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Attorneys for Defendant RICHARD BRAUN, M.D.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
(NORTH COUNTY DIVISION)

RICK HOLLIFIELD

Plaintiff(s),

v.

RICHARD M. BRAUN, M.D., KVAAS
CONSTRUCTION CO., OLSEN STEEL,
INC., ARGONAUT INSURANCE CO., et
al.

Defendant(s).

CASE NO. GIN003700

FOURTH AMENDED
NOTICE OF DEPOSITION OF
ATTORNEY RICHARD SAX WITH
REQUEST FOR PRODUCTION AT
TIME OF DEPOSITION

ICJ: Lisa Guy-Schall
Department 28
Case Filed: 03/03/00
Trial Date: None Set

TO RICK HOLLIFIELD, PLAINTIFF IN PRO PER

AMENDED NOTICE IS HEREBY GIVEN THAT Defendant, **RICHARD M. BRAUN, M.D.**, by and through counsel, will take the deposition of **RICHARD SAX**, on **Wednesday, May 23, 2001, at 9:00 a.m.** Said depositions will be taken, upon oral examination, to be recorded by videotape pursuant to C.C.P. Section 2025, in the office of Richard Sax, located at 2192 Palomar Airport Road, 2nd Floor, Carlsbad, CA 92008, before a Certified Shorthand Reporter duly commissioned by the State of California, who may be present at said time and place; said deposition to continue through the day noticed as necessary.

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1 Please take notice the certified shorthand reporter may transcribe the deposition
2 proceeding in Real Time accessible to counsel who have appropriate computer equipment.
3 The certified shorthand reporter may charge counsel for accessing real time court reporting.

4 **NOTICE IS FURTHER GIVEN** that pursuant to Code of Civil Procedure §2025,
5 each deponent is required to bring to his deposition, for inspection and copying at the time
6 and place set forth above, the following documents:

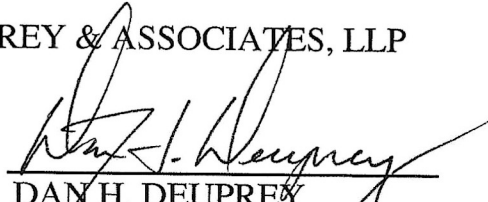
7 **REQUEST FOR PRODUCTION NO. ONE:**

8 All writings, records, files, documents or recordings of any kind relating to any
9 representation of plaintiff, Rick Hollifield, or litigation concerning Hollifield, including but
10 not limited to any workers' compensation proceedings or the suit against Olsen Steel,
11 including all attorney-client communications, generated or occurring during the period of
12 time commencing with the first contact at the outset of representation of Hollifield through
13 and including the point in time when the settlement of the Olsen Steel case became final or
14 the Olsen Steel case was dismissed with prejudice. .

15 Dated: 5-15-01

DEUPREY & ASSOCIATES, LLP

17 By:


18 DAN H. DEUPREY
19 SOLVEIG STORE DEUPREY
Attorneys for Defendant
20 RICHARD BRAUN, M.D.
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**SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO
NORTH COUNTY JUDICIAL DISTRICT**

CASE NAME : HOLLIFIELD -vs- RICHARD M. BRAUN, M.D., et al.

CASE NO : GIN003700

Judge: Hon. Lisa Guy-Schall

Dept: D.28

Date:

Time:

PROOF OF SERVICE BY MAIL

(CCP 1013a(1) & (3) & Local Rules, Division II, Rule 6.7)

I, !, declare that: I am over the age of 18 years and not a party to the case; I am employed in the County of San Diego, California, where the mailing occurs; and my business address is 402 West Broadway, Fourth Floor, San Diego, CA 92101.

I further declare that I am readily familiar with the business' practice for collection and processing of correspondence for mailing with the United States Postal Service; and that the correspondence shall be deposited with the United States Postal Service this same day in the ordinary course of business.

I caused to be served the following document(s): **Fourth Amended Notice of Deposition of Richard Sax with Request for Production at Time of Deposition**

by placing a true copy of each document in a separate envelope addressed to each addressee, respectively, as follows:

! (See Attached Mailing List.)

I then sealed each envelope and, with postage thereon fully pre-paid,

☐ I deposited each in the United States Postal Service at:

☒ I placed each for deposit in the United States Postal Service, this same day, at my business address shown above, following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on May 15, 2001

Secretary

CASE TITLE: HOLLIFIELD V. BRAUN, et al. CASE NO: GIN003700

LIST OF COUNSEL SERVED:

PLAINTIFF IN PRO PER:

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