Zachary T. Tyson (SBN 211185)

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Attorney for

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

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| >,  Plaintiff,  v.  >,  Defendant. | Case No.  Hon.>  Dept.>  OBJECTIONS TO > NOTICE OF DEPOSITION > DOC PRODUCTION |

Plaintiff, > (“> ”) submits the following objections to > Notice of >deponent’s Deposition pursuant to California Code of Civil Procedure (“C.C.P.”) § 2025.410:

OBJECTIONS

Defendant’s Notice of Deposition of > was scheduled, noticed and served without first determining the availability of > or counsel.

Defendant’s Notice of Deposition of > violates C.C.P. § 2025.270, in that the oral deposition was not noticed at least 10 days after service.

Defendant’s Notice of Deposition violates C.C.P. § 2025.250(a) as it seeks to take the deposition of > at a location that is not within 75 miles of the deponent’s residence or within the county where the action is pending.

Plaintiff served a deposition notice for \_\_\_\_\_\_\_. Defendant objected to and cancelled the deposition but did not provide new dates of availability for its witnesses.

Defendant’s Notice of Deposition violates C.C.P. § 2025.220(4) as > has not described with reasonable particularity the materials or category of materials to be produced by the deponent.

Plaintiff will not be appearing for deposition. Defense counsel is invited to meet and confer on the matters raised in this Objections to Notice of Deposition.

LAW OFFICES OF ARTHUR R. BOTHAM;

LAW OFFICE OF ZACHARY T. TYSON

Dated: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Arthur R. Botham

Zachary T. Tyson

Attorneys for >