

KINSEY
LAW
OFFICES



NOTICE OF TAKING DEPOSITION AND FOR PRODUCTION OF DOCUMENTS

Sample Only
Use At Your Own Risk



To _____, and to their attorneys of record:

YOU ARE NOTIFIED that on _____ [date], at _____ [time],
_____ [plaintiff or defendant or as the case may be] will take the oral deposition
of _____ [name of party or party-affiliated deponent], the _____ [plaintiff or
defendant or as the case may be] in this action, 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 party deponent is not a natural person, add the following:
Deponent is _____ (a corporation organized and existing under the laws of
California or as the case may be). _____ (Deposing party) intends to examine
deponent about the following matters at deposition: _____ (list matters on which
examination is requested with reasonable particularity).]

_____ [If deposing party seeks production of any materials at deposition, add
one of the following:]

[EITHER]

Deponent is required to produce at deposition the following materials at the time
and location set forth above: _____ [describe materials with reasonable

particularity]

[OR]

Deponent is required to produce at the deposition the materials described in Exhibit ___ attached to this notice and incorporated by reference.

_____ [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 _____ (plaintiff's or defendant's) deposition stenographically, and by _____ (audio or video) tape.]

_____ [If deposing party intends to use at trial a video tape of a party 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 _____ (plaintiff or defendant), 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 and attorneys on whom this notice has been

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

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