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5

6 Attorneys for Defendants
New United Motor Manufacturing, Inc.,
7 General Motors LLC and Toyota Motor Corporation

8 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF FRESNO

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

21
22 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

23 PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure § 2025.010 et seq.,
24 defendant New United Motor Manufacturing, Inc. cross-notices the following deposition at the offices of
25 Cornwell & Sample, LLP, 7045 N. Fruit Avenue, Fresno, CA:

26	<u>Deponent</u>	<u>Date</u>	<u>Time</u>
27	Eric Arredondo	July 24, 2014	10:00 a.m.

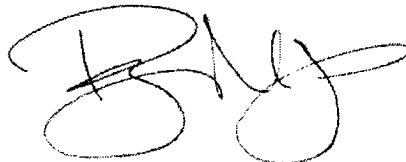
28 ///

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

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

7 Dated: July 10, 20143

BOWMAN AND BROOKE LLP

A handwritten signature in black ink, appearing to read 'R. McCarthy', is written over a horizontal line.

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

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 July 10, 2014, I served the foregoing documents described as CROSS-NOTICE OF
7 TAKING DEPOSITION OF ERIC ARREDONDO on all interested parties, or through their attorneys of
8 record, in the manner noted, addressed as follows:

9 **Attorney for Plaintiffs**

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

12 Richard A. Belardinelli
Georgeson, Belardinelli & Noyes
13 7060 N. Fresno Street, Suite 250
Fresno, CA 93720

14 **Attorneys for Defendants TRQSS, Inc.**
15 **and TRW Canada Limited**

16 Gregory S. Mason
Attorneys at Law
7647 N. Fresno Street
17 Fresno, CA 93720

18 David Weinstein
Weinstein Tippetts & Little LLP
19 7500 San Felipe, Suite 500
Houston, TX 77063

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

22 Joseph D. Cooper
Cooper & Cooper
23 7519 N. Ingram Avenue, Suite 103
Fresno, CA 93711

24 XX VIA FIRST CLASS MAIL. I caused such envelope to be deposited in the mail at San
25 Jose, California, in a sealed envelope with postage fully prepaid thereof. I am readily familiar
26 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
27 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
28 than one day after the date of deposit for mailing in affidavit.

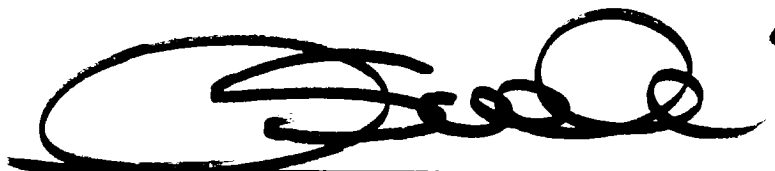
1 ____ VIA OVERNIGHT DELIVERY SERVICE. The documents were enveloped, properly
2 labeled, and caused to be deposited into an overnight delivery (Federal Express, United Parcel
3 Service, etc.) receptacle or delivered to an authorized courier or driver authorized by the
4 express service carrier to receive documents, in an envelope or a package designated by the
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
in the case and served on that person; otherwise, at that person's place of residence.

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

7 ____ VIA FACSIMILE TRANSMISSION. The document was served on the above party in
8 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
complete and without error.

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

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct, and that this declaration was executed on July 10, 2014, at San
13 Jose, California.

A handwritten signature in black ink, appearing to read 'Ann Scoleri', written over a horizontal line.

Ann Scoleri