

NOTICE OF TAKING DEPOSITION
OF NON-PARTY AND FOR
PRODUCTION OF DOCUMENTS

Sample Only
Use At Your Own Risk



To: _____, and their attorneys of record:

YOU ARE NOTIFIED that on _____ [date], at _____ [time],
_____ [plaintiff or defendant] will take the oral deposition of _____ [name
of nonparty deponent], at _____ [the office of _____ (name of law firm) or
as the case may be], located at _____ [address], _____ [city], _____
County, California. The deposition will continue from day to day until completed.

_____ [If nonparty deponent is a natural person, add the following:
Deponent, who is not a party to this action, resides at _____ (address),
_____ (city), _____ County, California. Deponent's telephone number is
_____.]

_____ [If nonparty deponent is not a natural person, add the following:
Deponent, a nonparty, is _____ (a corporation organized and existing under the
laws of California or as the case may be). Deponent's _____ (principal office or
as the case may be) is located at _____ (address), _____ (city),
_____ County, California. Deponent's telephone number is _____.

_____ (Deposing party) intends to examine deponent about the following matters
at oral deposition: _____ (list matters on which examination is requested with
reasonable particularity). Pursuant to section 2025(d)(6) of the Code of Civil
Procedure, deponent is advised that it must designate and produce at the deposition

those of its officers, directors, managing agents, agents, or employees who are most qualified to testify on its behalf regarding the matters specified above.]

_____ [If deposing party seeks production of any materials at deposition, add the following: Deponent is required to produce at deposition, at the time and place set forth above, the materials described in the attached deposition subpoena.]

_____ [If deposing party intends to audio or video tape deposition in addition to stenographically recording it, add the following: Pursuant to section 2025(l)(1) of the Code of Civil Procedure, _____ (deposing party) intends to record deponent's deposition stenographically, and by _____ (audio or video) tape.]

_____ [If deposing party intends to use at trial a video tape of nonparty deponent who is an expert witness or treating or consulting physician, add the following: Pursuant to section 2025(u)(4) of the Code of Civil Procedure, _____ (deposing party) intends to reserve the right to use at trial the video tape deposition of deponent, who is _____ (an expert witness or a treating or consulting physician) in this case.]

[EITHER]

The parties or attorneys representing parties served with this notice are:

_____ [list parties or counsel served with notice].

[OR]

The Proof of Service attached to this notice contains a list of the parties or their attorneys served with this notice.

Date: _____
_____ [Plaintiff's name]
Plaintiff *In Pro Per*

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