



Notice of Deposition Pursuant to Fed. R. Civ. P. 30(b)(6)

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 30(b)(6) and 45 and LR 30.1, [Plaintiff / Defendant] will take the deposition(s) upon oral examination, to be recorded by stenographic means and videotape, at the offices of [Deposition Location]. The deposition(s) will commence at [Date & Time]. If necessary, each deposition will be adjourned until completed.

[Plaintiff / Defendant] is requested to designate one or more 30(b)(6) witnesses who is(are) knowledgeable and prepared to testify fully on behalf of [Plaintiff / Defendant] regarding the following topics:

1. Inventory of computer systems and other technology assets currently or previously in operation, including:
 - a. Number of computer systems and other technology assets;
 - b. Category of computer systems and other technology assets, such as servers, workstations, laptops, etc.;
 - c. Locations of computer systems and other technology assets;
 - d. Operating system of computer systems and other technology assets;
 - e. Applications residing on computer systems and other technology assets;
2. Corporate policies and procedures for labeling, storing, and archiving electronic information relevant to the legal matter, including:
 - a. Physical location of electronic information;
 - b. Inventory of backup media and archived information;
 - c. Log of backup media and archived information;
 - d. Schedule of when backup media and archived information was created;
 - e. Portable media labeling techniques, including CD-ROMs, diskettes, external hard drives, tapes, etc.;
3. Corporate policies and procedures for managing electronic information relevant to the legal matter, including:
 - a. User permissions for accessing, modifying, and deleting data;
 - b. Utilization of data deletion programs;
 - c. Schedule for formatting hard drives or reinstalling software applications;
4. Corporate policies and procedures for employee use of computers, electronic information, and technology platforms;
5. Listing of current and former employees that have or had direct access to network resources, technology assets, and relevant information during the associated times in questions.

Respectfully Submitted
COUNSEL FOR [Plaintiff / Defendant]