

# Trucking

## 30(b)(6) Deposition Notice

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

[PLAINTIFF'S NAME], Survivor of her husband, [DECEASED'S NAME], deceased. Plaintiff,

vs. [DEFENDANT COMPANY] a [STATE] corporation, Defendant.

Docket No. [nn-nnnn]

### **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 [DEFENDANT NAME] Corporation (hereinafter referred to as “[Shortened Name]”) 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 [STATE] Rules of Civil Procedure at [ADDRESS] on [DATE], at [TIME], [ZONE] and shall continue from day to day thereafter until completed.

Pursuant to Rule 30.02(6) of the [STATE] Rules of Civil Procedure, [DEFENDANT COMPANY] 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:

The person(s) most knowledgeable about the hiring and screening of drivers.

The person(s) most knowledgeable about on the road safety, accident prevention, and accident reporting.

The person(s) most knowledgeable about driver supervision.

The person(s) most knowledgeable about the review and/or inspection of driver logs.

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

Respectfully submitted,

[PLAINTIFF'S ATTORNEY]

[STREET ADDRESS]

Attorneys for Plaintiff

### **CERTIFICATE OF SERVICE**

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

[DEFENDANT'S COUNSEL]

[STREET ADDRESS]

On this [DATE] day of [MONTH], [YEAR].

[PLAINTIFF'S ATTORNEY]