V I R G I N I A:

IN THE CIRCUIT COURT OF

 \*

Plaintiff \*

 \*

vs. \* Case No.

 \*

 \*

 \*

Defendant \*

 ***AUDIO/VISUAL NOTICE OF DEPOSITION OF ENTITY***

COMES NOW the party designated below by Counsel and notices the deposition of the entity, . Such notice is pursuant to the applicable Rules of the Court and is to be taken as an audio/visual deposition. The entity identified herein is to designate one or more representatives pursuant to the Rules to testify as to the issues set forth below. Such deposition is to be taken at the office of the undersigned at the date and time indicated below:

Name of Deponent Date Time

One or more designee of the entity referenced

herein.

 The issues that the designee(s) should be prepared to testify to are the following:

1. The identity of all documents reviewed or looked at by the designee as part of the preparation for this deposition.
2. The identity of all persons spoken with by the designee as part of the preparation for this deposition.
3. The identity of those persons with the most knowledge of the incident referenced in the Complaint.
4. What documents other than attorney/client communications contain facts as to how the incident happened.
5. What documents other than attorney/client communications contain facts that the Plaintiff has not suffered the injuries and damages alleged in the pleadings or the discovery to date.
6. As to any affirmative defense asserted, all facts supporting that defense.
7. Any litigation the entity has been a party to involving the issues in this case specifically identifying that prior litigation by case name, jurisdiction where filed and names of the attorneys involved in that litigation. The particular issue that is the focus of this paragraph is \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_
8. All facts asserted in the Complaint initiating this action.

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

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 *Counsel for*

***CERTIFICATE OF SERVICE***

I hereby certify that a true copy of the foregoing was sent this \_\_\_\_\_\_\_\_\_ day of \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_, 20\_\_ by: \_\_\_\_\_\_\_\_ regular mail, postage pre-paid

\_\_\_\_\_\_\_\_ facsimile

\_\_\_\_\_\_\_\_ hand delivery

to:

 *Counsel for*

 \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Brien A. Roche, Esq.