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2 IN THE SUPERIOR COURT FOR THE STATE OF ALASKA
3 THIRD JUDICIAL DISTRICT AT ANCHORAGE

4 RICHARD FISHER,)

5)
6 Plaintiff,)

7 vs.)

8 AETNA LIFE INSURANCE CO.,)

9) Case No. 3AN-97-291 Civil
10 Defendant.)
11 _____)

12 **AFFIDAVIT OF ANGELA PEDIGO**

13 Angela Pedigo, first being duly sworn, deposes and states as follows:

14 1. I am employed by the Law Offices of Friedman, Rubin & White

15 2. On October 13, 1998, I contacted Tim Adair at the State of Alaska
16 Retirement and Benefits office in Juneau. I asked him for the number of local
17 government employees that were enrolled in the State of Alaska Supplemental Benefits
18 System.
19

20 3. I was told that the number of local government employees enrolled in SBS
21 has not been calculated, but that there are 15 local government entities that participate
22 in SBS.
23

24 4. The local government entities are: Matanuska Susitna Borough, Matanuska
25 Susitna Schools, City of Haines, Denali Schools, City of Sitka, City of Wasilla, Sitka
26 Schools, Sitka Hospital, City of St. Paul, Copper River Basin, Bristol Bay CRSA
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28

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Kevin F. Calcagnie, California Bar No. 108994
Attorneys for Plaintiff

SUPERIOR COURT OF THE STATE OF ARIZONA
FOR THE COUNTY OF MARICOPA

LYNNA S. BELIN, a single woman,

Plaintiff,

vs.

FORD MOTOR COMPANY; THE)
STATE OF ARIZONA; DEPARTMENT)
OF TRANSPORTATION OF THE)
STATE OF ARIZONA; BLACK AND)
WHITE CORPORATIONS I-X; ABC)
PARTNERSHIPS X-XX; JANE DOES)
XX-XXX AND JOHN DOES XXX-L,)

Defendants.

Case No.: CV 97-23670

**NOTICE OF DEPOSITION OF FORD
MOTOR COMPANY PURSUANT TO RULE
30(b)(6) AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

(Assigned to the Honorable
NORMAN D. HALL)

NOTICE is hereby given pursuant to Rule 26 Rule 30(b)(6) of the Arizona Rules of Civil Procedure, that the deposition of Ford Motor Company will be taken upon oral examination on _____ at 10:00 a.m. at the law offices of Scott A. McKay, P.C., 2111 East Highland, Suite 230, Phoenix, Arizona 85016, before an officer authorized by law to administer oaths. Plaintiff will seek testimony from Ford Motor Company concerning the following matters:

//

IN THE CIRCUIT COURT OF ST. CLAIR COUNTY, ALABAMA

GARY L. SIMMONS, as Administrator of
the Estate of Helen L. Simmons, an
individual,

Plaintiff,

v.

GENERAL MOTORS CORPORATION,
a corporation, AGROTORS, INC., a
corporation, JOHN HANCOCK TIMBER
RESOURCES CORPORATION, a
Corporation and RONALD LEOPARD,
an Alabama Resident,

Defendants.

CV-06-130

**PLAINTIFF'S OPPOSITION TO DEFENDANT'S
PROPOSED PROTECTIVE ORDER**

COMES NOW the Plaintiffs and request this Honorable Court to deny in full
Defendant General Motors Corporation's ("GM") motion for a protective order concerning
Plaintiff's First Requests for Production.

1. Because the Defendants did not make any attempt to resolve any pending discovery issues prior to making a motion before this Honorable Court, the Defendant's Motion for Protective Order must be denied.
2. The Defendants conveniently overlook the first requisite of obtaining a protective order, namely that "a motion for a protective order **shall** be accompanied by a statement of the attorney for the moving party, stating that the attorney, **before filing the motion**, has endeavored to resolve the subject of the discovery motion. . .with the opposing party." Ala. R. Civ. P. 26 (c) (emphasis added).