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Plaintiff in Pro Per

SUPERIOR COURT OF THE STATE OF CALIFORNIA,
COUNTY OF SAN BERNARDINO

Michael James Romero,
Plaintiff,
vs.
Megan Nicole Bentley,
Defendant

Case No. CIVRS2501874
Assigned Judge: Hon. Kory Mathewson
8303 Haven Avenue
Rancho Cucamonga, CA 91730
Dept R12

**AMENDED NOTICE OF TAKING DEPOSITION OF DEFENDANT
(PARTY)**

(With Document Requests to Bring to the Deposition)

TO: Defendant **Megan Nicole Bentley** and her counsel of record, **Randal P. Hannah**

PLEASE TAKE NOTICE that, under **CCP §§ 2025.210 et seq.**, Plaintiff **Michael James Romero** will take the deposition on oral examination of Defendant **Megan Nicole Bentley** as follows:

- **Deponent:** Megan Nicole Bentley
- **Date:** Tuesday, October 21, 2025
- **Time:** 9:00 a.m.
- **Place / Address (CRC 3.1010; CCP § 2025.220):** The deposition will proceed by remote videoconference (**Zoom**). For statutory “place” purposes, the **deposition officer’s business address** is: [Reporting Firm Name], [Street Address], [City, CA ZIP].
- **Remote / Attendance Protocol (CRC 3.1010):** Any party/attorney may attend remotely. Any party/attorney may be **physically present with the deponent** by serving **five (5) court days’ written notice**; the deponent’s attorney may be physically present **without notice**. **Identify on the record** any other person in the room with the deponent or communicating with the deponent during testimony.
- **Reporting / Recording (CCP §§ 2025.220(a)(5)–(6), 2025.330):** The deposition will be recorded stenographically by a California CSR and by video.
- **Oath (CCP § 2025.310):** The deposition officer may administer the oath **remotely**.
- **Interpreter:** None anticipated.
- **Estimated Length:** 2–4 hours.

Note: This Amended Notice does not change the previously noticed **date or time**; it cures technical items (place/address and remote protocol).

REQUESTS FOR PRODUCTION TO BRING TO THE DEPOSITION

(Party—CCP §§ 2025.220(a)(4), 2025.280)

Produce the following documents in your **possession, custody, or control**. If anything is withheld, **identify it and state the basis** (e.g., privilege). If any responsive item **once existed but cannot be located**, state the **last known custodian, approximate dates, and the disposition** (e.g., deleted, replaced, lost).

1 **1. Bank Statements (June 2019).**

2 Bank statement(s) for **June 2019** for any account you used to **pay or receive funds**
3 **related to the transaction(s) at issue**. You may redact account numbers except the **last**
4 **four digits**, but **do not** redact dates, amounts, payee/description lines, or running
5 balance.

6 **2. Text Messages—Narrow Windows.**

7 Complete, **unedited** message threads for:

- 8 a. **Defendant ↔ Michael James Romero: June 22–25, 2019;**
9 b. **Defendant ↔ Kimberly Dodder (seller of the item/animal at issue): June 25, 2019;**
10 c. **Defendant ↔ John Bentley (brother): June 25, 2019** (you may **narrowly redact**
11 purely private, non-transactional content and identify redactions on a simple log).

12 **3. Google Location History (“Timeline”).**

13 **June 25, 2019** only, associated with any Google account you used that date.

14 **4. Photos / Videos — June 25, 2019.**

15 All photos/videos captured on **June 25, 2019** that depict: (i) the dog, seller (**Kimberly**
16 **Dodder**), meeting place, or transaction; (ii) either party or the seller; (iii) vehicles used to
17 travel to/from the meeting; or (iv) locations/whereabouts **within +/- 3 hours** of the
18 meeting.

19 **All responsive items must be produced at the deposition.** If, despite diligent efforts, any item
20 cannot be produced at that time, **identify it on the record** and state the specific reason. Absent a
21 written stipulation or court order, any supplemental production remains subject to all applicable
22 discovery deadlines. Plaintiff reserves all remedies, including seeking a limited continuation
23 solely for those materials, preclusion, sanctions, and other appropriate court relief.

24
25 If you contend any responsive item is not in your possession, custody, or control, **identify the**
26 **custodian** (e.g., bank, carrier, Google) and what efforts you made to obtain it.

1 **FORM OF PRODUCTION (ESI) (CCP § 2025.220(a)(7))**

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- 3 • **Bank statements:** Original paper statements or **native PDFs** downloaded from the
- 4 financial institution.
- 5 • **Texts: Native export** from the device/platform (preferred) or **full-screen screenshots**
- 6 showing participants' names/numbers and timestamps in **chronological order**; include
- 7 the conversation **info page** (names/numbers).
- 8 • **Google Timeline: Google Takeout** export limited to **June 25, 2019 (JSON/KML)** or
- 9 **PDFs** of that day's Timeline map/details; please also include **Settings.json** for the
- 10 account (reflects last-modified and any auto-delete window).
- 11 • **Photos/Videos: Original files** (e.g., .heic/.jpg/.mov) with **EXIF metadata intact**
- 12 (capture date/time, device, GPS where available). If export strips metadata, include a
- 13 short **metadata log** (filename, capture time/device, export method).
- 14 • **Privacy:** For the brother thread and photos/videos, you may **narrowly redact/blur**
- 15 purely private content unrelated to the transaction and identify redactions on a simple log.
- 16 **Use is limited to this case.**
- 17 • **Exhibits:** May be **pre-marked** or **shared electronically** during the deposition.
- 18 • **Breaks: Reasonable breaks** on request; **no break while a question is pending** except
- 19 for privilege or urgent needs. **No off-camera communications** with the deponent during
- 20 questioning.

21 **DISCLOSURE RE REPORTING-AGENCY CONTRACTS (CCP § 2025.220(a)(8))**

22 Plaintiff is unaware of any contract between Plaintiff or any **third party** and the deposition

23 officer/reporting agency for any service beyond this noticed deposition. **No third party is**

24 **paying for or funding any portion of this deposition or this action.**

25 Dated: **October 16, 2025**

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27 Michael James Romero, Plaintiff In Pro Per

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1 *Service:* This Notice will be **electronically served** on Defendant's counsel on **October 16, 2025**.

2 *Proof of Service:* A signed Proof of Service will be maintained by Plaintiff and produced or filed
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