

STATE OF MICHIGAN

IN THE CIRCUIT COURT FOR THE COUNTY OF WAYNE

Daniel Plouffe,  
Individually and on behalf of a class  
of similarly-situated persons,

Civil Action No. 11-007645-CL

Plaintiff,  
vs.

Hon. Daphne Means Curtis

General Motors, LLC  
a Delaware corporation,

Defendant.

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PITT McGEHEE PALMER RIVERS  
& GOLDEN, P.C.  
Michael L. Pitt P-24429  
Cary S. McGehee P-42318  
Robert W. Palmer P-31704  
Beth M. Rivers P-33614  
Attorneys for Plaintiff  
117 West Fourth St., Ste 200  
Royal Oak, Michigan 48067  
(248) 398-9800

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BARRIS SOTT DENN & DRIKER, PLLC  
Sharon M. Woods P-22542  
Daniel J. LaCombe P-38602  
Erica Fitzgerald P-66550  
Attorney for Defendant  
211 West Fort St.. 15<sup>th</sup> Floor  
Detroit, Michigan 48226  
(313) 965-9725

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**NOTICE OF TAKING DUCES TECUM DEPOSITIONS**

TO: ATTORNEY FOR DEFENDANT:

PLEASE TAKE NOTICE that, pursuant to the applicable Michigan General Court Rules, the deposition upon oral examination of the following persons will be taken at a date, time, duration and location to be agreed upon by the parties, before a Notary Public authorized by law to administer oath and take depositions:

John L. Gatt

Edward Vogt

Kim Howe

Don Johnson

Kurt McNeil

Deponents shall bring to the deposition all ORIGINAL personal notes, calendars, emails or written material of any type in the deponent's possession or under his/her control relating to any and all interactions, discussions or contact with Daniel Plouffe. This request for ORIGINAL written materials should be complied with even if copies of the materials have been previously supplied in discovery.

As attorney for defendant, you are to produce said deponents at the date, time and location indicated above.

You are invited to cross examine.

PITT McGEHEE PALMER RIVERS & GOLDEN, P.C.

BY: \_\_\_\_\_

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Attorneys for Plaintiff  
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Royal Oak, Michigan 48067  
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Dated: August 30, 2011