IN THE UNITED STATES DISTRICT COurt FOR

THE Western DISTRICT OF Texas

San Antonio Division

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| HOLCOMBe, et. al,  Plaintiffs | No. 5:18-cv-00555-XR  (consolidated cases) |
| vs. |
| UNITED STATES OF AMERICA,  Defendant |

Please take notice that Plaintiffs intend take the oral and videotaped deposition of [NAME]. Pursuant to local, statewide, and national emergency orders related to the ongoing COVID-19 pandemic, the deposition will occur virtually with all parties attending via remote deposition technology provided by Res Ipsa. Secure links will be provided via email by Res Ipsa. The deposition will be recorded stenographically and may be digitally video recorded. The court reporter and videographer are being provided through Res Ipsa, 501 Congress Avenue, Suite 150, Austin, Texas 78701, email: depos@res-ipsa.com. The court reporter that swears in the witness remotely will do a statement on the record saying that all parties agree and stipulate to the remote deposition and the remote swearing of the witness. The deposition, when so taken and returned according to law, may be used in evidence at the trial of this case.

The deposition will be held on [DATE] at [TIME] and will be conducted remotely by Res Ipsa, with the witness and all parties in their preferred respective locations.

You are invited to attend and participate as you deem appropriate. The deposition will take place from day to day until complete.

Respectfully Submitted,

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| /s/ Jamal K. Alsaffar  Jamal K. Alsaffar  JAlsaffar@nationaltriallaw.com  Texas Bar No. 24027193  Tom Jacob  TJacob@nationaltriallaw.com  Texas Bar No. 24069981  Whitehurst, Harkness, Brees, Cheng, Alsaffar & Higginbotham & Jacob PLLC  7500 Rialto Blvd, Bldg. Two, Ste 250  Austin, TX 78735  Office 512-476-4346  Fax 512-476-4400  Counsel for Vidal, McKenzie, Solis, McNulty, and Wall | /s/ Jason P. Steed  Jason P. Steed  JSteed@kilpatricktownsend.com  Texas Bar No. 24070671  Kilpatrick Townsend & Stockton LLP  2001 Ross Avenue, Suite 4400  Dallas, TX75201  Office 214-922-7112  Fax 214-853-5731  Counsel for Vidal, McNulty, and Wall |
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Certificate of Service

By our signatures above, we certify that a copy of has been sent to the following on May 5, 2020 via the Court’s CM/ECF notice system.

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| JOSEPH H. HUNT  Assistant Attorney General  United States Dept. of Justice  Civil Division | JOHN PANISZCZYN  Civil Chief  United States Attorney’s Office  Western District of Texas |
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