

IN THE CIRCUIT COURT OF COUNTY, MISSISSIPPI

PLAINTIFFS

V. CIVIL ACTION NO.

DEFENDANTS

NOTICE TO TAKE 30(b)(6) DEPOSITION UPON ORAL EXAMINATION PURSUANT TO DEPOSITION SUBPOENA DUCES TECUM

TO:

PLEASE TAKE NOTICE that the pursuant to Miss.R.Civ.P. 30(b)(6), the defendants, and will take the deposition by stenographic means or may also video record said deposition on oral examination of the officer, official, or employee of at A.M./P.M. on , , in the law offices of . Pursuant to Miss.R.Civ.P. 30(b) (6), the officer, official, or employee of shall designate a spokesman with knowledge and custody of the matters and documents contained in the attached deposition subpoena duces tecum.

PLEASE FURTHER NOTICE that, pursuant to Rule 30(b) (1) of the Mississippi Rules of Civil Procedure, a Deposition Subpoena will be served upon the deponent to be examined and will request production of the following materials:

Deponent shall have knowledge of the following:

1. The name, address and telephone number of all persons associated with as employee, agent, independent contractor or otherwise for the purpose of real estate sales during .
2. The name, address and telephone number of all persons associated with as employee, agent, independent contractor or otherwise for the purpose of real estate sales during .
3. For each person identified in response to 1 and 2 above:
 - a. Identify those who took the course with plaintiff in ;
 - b. The initial date of affiliation of each with
 - c. The prior sales experience of each;
 - d. The date, total amount and agent commission of each real estate sale in and by each;

- e. The hours (weekly or monthly) worked on real estate sales by each in and (including open houses and caravans).

Deponent(s) shall bring with him/her/them the following:

1. All records evidencing hours worked by on real estate sales in and .
2. All records evidencing commissions earned from real estate sales in .
3. All records evidencing hours worked on real estate sales by each person affiliated with in and .
4. All records evidencing commissions earned from real estate sales by each person affiliated with in and . You are invited to attend said deposition to examine the deponent, as you deem fit and proper in conformity with the Mississippi Rules of Civil Procedure.

Said deposition will continue from day to day until concluded.

Respectfully submitted this the day of , 2 .

By: _____

Attorney for

SUBMITTED BY:

Telephone:
MSB #
ATTORNEYS FOR

CERTIFICATE OF SERVICE

I, , do hereby certify that I have this day mailed, by United States mail, postage prepaid, a true and correct copy of the above and foregoing **NOTICE TO TAKE 30(b)(6) DEPOSITION UPON ORAL EXAMINATION PURSUANT TO DEPOSITION SUBPOENA DUCES TECUM** to:

DATED, this the day of , 20 .
