

1 Kimberly D. Snow, Esq., SBN # 206950
2 Robert J. Iacopino, Esq., SBN #279754
3 **LA FOLLETTE, JOHNSON, DE HAAS,**
4 **FESLER & AMES**
5 2677 N. Main Street, Suite 901
6 Santa Ana, CA 92705
7 Telephone: (714) 558-7008
8 Facsimile: (714) 972-0379
9 Email: Ksnow@ljdfa.com

6 Attorneys for Defendant,
7 TODD H. KATZMAN, M.D.

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE COUNTY - CENTRAL JUSTICE CENTER**

11 ALAN EGER,) CASE NO.:30-2018-00976866-CU-MM-CJC
12 Plaintiff,) Hon. Thomas Delaney
13 v.) Department C24
14 TODD H. KATZMAN, M.D., and DOES 1) **NOTICE OF TAKING DEPOSITION OF**
15 THROUGH 25, INCLUSIVE) **PLAINTIFF AND DEMAND FOR**
16 Defendant.) **PRODUCTION OF DOCUMENTS AND**
17) **THINGS**
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)
Complaint Filed: 03/01/2018

19 TO PLAINTIFF AND TO HER ATTORNEYS OF RECORD HEREIN:

20 **PLEASE TAKE NOTICE** that the above-named Defendant, Todd H. Katzman, M.D., will
21 take the deposition of Plaintiff, Alan Eger, individually, as follows

<u>DEPONENT</u>	<u>DATE/TIME</u>	<u>LOCATION</u>
23 Alan Eger, as an Individual	24 June 13, 2018, 25 at 10:00 a.m.	26 La Follette, Johnson, De Haas, 27 Fesler & Ames 28 2677 N. Main Street, Suite 901 Santa Ana, CA 92705 (714) 558-7008

26 The deposition will be taken on oral examination before a certified shorthand reporter
27 authorized to administer oaths in the State of California.

28 ///

1 Pursuant to the provisions of Code of Civil Procedure, Sections 2025.010, et seq., the
2 deposition may be videotaped.

3 The deposition will commence on the above-stated date and will continue from day to day
4 until completed, excepting Saturdays, Sundays and holidays.

5 If an interpreter is required to translate testimony, notice must be given within five (5)
6 days before the deposition date and the specific language and dialect designated. ***Cancellation of***
7 ***said interpreter requires a 24- hour notice.***

8 Pursuant to Code of Civil Procedure section 2025.220, PLEASE TAKE NOTICE that The
9 Cooperative of American Physicians, the administrator of Todd H. Katzman, M.D.'s professional
10 liability carrier Mutual Protection Trust, has entered into an agreement with US Legal and has
11 directed La Follette, Johnson, De Haas, Fesler & Ames to utilize the court reporting services of US
12 Legal at this deposition. In addition, Code of Civil Procedure section 2025.320(d) requires upon the
13 request of any party or attorney at the deposition, the attorney who noticed the deposition must enter
14 into the record a list of all the services and products which the court reporting company is making
15 available to them. Counsel is advised that US Legal Support makes available the following services:
16 Court Reporting (certified original and one copy Non-Technical Witness);
17 Videotaped/Interpreted/Technical/Expert Witness; Deposition Expedite; Exhibit Hard Copies BW;
18 Exhibit Hard Copies BW; Exhibit Hard Copies Color; Rough Draft Condensed; Realtime Hook-up;
19 E CD Lit Disk (ASCII, condensed, pdf); Reporter Appearance; Late Cancel/Non-Appearance;
20 Affidavit of Non-Appearance; Waiting Time/Overtime; Shipping & Handling; Witness Letter; Per
21 Code Handling; Parking; Record Retrieval; Basic Charges; Subpoena Prep; Authorization Prep;
22 Pages; Paper; Electronic; Shipping& Handling; Bate Stamp; OCR/Search Feature; Addl Notice To
23 Counsel; X-ray; Hard Copy; Electronic; CD-Rom; Breakdown; Custodian Charges; Online Access;
24 Upload; Bookmarking.

25 ///

26 ///

27 ///


28 ///

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

NOTICE IS FURTHER GIVEN that the deponent is required to produce at the deposition at the time and place set forth above, the writings, records, documents and other things listed in Exhibit "A" attached hereto.

DATED: April 30, 2018

LA FOLLETTE, JOHNSON, DE HAAS,
FESLER & AMES

BY: 

KIMBERLY D. SNOW, ESQ.
ROBERT J. IACOPINO
Attorneys for Defendant,
TODD H. KATZMAN, M.D.