

1 Vincent Galvin (#104448)  
Anne O. Hanna (#120947)  
2 Ryan A. McCarthy (#233093)  
BOWMAN AND BROOKE LLP  
3 1741 Technology Drive, Suite 200  
San Jose, CA 95110-1364  
4 Telephone: (408) 279-5393  
Facsimile: (408) 279-5845  
5 Vincent.galvin@bowmanandbrooke.com  
Anne.hanna@bowmanandbrooke.com  
6 Ryan.mccarthy@bowmanandbrooke.com  
  
7 Attorneys for Defendants  
New United Motor Manufacturing, Inc.,  
8 General Motors LLC and Toyota Motor Corporation

9 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF FRESNO

11 CAL LeDUC; TORI ABBY; MILEY ABBY, a ) Case No. 13CECG03811 MWS  
minor, by and through her Guardian ad Litem )  
12 TORI ABBY; MANDY JOBE; LUKUS LeDUC; ) Assigned for all purposes to Hon. Mark W. Snauffer  
JAY LeDUC; and CAL LeDUC as successor in )  
13 interest to the estate of Marsha Kay LeDuc, ) AMENDED NOTICE OF TAKING DEPOSITIONS  
)  
14 Plaintiffs, )  
)  
15 vs. )  
)  
16 GENERAL MOTORS LLC; TOYOTA MOTOR )  
CORPORATION; NEW UNITED MOTOR )  
17 MANUFACTURING, INC.; TRQSS, INC. (F/K/A )  
QUALITY SAFETY SYSTEMS COMPANY); )  
18 TRW AUTOMOTIVE GMBH (F/K/A TRW )  
GmbH; F/K/A TRW Repa GmbH) TRW )  
19 CANADA LIMITED; MARIO ALBERTO )  
GUERRA; DANIEL M. CANCHOLA; GUERRA )  
20 PRODUCE; and DOES 1 to 50, inclusive, )  
)  
21 Defendants. )

22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that, pursuant to California Code of Civil Procedure § 2025.010 et  
24 seq., defendant Toyota Motor Corporation will take the following depositions:

25	<u>Deponent</u>	<u>Date</u>	<u>Time</u>
26	Drew Spafford	March 15, 2016	11:00 a.m.
27	Carlos Gutierrez	March 15, 2016	1:00 p.m.
28	Seth Brown	March 15, 2016	2:30 p.m.

Brandon Markle

March 15, 2016

4:00 p.m.

The depositions of Drew Spafford, Carlos Gutierrez, Seth Brown and Brandon Markle will take place at Central Valley Reporters, 1320 E. Shaw Avenue, Suite 168, Fresno, CA 93710. The remainder of the depositions listed below will take place at Holiday Inn, 375 S. Alta Avenue, Dinuba, California.

Deponent	Date	Time
Adrian Agavo	March 16, 2016	9:00 a.m.
Cesar Gutierrez	March 16, 2016	10:30 a.m.
Ray Sandoval	March 16, 2016	1:00 p.m.
Andrew Rios	March 16, 2016	2:30 p.m.

If said depositions are not completed on said date, the taking thereof will continue from day-to-day thereafter, at the same commencement time and place, Sunday and Holidays excepted, until completed.

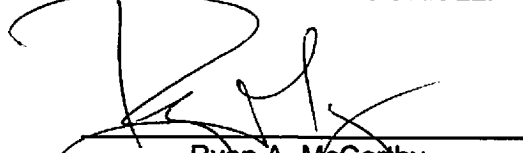
The depositions will be taken on oral examination before a deposition officer authorized to administer oaths in the State of California pursuant to § 2025.330 of the California Code of Civil Procedure. The depositions may be videotaped.

The witnesses are requested and required, under CCP §§ 2025.220 and 2025.280(a), to bring with them to their deposition the following documents:

All documents, including notes, reports, photographs and other writings or physical evidence, concerning their response to the accident that occurred on June 12, 2013 at Alta Avenue, 566 feet North of Manning Avenue in unincorporated area of Fresno County involving plaintiff (CHP 2013-06-0107), (Fresno and Reedley Fire Report No. 0007665).

Dated: February 23, 2016

BOWMAN AND BROOKE LLP



Ryan A. McCarthy  
Attorneys for Defendants  
New United Motor Manufacturing, Inc.,  
General Motors LLC and Toyota Motor Corporation

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093</b> <b>Bowman and Brooke LLP</b> <b>1741 Technology Drive, Suite 200</b> <b>San Jose, CA 95110-1355</b> TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>Defendant Toyota Motor Corporation</b>		FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno</b> STREET ADDRESS: <b>1130 "O" Street</b> MAILING ADDRESS: CITY AND ZIP CODE: <b>Fresno, CA 93724</b> BRANCH NAME:		
PLAINTIFF/PETITIONER: <b>Cal LeDuc, et al.</b> DEFENDANT/RESPONDENT: <b>New United Motor Manufacturing, Inc. , et al.</b>		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		
		CASE NUMBER: <b>13CECG03811</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Drew Spafford, Sequoia Safety Council, Ambulance, 500 E. 11<sup>th</sup> Street, Reedley, CA 93654; Telephone: (559) 638-9995

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 15, 2016 Time: 11:00 a.m. Address: Central Valley Reporters, 1320 E. Shaw Avenue, Suite 168, Fresno, CA 93710

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows:  
 All documents, including notes, reports, photographs and other writings or physical evidence, concerning their response to the accident that occurred on June 12, 2013 at Alta Avenue, 566 feet North of Manning Avenue in unincorporated area of Fresno County involving plaintiff (Fresno and Reedley Fire Report No. 0007665).  
☐ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:  
☐ Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
6. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: February 23, 2016

Ryan A. McCarthy

(TYPE OR PRINT NAME)

(Proof of service on reverse)

Attorney

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

Page 1 of 2

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093 Bowman and Brooke LLP 1741 Technology Drive, Suite 200 San Jose, CA 95110-1355 TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant Toyota Motor Corporation		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:		
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc., et al.		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		
		CASE NUMBER: 13CECG03811

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Carlos Gutierrez (ID 16507), CHP, 1182 W. Olive Avenue, Fresno, CA 93728; telephone: (559) 441-5441

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 15, 2016	Time: 1:00 p.m.	Address: Central Valley Reporters, 1320 E. Shaw Avenue, Suite 168, Fresno, CA 93710
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- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
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- ☐ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:  
☐ Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
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Date issued: February 23, 2016

Ryan A. McCarthy

Attorney

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093 Bowman and Brooke LLP 1741 Technology Drive, Suite 200 San Jose, CA 95110-1355 TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant Toyota Motor Corporation		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:		
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc. , et al.		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		
		CASE NUMBER: 13CECG03811

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Capt. Seth Brown, Fresno County Fire Protection / Cal Fire, 210 S. Academy Avenue, Sanger, CA 93657; Telephone:  
 (559) 485-7500

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:

Date: March 15, 2016	Time: 2:30 p.m.	Address: Central Valley Reporters, 1320 E. Shaw Avenue, Suite 168, Fresno, CA 93710
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- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
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☐ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:  
☐ Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
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Date issued: February 23, 2016

Ryan A. McCarthy

(TYPE OR PRINT NAME)

(Proof of service on reverse)

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093</b> <b>Bowman and Brooke LLP</b> <b>1741 Technology Drive, Suite 200</b> <b>San Jose, CA 95110-1355</b> TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): <b>Defendant Toyota Motor Corporation</b>	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno</b> STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:	
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc. , et al.	
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>	
CASE NUMBER: <b>13CECG03811</b>	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Brandon Markle, Fresno County Fire Protection / Cal Fire, 210 S. Academy Avenue, Sanger, CA 93657; Telephone:  
 (559) 485-7500

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 15, 2016	Time: 4:00 p.m.	Address: Central Valley Reporters, 1320 E. Shaw Avenue, Suite 168, Fresno, CA 93710
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- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
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(TYPE OR PRINT NAME)

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Attorney

(TITLE)

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<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno</b> STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:		
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc. , et al.		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		
		CASE NUMBER: <b>13CECG03811</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Adrian Agayo, Reedley Fire Dept., 1060 D. Street, Reedley, CA 93654; Telephone: (559) 637-4230

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 16, 2016 Time: 9:00 a.m. Address: Holiday Inn, 375 S. Alta Avenue, Dinuba, CA

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
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Ryan A. McCarthy

(TYPE OR PRINT NAME)

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093 Bowman and Brooke LLP 1741 Technology Drive, Suite 200 San Jose, CA 95110-1355 TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant Toyota Motor Corporation		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:		
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc. , et al.		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		CASE NUMBER: 13CECG03811

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Cesar Gutierrez, Reedley Fire Dept., 1060 D. Street, Reedley, CA 93654; Telephone: (559) 637-4230

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 16, 2016 Time: 10:30 am Address: Holiday Inn, 375 S. Alta Avenue, Dinuba, CA

- ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
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☐ Continued on Attachment 3.
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☐ Continued on Attachment 4.
  - IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**
  - At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.*

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF \$500 AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: February 23, 2016

Ryan A. McCarthy

(TYPE OR PRINT NAME)

(Proof of service on reverse)

Attorney

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TITLE)

Page 1 of 2

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): <b>Vincent Galvin #104448/Anne O. Hanna #120947/ Ryan A. McCarthy #233093</b> <b>Bowman and Brooke LLP</b> <b>1741 Technology Drive, Suite 200</b> <b>San Jose, CA 95110-1355</b> TELEPHONE NO.: 408.279.5393 FAX NO. (Optional): 408.279.5845 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Defendant Toyota Motor Corporation		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF <b>Fresno</b> STREET ADDRESS: 1130 "O" Street MAILING ADDRESS: CITY AND ZIP CODE: Fresno, CA 93724 BRANCH NAME:		
PLAINTIFF/PETITIONER: Cal LeDuc, et al. DEFENDANT/RESPONDENT: New United Motor Manufacturing, Inc. , et al.		
<b>DEPOSITION SUBPOENA</b> <b>FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS</b>		
		CASE NUMBER: <b>13CECG03811</b>

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):  
 Ray Sandoval, Sequoia Safety Council, Ambulance, 500 E. 11<sup>th</sup> Street, Reedley, CA 93654; Telephone: (559) 638-9995

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:**

Date: March 16, 2016 Time: 1:00 p.m. Address: Holiday Inn, 375 S. Alta Avenue, Dinuba, CA

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows:  
 All documents, including notes, reports, photographs and other writings or physical evidence, concerning their response to the accident that occurred on June 12, 2013 at Alta Avenue, 566 feet North of Manning Avenue in unincorporated area of Fresno County involving plaintiff (Fresno and Reedley Fire Report No. 0007665).  
☐ Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:  
☐ Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
6. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition. Unless the court orders or you agree otherwise, if you are being deposed as an individual, the deposition must take place within 75 miles of your residence or within 150 miles of your residence if the deposition will be taken within the county of the court where the action is pending. The location of the deposition for all deponents is governed by Code of Civil Procedure section 2025.250.

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Date issued: February 23, 2016

Ryan A. McCarthy

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

**Bowman and Brooke LLP**  
1741 Technology Drive, Suite 200  
San Jose, CA 95110-1355

TELEPHONE NO.: 408.279.5393

FAX NO. (Optional): 408.279.5845

**E-MAIL ADDRESS (Optional):**

ATTORNEY FOR (Name): Defendant Toyota Motor Corporation

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF Fresno**

STREET ADDRESS: 1130 "O" Street

MAILING ADDRESS:

CITY AND ZIP CODE: Fresno, CA 93724

BRANCH NAME:

PLAINTIFF/PETITIONER: Cal LeDuc, et al.

**DEFENDANT/RESPONDENT:** New United Motor Manufacturing, Inc. , et al.

**FOR COURT USE ONLY**

**DEPOSITION SUBPOENA  
FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS**

**CASE NUMBER:**

13CECG03811

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**

Andrew Rios, Sequoia Safety Council, Ambulance, 500 E. 11<sup>th</sup> Street, Reedley, CA 93654; Telephone: (559) 638-9995

**1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS** in this action at the following date, time, and place:

Date: March 16, 2016      Time: 2:30 p.m.      Address: Holiday Inn, 375 S. Alta Avenue, Dinuba, CA

- a. ☐ As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.230.)
- b. ☒ You are ordered to produce the documents and things described in item 3.
- c. ☒ This deposition will be recorded stenographically ☐ through the instant visual display of testimony and by ☐ audiotape ☐ videotape.
- d. ☐ This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
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**Date issued: February 23, 2016**

**Ryan A. McCarthy**

Attorney

(SIGNATURE OF PERSON ISSUING SUBPOENA)

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(TITLE)

Page 1 of 2

Form Adopted for Mandatory Use  
Judicial Council of California  
SUBP-020 (Rev. January 1, 2009)

**DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE  
AND PRODUCTION OF DOCUMENTS AND THINGS**

Code of Civil Procedure §§ 2020.510,  
2025.220, 2025.230, 2025.250, 2025.620;  
Government Code, § 68097.1  
[www.courtinfo.ca.gov](http://www.courtinfo.ca.gov)

3 PROOF OF SERVICE

4 I am over 18 years of age, not a party to this action and employed in San Jose,  
5 California at 1741 Technology Drive, Suite 200, San Jose, California 95110-1355.

6 On February 24, 2016, I served the foregoing documents described as AMENDED NOTICE OF  
7 TAKING DEPOSITIONS on all interested parties, or through their attorneys of record, in the manner  
8 noted, addressed as follows:

9 **Attorney for Plaintiffs**

10 Stephen R. Cornwell  
11 Cornwell & Sample, LLP  
12 7045 N. Fruit Avenue  
13 Fresno, CA 93711-0761

14 Richard A. Belardinelli  
15 Georgeson and Belardinelli  
16 7060 N. Fresno Street, Suite 250  
17 Fresno, CA 93720

18 Mark P. Robinson, Jr.  
19 Robinson Calcagnie Robinson  
20 Shapiro Davis, Inc.  
21 19 Corporate Plaza Drive  
22 Newport Beach, CA 92660

23 **Attorneys for Defendants TRQSS, Inc.**  
24 **and TRW Canada Limited**

25 Gregory S. Mason  
26 Attorneys at Law  
27 7647 N. Fresno Street  
28 Fresno, CA 93720

David Weinstein  
Weinstein Tippetts & Little LLP  
7500 San Felipe, Suite 500  
Houston, TX 77063

**Attorneys for Defendants Mario**  
**Alberto Guerra, Daniel M. Canchola**  
**and Guerra Produce**

Joseph D. Cooper  
Cooper & Cooper  
7519 N. Ingram Avenue, Suite 103  
Fresno, CA 93711

1 XX VIA FIRST CLASS MAIL. I caused such envelope to be deposited in the mail at San  
Jose, California, in a sealed envelope with postage fully prepaid thereof. I am readily familiar  
2 with the firms business practice for collection and processing of correspondence for mailing  
with the United States Postal Service. The mail is deposited with the U.S. Postal Service on  
3 that same day in the ordinary course of business. I am aware that on motion of the party  
served, service is presumed invalid if the postal cancellation date or postage meter date is more  
4 than one day after the date of deposit for mailing in affidavit.

5      VIA OVERNIGHT DELIVERY SERVICE. The documents were enveloped, properly  
labeled, and caused to be deposited into an overnight delivery (Federal Express, United Parcel  
6 Service, etc.) receptacle or delivered to an authorized courier or driver authorized by the  
express service carrier to receive documents, in an envelope or a package designated by the  
7 express service carrier with delivery fees paid or provided for, addressed to the person on  
whom it is to be served, at the office address as last given by that person on any document filed  
8 in the case and served on that person; otherwise, at that person's place of residence.

9      BY ELECTRONIC SERVICE. The document was served electronically and the  
transmission was reported as complete and without error.

10      VIA FACSIMILE TRANSMISSION. The document was served on the above party in  
11 this action by causing a true copy of said document to be transmitted by facsimile to the  
number listed adjacent to the name on this Proof of Service. The transmission was reported as  
12 complete and without error.

13      VIA PERSONAL SERVICE. I caused such envelope(s) to be delivered by hand this date  
to the offices of the addressee(s).

14 I declare under penalty of perjury under the laws of the State of California that the  
15 foregoing is true and correct, and that this declaration was executed on February 24, 2016, at  
16 San Jose, California.

17  
18   
19 Rebecca A. Fuller  
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26  
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