

The deposition will be by oral examination before a notary public or duly authorized officer and will be recorded by sound, video, and stenographic means.

Pursuant to Fed. R. Civ. P. 30(b)(2) and 34, the deponent is requested to bring to the deposition the documents described in the attached **Exhibit A**.

Dated: February 4, 2015

Respectfully Submitted,

The DeWood Law Firm
Attorney for Plaintiff

By: 

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CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of February 2015, I caused the foregoing **NOTICE OF VIDEO TAPED DEPOSITION** to be served upon the following via e-mail and hand delivery.

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EXHIBIT A

- 1. All documents relating to Plessen Enterprises, Inc. (“Plessen”) received from Bryant, Barnes and Moss, LLP, on February 26, 2003 pursuant to a written acknowledgement of receipt, or any time thereafter.**
- 2. All documents relating to or evidencing any authorization by the directors, officers or shareholders of Plessen for the issuance of a check dated March 27, 2013 in the amount of \$460,000 drawn on Plessen’s account and payable to Waleed Hamed (the “Check”).**
- 3. All documents relating to or evidencing the withdrawal, deposit, and disbursement of the proceeds of the Check.**
- 4. All documents relating to or evidencing the wiring of the proceeds of the Check to Attorney Gerry Groner and any other person or entity receiving any portion of the proceeds of the Check.**
- 5. All documents relating to or evidencing the source of funds for the \$230,000 deposited with the Clerk of the Court after the Complaint was filed in this matter.**
- 6. All documents relating to or evidencing any withdrawal of funds from Plessen’s bank accounts prior to March 27, 2013 for the personal use of Plessen’s directors, officers or shareholders.**
- 7. All documents relating to or evidencing the adoption of any By-Laws of Plessen, including any notices of meetings, minutes of meetings or resolutions.**
- 8. All documents relating to or evidencing all meetings of directors, incorporators or shareholders of Plessen from the date of its incorporation to date.**
- 9. All documents relating to or evidencing the composition of Plessen’s Board of Directors from the date of its incorporation to date.**
- 10. Copies of the 2011, 2012, and 2013, and 2014 Renewal Business License Application.**
- 11. Copies of the 2012, 2012, and 2013, and 2014 of Plessen’s Franchise Tax Returns.**