

SAMPLE eDepoze NOTICE LANGUAGE

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that pursuant to Code of Civil Procedure §§ 2025.010 *et seq.* and 2034.410 *et seq.*, Defendant [REDACTED] will take the deposition of Plaintiff [REDACTED] expert witness, [REDACTED], by and through its attorneys of record, commencing at 10:00 a.m. on September 12, 2017.

The deposition will take place at the offices of [REDACTED]. The deposition will be upon oral examination before an officer authorized by law to administer oaths and take depositions in the State of California. Said deposition, if not completed on said date, will be continued from day to day until completed, Saturdays, Sundays, and holidays excepted.

PLEASE TAKE FURTHER NOTICE that, pursuant to California Code of Civil Procedure § 2025.340, [REDACTED] reserves the right to record the testimony of this deponent by sound and visual videotape, and/or by stenographic method through the use of "realtime" transcription pursuant to California Code of Civil Procedure § 2030.010, *et seq.*

PLEASE TAKE FURTHER NOTICE that [REDACTED] reserves the right to present exhibits electronically through the use of eDepoze software in real time which shall be made available to the witness and counsel in real time.

PLEASE TAKE FURTHER NOTICE that [REDACTED] requests that the deponent produce at the deposition the following documents and/or tangible things:

REQUESTS FOR PRODUCTION

DEFINITIONS

Unless otherwise indicated, the following definitions shall apply to each Request for Admission:

1. "YOU" or "YOUR" means and refers to [REDACTED] and her representatives and/or agents.
2. [REDACTED] means and refers to Plaintiff [REDACTED] and its representatives and/or agents.