERVICE BY MAIL and EMAIL

Pursuant to Rule 5(b) FRCP, I certify that I am the attorney for Plaintiff in the above entitled action, and that on this date I caused a true and correct copy of the “ **Plaintiff’s Notice of Taking Deposition of Defendant IVGID Regarding Policy 136 and Request for Production of Documents**” herein to be served upon the parties or attorneys by depositing the same with the U.S. Post Office from a point within the State of Nevada, first class postage pre-paid, and addressed to:

Stephen C. Balkenbush, Esq.
Thorndal, Armstrong, Delk, Balkenbush & Eisinger
6590 South McCarran Blvd. Suite B
Reno, Nevada 89509

and also electronically by eMail to said parties or attorneys addressed to:

Stephen C. Balkenbush
rla@thorndal.com,
receptionist2@thorndal.com
sbalkenbush@thorndal.com
smb@thorndal.com

DATED: this 24th day of June, 2008.



STEVEN E. KROLL