

**VIRGINIA:**

**IN THE CIRCUIT COURT FOR THE CITY OF ALEXANDRIA**

**ARTURO ANTEZANA-CASTRO,**

**Plaintiff,**

**v.**

**QUYEN DAO, DDS, et al.,**

**Defendants.**

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**Case No.: CL 15-3677**

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**FIRST AMENDED NOTICE OF ORAL DEPOSITION  
OF DEFENDANT QUYEN DAO, DDS**

COMES NOW Plaintiff Arturo Antezana-Castro, by and through his undersigned counsel, and pursuant to the Rules of the Supreme Court of Virginia, and hereby gives notice that his attorney will take the deposition of Defendant **QUYEN DAO, DDS** on **April 20, 2017 beginning at 10:00 a.m.** The deposition will be held at the offices of **Hancock, Daniel, Johnson & Nagle, PC, 3975 Fair Ridge Drive, Suite 475 South, Fairfax, VA 22033**, before a notary public or other officer duly authorized to administer oaths in the Commonwealth of Virginia, and **may be recorded by audiovisual means.** The taking of the deposition will continue day to day until such time as it is deemed complete.

**NOTICE TO DEPONENT**

**Defendant shall produce at deposition the following:**

1. All original documents and things responsive to Plaintiff's First Request for Production of Documents;
2. All documents containing information that she relied upon in order to render care to Arturo Antezana-Castro;

3. A copy of her current *curriculum vitae* and/or resume, including but not limited to, a listing of all education and employment experience;
4. Any journal article or medical treatise which she relied upon in the provision of care to Arturo Antezana-Castro; and
5. A copy of her professional insurance policies, including umbrella, covering claims in this lawsuit.

ARTURO ANTEZANA-CASTRO

By Counsel

  
Michele Bartoli Cain (VSB #69763)

James C. Frogale (VSB #79600)

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*Attorneys for Plaintiff*

#### CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 23<sup>rd</sup> day of February, 2017, I served the foregoing via electronic mail and U.S. mail, postage pre-paid, to the following counsel of record:

Michael E. Olszewski, Esquire  
Benjamin M. Wengerd, Esquire  
Hancock, Daniel, Johnson & Nagle, PC  
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*Counsel for Defendants Quyen Dao, DDS and Quyen Dao, DDS, PLLC*

  
Counsel