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

11
12 SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO
13 CENTRAL DIVISION

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

20 Plaintiffs,

21 v.

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

Defendants.

CASE NO.: 13 CE CG 03811 MWS

NOTICE OF TAKING DEPOSITION

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NOTICE OF TAKING DEPOSITION

1 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 NOTICE IS HEREBY GIVEN THAT said Plaintiffs herein will take the
3 deposition of **ERIC ARREDONDO**, 1645 E. Duff Avenue, Reedley, CA 93654 (559)
4 318-6385, upon oral examination on May 29, 2014, commencing at 1:00 p.m., at the
5 offices of Cornwell & Sample, LLP, located at 7045 N. Fruit Avenue, Fresno, California,
6 before a Certified Shorthand Reporter.

7 Said deposition will **not** be recorded by audio or video tape.

8 If said deposition is not completed on said date, the taking thereof will be
9 continued from day to day thereafter at the same place, Sundays and holidays excepted,
10 until completed.

11 If any interpreter is required to translate testimony, notice of the same must
12 be given within five days before the deposition date and the specific language and or
13 dialect designated.

14
15 DATED: May 14, 2014.

CORNWELL & SAMPLE, LLP

16
17
18 By: 

Stephen R. Cornwell
Attorneys for Plaintiffs

19 CAL LeDUC; TORI ABBY; MILEY ABBY,
20 a minor, by and through her Guardian ad
21 Litem TORI ABBY; MANDY JOBE;
22 LUKUS LeDUC; JAY LeDUC; and
23 CAL LeDUC as successor in interest to the
24 estate of Marsha Kay LeDuc

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NOTICE OF TAKING DEPOSITION

ERIC ARREDONDO (559) 318-6385
1645 E. Duff Avenue, Reedley, California 93654

Date: May 29, 2014 Time: 1:00 p.m. Address: 7045 N. Fruit Avenue
Fresno, California 93711

3. 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.

CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE
RESULTING FROM YOUR FAILURE TO OBEY.


(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney at Law
(TITLE)

LP0001179

PLAINTIFF/PETITIONER: CAL LeDUC, et al.	CASE NUMBER:
DEFENDANT/RESPONDENT: GENERAL MOTORS CORPORATION, et al.	13 CE CG 03811 MWS

PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE

1. I served this *Deposition Subpoena for Personal Appearance* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. Witness fees and mileage both ways (check one):

(1) ☐ were paid. Amount: \$ _____

(2) ☐ were not paid.

(3) ☐ were tendered to the witness's
public entity employer as
required by Government Code
section 68097.2. The amount
tendered was (specify): \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server

b. ☐ California sheriff or marshal

c. ☐ Registered California process server

d. ☐ Employee or independent contractor of a registered California process server

e. ☐ Exempt from registration under Business and Professions Code section 22350(b)

f. ☐ Registered professional photocopier

g. ☐ Exempt from registration under Business and Professions Code section 22451

h. Name, address, telephone number, and, if applicable, county of registration and number:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date:



(SIGNATURE)



(SIGNATURE)

1 **PROOF OF SERVICE**

2 I am a resident of the State of California, over the age of eighteen years,
3 and not a party to the within action. My business address is 7045 N. Fruit Avenue,
4 Fresno, California. On May 14, 2014, I served the within documents:

5 ***NOTICE OF TAKING DEPOSITION***

6 ☐

BY FAX: by transmitting via facsimile the document(s) listed above to the fax number(s) set forth below on this date before 5:00 p.m.

7 ☐

BY HAND: by personally delivering the document(s) listed above to the person(s) at the address(es) set forth below.

8 ☒

9 **BY MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States mail at Fresno, California addressed as set forth below.

10 ☐

11 **BY OVERNIGHT MAIL:** by causing document(s) to be picked up by an overnight delivery service company for delivery to the addressee(s) on the next business day.

12 ☐

13 **BY PERSONAL DELIVERY:** by causing personal delivery by
14 _____ of the document(s) listed above to the person(s) at the address(es) set forth below

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18 Gregory S. Mason
19 MCCORMICK BARSTOW
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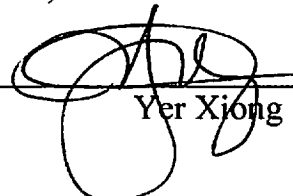
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Facsimile: (559) 442-1659

21
22 I am readily familiar with the firm's practice of collection and processing
23 correspondence for mailing. Under that practice it would be deposited with the U.S.
24 Postal Service on that same day with postage thereon fully prepaid in the ordinary course
25 of business. I am aware that on motion of the party served, service is presumed invalid if
postal cancellation date or postage meter date is more than one day after date of deposit
for mailing in affidavit.

26 I declare under penalty of perjury under the laws of the State of California
27 that the above is true and correct.

28 Executed on May 14, 2014, at Fresno, California.



Yee Xiong