

1 William A. Daniels, Esq. (SBN 172042)

2 **DANIELS LAW**

3 Mail to: 15021 Ventura Boulevard, 883

4 Sherman Oaks, CA 91403

5 Tel: 818/907-8073

6 Fax: 818/332-1284

7 Bill@DanielsLaw.com

8 Attorneys for Plaintiff,

9 #####

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **FOR THE COUNTY OF SAN DIEGO**

12 #####

13 ,

14 Plaintiff,

15 vs.

16 #####,

17 Defendants.

) Case No: #####

) **NOTICE OF TAKING DEPOSITION OF
PERSON MOST
QUALIFIED AND REQUEST FOR
PRODUCTION OF DOCUMENTS**

) Assigned To: Hon. #####
Dept : ###

) Complaint Filed on: #####

20 **TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

21
22 PLEASE TAKE NOTICE that Plaintiff ##### will take the following
23 deposition on ##### at **9:00 a.m.** at Daniels Law, located at 16133 Ventura
24 Blvd., Penthouse Suite A, Encino, CA 91436, (818) 907-8073:
25

28 **NOTICE OF TAKING DEPOSITION OF #####'S PERSON MOST QUALIFIED
AND REQUEST FOR PRODUCTION OF DOCUMENTS**

1. The #####'s Person Most Qualified to testify regarding underwriting ### Policy # #####.
2. The #####'s Person Most Qualified to testify regarding #####'s claims for insurance benefits from 2017 to the present under ### Policy # #####.

REQUEST FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE FURTHER NOTICE that pursuant to Code of Civil Procedure §2025.220(a)(4), Plaintiff requests that the deponent produce for inspection and copying at said deposition the originals of the following documents:

DEFINITIONS

1. The terms "YOU" or "YOUR" as used herein shall mean #####.
2. COMMUNICATION(S) refer to the transmittal of information, including facts, ideas, inquiries or otherwise, including oral statements, letters, memos, e-mails, texts, and notes of conversations, whether handwritten or transmitted by telephone, other personal or business devices, facsimile, computer, or any other means.

ITEMS TO BE PRODUCED:

1. The complete original underwriting file for ### Policy # #####, including all notes, diaries, electronic mails, COMMUNICATIONS of any kind, folders and notations.
2. The complete original claims file for #####'s claims for health benefits from 2017 to the present under ### Policy # #####, including all notes, diaries, electronic mails, COMMUNICATIONS of any kind, folders and notations.
3. A complete copy of YOUR claims handling manual as utilized by YOU from 2017 to the present.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

4. A complete copy of YOUR underwriting manual as utilized by YOU from 2017 to the present.

DATED: DANIELS LAW

By: _____
William A. Daniels, Esq.
Attorneys for Plaintiff
#####