

1 Michael Romero
2 304 W Avenue 43,
3 Los Angeles, CA 90065
4 (909) 201-1181
5 mikeromero4@Yahoo.com

6
7 Plaintiff in Pro Per
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA,
10 COUNTY OF SAN BERNARDINO
11
12

13 Michael James Romero,
14 Plaintiff,
15 vs.
16 Megan Nicole Bentley,
17 Defendant

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

19
20 **AMENDED NOTICE OF TAKING DEPOSITION OF DEFENDANT**
21 **(PARTY)**

22 **(With Document Requests to Bring to the Deposition)**

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

24
25 PLEASE TAKE NOTICE that, under CCP §§ 2025.210 et seq., Plaintiff **Michael James**
26 **Romero** will take the deposition on oral examination of Defendant **Megan Nicole Bentley** as
27 follows:
28

- **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.

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.

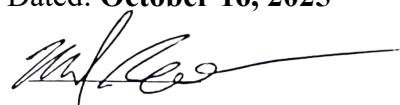
1 **FORM OF PRODUCTION (ESI) (CCP § 2025.220(a)(7))**

- 2
- 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
26 Dated: **October 16, 2025**



27
28 Michael James Romero, Plaintiff In Pro Per

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
3 if required.
4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28