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7 **IN THE SUPERIOR COURT OF THE STATE OF WASHINGTON**
8 **IN AND FOR THE COUNTY OF PIERCE**

9 ELIZABETH GANACIAS,

10 Plaintiff,

11 vs.

12 FENCE DOCTOR, LLC, a Washington
13 corporation

14 Defendant.

NO. 15-2-12679-8

**FIRST AMENDED NOTICE OF CR
30(B)(6) DEPOSITION OF
REPRESENTATIVE OF DEFENDANT
FENCE DOCTOR, LLC**

15 TO: CR 30(b)(6) Representative of Fence Doctor, LLC

16 AND TO: Gregory S. Latendresse, Counsel of Record for Defendants.

17
18 **PLEASE TAKE NOTICE** that pursuant to Civil Rule 30(b)(6), Plaintiff will take the
19 deposition of the CR 30(b)(6) representative(s) of Fence Doctor, LLC. Pursuant to CR 30(b)(6),
20 Plaintiff demands that Defendant Fence Doctor, LLC identify such officers, directors, managing
21 agents, or other person to be deposed upon oral examination before a court reporter, at Preg
22 O'Donnell & Gillett, located at 901 5th Avenue Suite 3400, Seattle, Washington 98164, on
23 **Tuesday, March 8, 2016, at 11:00 AM**, the said oral examination to be subject to a continuance
24 or adjournment from time to time or place to place until completed, and to be taken on the grounds
25 and for the reason the said witness will give evidence material to the establishment of Plaintiff's
26 case.
27

Pursuant to CR 30(b)(6), please designate on or more persons to testify regarding the following subjects. Person(s) most knowledgeable with respect to:

1. Responses to Plaintiff's First Interrogatories and Requests for Production of Documents to Defendant;
2. The communication between The Fence Doctor, LLC and Cascade Regional Blood Service ("CRBS");
3. Installation guidelines and industry standards with respect to the "center stop";
4. The incident involving Plaintiff; and
5. Prior similar incidents.

HEREIN FAIL NOT AT YOUR PERIL.

DATED this 16th day of February, 2016.

CERTA LAW GROUP, INC., P.S.



Pellegrino L. Certa, WSBA No. 25903
Cheryl J. Farrish, WSBA No. 41698
Attorneys for Plaintiff

1 **CERTIFICATE OF SERVICE**

2 The undersigned hereby certifies under the penalty of perjury under the laws of the State
3 of Washington that on this 16th day of February, 2016, I caused the attached document to be served
4 in the manner noted below a true and correct copy of the foregoing on the parties mentioned below
5 as indicated:

6 Gregory S. Latendresse WSBA No.: 32787
7 Preg O'Donnell & Gillett PLLC
8 901 5th Ave. Suite 2400
Seattle, WA 98164-2026

☐ U.S. First Class Mail
☐ Facsimile
☒ Electronic Mail
☐ Legal Messenger

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10
11 DATED: February 16, 2016.



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13 _____
Sasha Craft, Paralegal