

SELARZ LAW CORP.
11777 San Vicente Blvd., Suite 702
Los Angeles, California 90049
Tel: 310.651.8685 • Fax: 310.651.8681

1 SELARZ LAW CORP.
DANIEL E. SELARZ (State Bar No. 287555)
2 dselarz@selarzlaw.com
11777 San Vicente Blvd., Suite 702
3 Los Angeles, California 90049
Telephone: 310.651.8685
4 Facsimile: 310.651.8681

5 **Attorneys for Plaintiff(s),**
[CLIENT'S NAME(S)]
6

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF [COUNTY], [DISTRICT]**

9 [PLAINTIFF(S)], an individual,
10 Plaintiff,
11 vs.
12 [DEFENDANT(S)], and DOES 1 to [#],
inclusive,
13 Defendants.

Case No. []
Honorable []
[Dept. [#]]

**NOTICE OF TAKING DEPOSITION OF
DEFENDANT [DEFENDANT'S NAME]
AND REQUEST FOR PRODUCTION OF
DOCUMENTS**

Date: [Date]
Time: [Time]
Place: Selarz Law Corp.
11777 San Vicente Blvd., Suite 702
Los Angeles, CA 90049

Action Filed: []
Trial Date: []

18
19 **TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

20 PLEASE TAKE NOTICE that, pursuant to California Code of Civil Procedure
21 §2025.210 – 2025.280, Plaintiff [CLIENT'S NAME] ("Plaintiff") will take the deposition
22 of Defendant [DEFENDANT'S NAME]'S ("Defendant") on [Date], at the offices of Selarz
23 Law Corp., located at 11777 San Vicente Blvd., Suite 702, Los Angeles, California 90049,
24 in the above-entitled matter. If the deposition is not completed on the date set out above,
25 the taking of the deposition will continue from day to day, excluding weekends and legal
26 holidays, thereafter until completed.

27 ///

28 ///

1 This deposition will be taken upon oral examination before any notary public or other
2 officer duly commissioned by the State of California to administer oaths by stenographic
3 method. Plaintiff reserves the right to record the deposition testimony by videotape for use
4 at trial, pursuant to California Code of Civil Procedure section 2025.220(a)(6). If the
5 services of an interpreter are needed, please notify this office immediately.

6 NOTICE IS FURTHER GIVEN that, pursuant to California Code of Civil Procedure
7 Sections 2025.220(4) and 2025.280(a), DEFENDANT is required to produce the
8 documents, records and other materials described below, which are in his possession, or
9 under the custody or control of any of his agents, representatives, and/or attorneys on or
10 before the date and time set forth for his deposition. The documents to be produced by
11 DEFENDANT are as follows:

12 **DEFINITIONS**

13 A. "PERSON(S)" includes any natural person, firm, association, organization,
14 partnership, business, trust, corporation, governmental or public entity or any other form of
15 legal entity.

16 B. "DOCUMENT" or "DOCUMENTS" shall mean all documents,
17 electronically stored information, and tangible things, including without limitation all
18 writings (as defined in Section 250 of the California Evidence Code) and all other means of
19 recording information, whether written, transcribed, taped, filmed, microfilmed, or in any
20 other way produced, reproduced, or recorded, and including but not limited to: originals,
21 drafts, computer-sorted and computer-retrievable information, copies and duplicates that
22 are marked with any notation or annotation or otherwise differ in any way from the original,
23 correspondence, memoranda, reports, notes, minutes, contracts, agreements, books, records,
24 checks, vouchers, invoices, purchase orders, ledgers, diaries, logs, calendars, computer
25 printouts, computer disks, card files, lists of persons attending meetings or conferences,
26 sketches, diagrams, calculations, evaluations, analyses, directions, work papers, press
27 clippings, sworn or unsworn statements, requisitions, manuals or guidelines, audit work
28 papers, financial analyses, tables of organizations, charts, graphs, indices, advertisements

1 and promotional materials, audited and unaudited financial statements, trade letters, trade
2 publications, newspapers and newsletters, photographs, emails, electronic or mechanical
3 records, facsimiles, telegrams and telecopies, and audiotapes. Each draft, annotated, or
4 otherwise non-identical copy is a separate DOCUMENT within the meaning of this term.
5 DOCUMENTS shall also include any removable sticky notes, flags, or other attachments
6 affixed to any of the foregoing, as well as the files, folder tabs, and labels appended to or
7 containing any documents. DOCUMENTS expressly include all ELECTRONIC
8 RECORDS.

9 D. “COMMUNICATION(S)” means any oral, written or electronic transmission
10 of information, including but not limited to meetings, discussions, conversations, telephone
11 calls, telegrams, memoranda, letters, telecopies, telexes, conferences, messages, notes or
12 seminars.

13 E. “RELATING TO,” “RELATED TO” or “RELATE(S) TO” means
14 constituting, containing, concerning, embodying, reflecting, identifying, stating,
15 mentioning, discussing, describing, evidencing, or in any other way being relevant to that
16 given subject matter.

17 F. “PLAINTIFF” shall mean PLAINTIFF [CLIENT’S NAME].

18 G. “DEFENDANT,” “YOU” and “YOUR” shall mean Defendant
19 [DEFENDANT’S NAME].

20 H. “SUBJECT INCIDENT” means and refers to the [Type of Case] incident on
21 [Date of Incident], described in PLAINTIFF’S Complaint upon which this suit is founded.

22
23
24
25
26 ///
27 ///
28 ///

1 **REQUESTS FOR PRODUCTION**

2 **REQUEST FOR PRODUCTION NO. 1:**

3 Any and all diagrams, photographs, slides, videotapes, and/or motion pictures that
4 depict the vehicle YOU were driving at the time of the SUBJECT INCIDENT.

5 **REQUEST FOR PRODUCTION NO. 2:**

6 Any and all diagrams, photographs, slides, videotapes, and/or motion pictures that
7 depict the scene of the SUBJECT INCIDENT.

8 **REQUEST FOR PRODUCTION NO. 3:**

9 All reports regarding or RELATING TO the SUBJECT INCIDENT, including but
10 not limited to, police reports, emergency reports, medical reports, and criminal investigation
11 reports.

12 **REQUEST FOR PRODUCTION NO. 4:**

13 All DOCUMENTS concerning or RELATING TO any investigation undertaken or
14 caused to be undertaken by YOU relating to the SUBJECT INCIDENT, including but not
15 limited to reports, notes, photographs, and transcripts of or notes regarding interviews.

16 **REQUEST FOR PRODUCTION NO. 5:**

17 Any and all written or recorded statements of witnesses that describe or RELATE
18 TO the SUBJECT INCIDENT.

19 **REQUEST FOR PRODUCTION NO. 6:**

20 Any and all written or recorded statements of parties to this action that describe or
21 RELATE TO the SUBJECT INCIDENT.

22 **REQUEST FOR PRODUCTION NO. 7:**

23 Any and all reports, memoranda, letters, and/or notes RELATED TO or referring to
24 the SUBJECT INCIDENT.

25
26 ///
27 ///
28 ///

SELARZ LAW CORP.
11777 San Vicente Blvd., Suite 702
Los Angeles, California 90049
Tel: 310.651.8685 • Fax: 310.651.8681

1 **REQUEST FOR PRODUCTION NO. 8:**

2 A copy of YOUR cell phone records, including times and dates of text messages,
3 from [Date of Incident], between [Time of Incident].
4

5
6 DATED: May 24, 2020

SELARZ LAW CORP.

7
8 By: _____
9 Daniel E. Selarz, Esq.
10 **Attorneys for Plaintiff(s),**
11 [Client's Name(s)]
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

Case No. []

I, the undersigned, declare as follows:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years, and not a party to the within action. I am an employee of, or agent for, SELARZ LAW CORP., whose business address is 11777 San Vicente Blvd., Suite 702, Los Angeles, CA 90049.

On May 24, 2020 I served the foregoing document(s) **NOTICE OF TAKING DEPOSITION OF DEFENDANT [DEFENDANT'S NAME] AND REQUEST FOR PRODUCTION OF DOCUMENTS** to the following party(ies) in this action addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

- (BY MAIL) I caused a true copy of each document, placed in a sealed envelope with postage fully paid, to be placed in the United States mail at Los Angeles, California. I am "readily familiar" with this firm's business practice for collection and processing of mail, that in the ordinary course of business said document(s) would be deposited with the U.S. Postal Service on that same day. I understand that the service shall be presumed invalid if the postal cancellation date or postage meter date on the envelope is more than one day after the date of deposit for mailing contained in this affidavit.
- (BY PERSONAL SERVICE) I caused to be delivered each such document by hand to each addressee above.
- (BY CERTIFIED MAIL – CCP §§1020, et seq.) I caused said document(s) to be deposited with the United States Mail, postage prepaid, return receipt requested, signed by addressee that said documents were received.
- (BY OVERNIGHT DELIVERY) I caused a true copy of each document, placed in a sealed envelope with delivery fees provided for, to be deposited in a box regularly maintained by **United Parcel Service®(UPS)**. I am readily familiar with this firm's practice for collection and processing of documents for overnight delivery and know that in the ordinary course of business practice the document(s) described above will be deposited in a box or other facility regularly maintained by UPS or delivered to a courier or driver authorized by UPS to receive documents on the same date it is placed for collection.
- (BY FACSIMILE) By use of facsimile machine number (310) 651-8681, I served a copy of the within document(s) on the above interested parties at the facsimile numbers listed above. The transmission was reported as complete and without error. The transmission report was properly issued by the transmitting facsimile machine.
- (BY ELECTRONIC SERVICE) Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at their electronic notification addresses. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

Executed on May 24, 2020, in Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Daniel E. Selarz

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

SERVICE LIST

SENT VIA U.S. MAIL

[Attorney's Name]
[Law Firm Name]
[Street Address]
[City, State & Zip Code]

Tel: (xxx) xxx-xxxx / Fax: (xxx) xxx-xxxx
Email: [Email Address]

[Attorneys for Defendant [DEFENDANT'S NAME]]