

# Products Liability

## 30(b)(6) Deposition Notice

IN THE CIRCUIT COURT FOR [COUNTY], [STATE]

AT [TOWN]

[PLAINTIFF],

Survivor of her husband, [PLAINTIFF], deceased.

Plaintiff, vs.

[DEVICE CORP].

d/b/a [PRODUCT], a [STATE] corporation,

Defendants.

Docket No. [XXXX]

### **Plaintiff's Notice of Deposition**

Please take notice that pursuant to Rule 30.02(6) of the [STATE] Rules of Civil Procedure, the deposition of [DEVICE CORP] (hereinafter referred to as "DC") will be taken upon oral examination before a Notary Public or other officer authorized by law to take depositions and will be recorded by videotape pursuant to Rule 30.02(4) of the Tennessee Rules of Civil Procedure at [ADDRESS] on [DATE] at [TIME], and shall continue from day to day thereafter until completed.

Pursuant to Rule 30.02(6) of the [STATE] Rules of Civil Procedure, DC is required to designate and fully prepare one or more officers, directors, managing agents, or other persons

with the most knowledge concerning the following designated matters and as to such information that is known or reasonably available to the organization about the following:

- (1) The person(s) most knowledgeable about the decision to use a nylon lanyard on the DC [PRODUCT] Personal Activator, including who was involved in the decision, when it was made, the costs per unit for the lanyard that was chosen, and what alternatives were considered.
- (2) The person(s) most knowledgeable about principles of safe product design.
- (3) The person(s) most knowledgeable about incidents, injuries, or deaths that have occurred due to the unbreakable nature of the lanyard used on the [DC] [PRODUCT] Personal Activator.
- (4) The person most knowledgeable about the number of customers under contract with DC, fees for the monitoring service, fees for the DC [PRODUCT] Personal Activator, expenses related to the operation of the call center, and actual cost of the NMWC [PRODUCT] Personal Activator in comparison to the sales price of the product.

It is the intention of plaintiff to use the videotape of these depositions at trial.

Respectfully submitted,

[PLAINTIFF'S ATTORNEY]

[ADDRESS]

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was mailed to the following person:

[NAME]

[ADDRESS]

On this [DATE].

[PLAINTIFF'S ATTORNEY]