

[Home](#) - [Foreclosure Defense](#) - [Pleadings Main Index](#)

Notice of Telephonic Deposition

IN THE CIRCUIT COURT OF THE
20TH JUDICIAL CIRCUIT IN AND
FOR COLLIER COUNTY, FLORIDA

DEUTSCHE BANK NATIONAL TRUST CASE NO: 07-xxxx-CA
COMPANY, AS TRUSTEE FOR MORGAN
STANLEY ABS CAPITALI, INC., TRUST
2006-HE6, MORTGAGE PASS-THROUGH
CERTIFICATES, SERIES 2006-HE6,

Plaintiff,
vs.
D.O.
et. al.,
Defendant.

_____/

DEFENDANTS', D.O.'S, NOTICE OF TELEPHONIC DEPOSITION OF THE PERSON WITH
THE MOST KNOWLEDGE DUCES TECUM*

PLEASE TAKE NOTICE that the undersigned attorney will take the deposition by oral
examination for the purposes of discovery and for use as evidence in said cause, or both, as
follows:

DEPONENT: The corporate officer(s), director(s), employee(s) or agent(s) of the Plaintiff,
DEUTSCHE BANK NATIONAL TRUST COMPANY, AS TRUSTEE FOR MORGAN STANLEY
ABS CAPITALI, INC., TRUST 2006-HE6, MORTGAGE PASS-THROUGH CERTIFICATES,
SERIES 2006-HE6, with the most knowledge concerning the following subject areas:

(1) The facts to support the Plaintiff's lost note and mortgage count.

*AND TO BRING WITH YOU the following:

All documents which support Plaintiff's lost note count, including, but not limited to, a copy of the
note and mortgage and copies of any assignments of the note.

DATE: January 26, 2012 TIME: 10:30 a.m.

Notice of Deposition Foreclosure

LOCATION: Collier Court Reporting
3447 Pine Ridge Road/Suite 102, Naples, FL
239-592-6171

Said deposition will be taken before a certified court reporter, or any other officer authorized to administer oaths by the laws of the State of Florida and a person who is neither a relative nor employee of such attorney or counsel, and who is not financially interested in the action. Said deposition to be taken pursuant to the Florida Rules of Civil Procedure in such cases provided. The said oral examination(s) will continue from hour to hour and from day to day until completed.

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED that on January 10, 2012, a true and correct copy of the foregoing was faxed and mailed to: Ryan Weeks, Esq., Albertelli Law, P.O. Box 23028, Tampa, FL 33623 [Attorneys for Plaintiff]; David E. Leigh, Esq., 5150 Tamiami Trail, North, Suite 501, Naples, FL 34103 [Attorney for Sherwood V., Inc.] and David Brian Levin, Esq., Adorno & Yoss LLP, 2525 Ponce de Leon Blvd Ste 400, Miami, Florida 33134-6044.

Attorney for Defendants
2100 E. Hallandale Beach Blvd./Suite 200
Hallandale Beach, FL 33009
Telephone: (954) 455-0800
Facsimile: (954) 455-9649

By _____
ALAN D. SACKRIN, ESQ. Florida Bar No. 349070
LARRY TOLCHINSKY, ESQ. Florida Bar No 021997

/kb

VIA FACSIMILE Collier Court Reporting c/o United Reporting [954-525-0511]

This is a sample document related to a specific set of facts and circumstances and should not be used or relied upon if any foreclosure, deficiency judgment, short sale or any other real estate matter. We recommend and urge you to consult with an experienced lawyer for professional advice as each case is unique.