

1 **JOSEPH D. COOPER SR. #139993**
2 **COOPER & COOPER**

3 **ATTORNEYS AT LAW**
4 7519 N. Ingram Avenue, Suite 103
5 Fresno, California 93711
6 Telephone (559) 442-1650
7 Facsimile (559) 442-1659

8 Attorneys for Defendants,
9 MARIO ALBERTO GUERRA (erroneously sued herein as MARIO ALBERTO GUERRO),
10 GUERRA PRODUCE and DANIEL CANCHOLA

11 **SUPERIOR COURT OF CALIFORNIA**

12 **COUNTY OF FRESNO**

13 CAL LeDUC; TORI ABBY; MILEY)
14 ABBY, a minor, by and through her)
15 Guardian ad Litem TORI ABBY; MANDY)
16 JOBE; LUKUS LeDUC; JAY LeDUC; and)
17 CAL LeDUC as successor in interest to the)
18 estate of Marsha Kay LeDuc)

19 Plaintiffs,

20 vs.

21 GENERAL MOTORS CORPORATION;)
22 TOYOTA MOTOR CORPORATION;)
23 NEW UNITED MOTOR)
24 MANUFACTURING, INC.; TRQSS, INC.)
25 (F/K/A QUALITY SAFETY SYSTEMS)
26 COMPANY); TRW AUTOMOTIVE)
27 GMBH (F/K/A TRW GmbH; F/K/A TRW)
28 Repa GmbH); TRW CANADA LIMITED;)
MARIO ALBERTO GUERRA; DANIEL)
M. CANCHOLA; GUERRA PRODUCE;)
and DOES 1 to 50, inclusive,)

Defendants.

CASE NO. 13CECG03811

**NOTICE OF TAKING DEPOSITION
OF MILEY ABBY WITH
PRODUCTION OF DOCUMENTS**

Complaint Filed: December 11, 2013

TO ALL PARTIES HEREIN AND TO THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that the following deposition will be taken in the above-entitled action before a certified shorthand reporter at the date and times hereinafter set forth at the offices of Cooper & Cooper, 7519 N. Ingram Avenue, Suite 103, Fresno, California, and shall continue from day to day thereafter, excluding Saturdays, Sundays and holidays, until completed:

///

NAME

DATE

HOOR

MILEY ABBY

03/2/17

9:00 a.m.

If an interpreter is required to translate testimony, notice of same must be given within five (5) days before deposition date, and the specific language and/or dialect designated.

NOTICE IS FURTHER GIVEN that the above-named deponent is required to bring with him/her and produce at the above-scheduled deposition, pursuant to Section 2025.280 of the California Code of Civil Procedure, any and all of the following items which he/she may have in his/her possession regarding the accident which is the subject matter of this lawsuit:

1. Any and all bills, reports, records, photographs or any other documents pertaining to injuries and medical treatment received by Plaintiff or claimed to have resulted from the subject accident/incident which is the subject of this litigation.

2. Any and all check stubs, time cards, payroll records, profit and loss summaries, balance sheets, accounting ledgers, tax records, or any other documents pertaining to any claim of loss of wages or profits as a result of the subject accident/incident.

3. Any and all photographs, estimates, repair bills, receipts, or any other documents pertaining to any property damage alleged to result from the subject accident/incident.

4. Any and all photographs, sketches, diagrams, or any other graphic representation of the scene or circumstances of the subject accident/incident.

5. Any and all written or recorded witness statements, statements by any defendant, investigation reports, or any other reports or documents pertaining to the facts or reconstruction of the subject accident/incident.

6. Any and all documents or records which pertain to or support any other claim of damages alleged to have resulted from the subject accident/incident.

7. Any and all insurance policies that provide for coverage or reimbursement for any of the damages or financial loss claimed to have been caused in the subject accident/incident.

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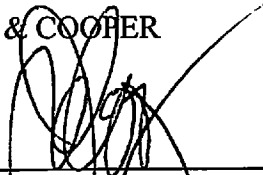
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1 8. By virtue of California Code of Civil Procedure §2025.220, deponent is requested
2 to bring to the deposition a typed list of the names and addresses of all hospitals, doctors and
3 health care providers from whom Plaintiff received treatment or consulted since the accident,
4 together with a list of claimed special damages to date.

5
6 Dated: February 13, 2017

COOPER & COOPER

7
8 By:



JOSEPH D. COOPER SR.
Attorneys for Defendants,
MARIO ALBERTO GUERRA
(erroneously sued herein as MARIO
ALBERTO GUERRO),
GUERRA PRODUCE and DANIEL
CANCHOLA

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12 N:\secty\70028.14\DISC\Depo.Notice.Miley Abby.wpd

3 **PROOF OF SERVICE**

4 I am a citizen of the United States of America, a resident of Fresno County, California,
5 over the age of eighteen 18 years and not a party to the within entitled cause or matter. My
6 business address is 7519 North Ingram Avenue, Suite 103, Fresno, California 93711. On the date
7 this document was executed, specified below, I served the foregoing **NOTICE OF TAKING**
8 **DEPOSITION OF MILEY ABBY**, to the parties in this action by serving ___ an original, X
9 a true copy as follows:

10 X **(By Mail)** I am readily familiar with the business practice at my place of business for
11 collection and processing of correspondence for mailing with the United States Postal
12 Service. Correspondence so collected and processed is deposited with the United States
Postal Service that same day in the ordinary course of business.

13 ___ **(By Overnight)** By placing the document(s) listed above in a sealed envelope, and placing
14 the same for overnight delivery by Federal Express at Fresno, California.

15 ___ **(By Hand)** I caused each envelope to be delivered by hand.

16 ___ **(By Telecopy)** I caused each document to be sent by telecopier.

17 *See attached "Service List"*

18 I declare under the penalty of perjury that the foregoing is true and correct. Executed and
19 served on February 13, 2017, at Fresno, California.
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21 
22 Sylvia Sais
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27
28

SERVICE LIST

Stephen Cornwell
Cornwell & Sample
7045 North Fruit
Fresno, CA 93711
Tel: (559) 431-3142
Fax: (559) 436-1135
Counsel for Plaintiffs, Cal LeDuc, et al.

Vincent Galvin
Ryan A. McCarthy
Anne Hanna, Esq.
Bowman & Brooke, LLP
1741 Technology Drive, Suite 200
San Jose, CA 95110
Tel: (408) 279-5393
Fax: (408) 279-5845
Counsel for Defendants,
Toyota Motor Corporation;
New United Motor Manufacturing, Inc.

Richard A. Belardinelli
Georgeson & Belardinelli
7060 N. Fresno Street, Suite 250
Fresno, CA 93720
Tel: (559) 447-8800
Fax: (559) 447-0747
Counsel for Plaintiffs, Cal LeDuc, et al.

Gregory S. Mason
McCormick Barstow
7647 N. Fresno Street
Fresno, CA 93720
Tel: (559) 433-1300
Fax: (559) 433-2300
Counsel for Defendants, TRQSS, Inc.;
TRW Automotive GMBH;
TRW Canada Limited

Mark P. Robinson, Jr.
Robinson Calcagnie Robinson
Shapiro Davis, Inc.
19 Corporate Plaza Drive
Newport Beach, CA 92660
Tel: (949) 720-1288
Fax: (949) 720-1292
Counsel for Plaintiffs, Cal LeDuc, et al.

David B. Weinstein
Philip McDaniel
WEINSTEIN TIPPETTS & LITTLE LLP
7500 San Felipe, Suite 500
Houston, TX 77063
Fax: (713)244-0801
Counsel for Defendants, TRQSS, Inc.;
TRW Automotive GMBH;
TRW Canada Limited

COURTESY COPY:

Atkinson-Baker
500 N. Brand Blvd.; 3rd Floor
Glendale, CA 91203
800.288.3376 | main
800.925.5910 | fax
abi@depo.com
www.depo.com