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4 ROBERT M. KUCZEWSKI, IN PRO PER

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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF SAN DIEGO**
9

10 **Robin Marien,**
Gabriel Jebb, and
11 Air California Adventure, Inc.,

12 Plaintiff(s),

13 vs.

14 **Robert Michael Kuczewski,**
Marjorie Mae Holland,
15 and DOES 2 through 20 inclusive,

16
17 Defendant(s).
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) Case No.: 37-2015-00015685-CU-DF-CTL

)
) **DEFENDANT'S NOTICE OF DEPOSITION**
) **OF PLAINTIFF ROBIN MARIEN**

) Date: December 13th, 2019

) Time: 1 p.m.

) Location: Suite 500, 7676 Hazard Center Drive,
San Diego, California, 92108

) Judge: Kenneth J. Medel

) Dept: C-66

) Complaint Filed: May 11, 2015

) Trial Date: January 17th, 2020
)

19 **TO PLAINTIFF AND HIS ATTORNEYS OF RECORD;**
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21 **PLEASE TAKE NOTICE** that Defendant/Cross-Complainant, Robert Michael Kuczewski will
22 take the deposition of Plaintiff/Cross-Defendant ROBIN MARIEN on December 13, 2019 at the
23 offices of Barrister Executive Suites, Suite 500, 7676 Hazard Center Drive, San Diego, California,
24 92108, before a Notary Public of the State of California or other person authorized to administer
25 oaths as set forth in Code of Civil Procedure §2093(2).
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27 **NOTICE IS ALSO GIVEN** that the above deposition will or may be videotaped pursuant to Code
28 of Civil Procedure §2025.220(a)(5).

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NOTICE IS ALSO GIVEN that said Plaintiff shall require pursuant to Code of Civil Procedure §2025.280(a) production of the documents listed in Exhibit A.

If an interpreter is required to translate testimony, notice of same must be given at least (5) days before the deposition date, including the special language and/or dialect needed. In addition, if for any reason the taking of said deposition is not completed on said date, the taking of said deposition will be continued from day to day, excluding Sundays and holidays, until completed.

If an interpreter is required to translate testimony, notice of same must be given at least (5) days before the deposition date, including the special language and/or dialect needed. In addition, if for any reason the taking of said deposition is not completed on said date, the taking of said deposition will be continued from day to day, excluding Sundays and holidays, until completed.

Dated November 27th, 2019

Robert M. Kuczewski
Self Represented

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EXHIBIT A
DEFINITIONS

The words used in these requests are to be interpreted according to their plain meanings.

REQUESTS

REQUEST FOR PRODUCTION NO. 1:

Any and all “writings” as that term is defined in the Evidence Code §250, that reference or RELATE in any way to Defendant Kuczewski from January 1st, 2004 through the present.

REQUEST FOR PRODUCTION NO. 2:

Any and all audio and video recordings that reference or RELATE in any way to Defendant Kuczewski or Plaintiff's interactions with Defendant Kuczewski from January 1st, 2004 through the present.

REQUEST FOR PRODUCTION NO. 3:

The video taken by Plaintiff's employee(s) as shown in attached Exhibit 1 in 2013.

REQUEST FOR PRODUCTION NO. 4:

The video taken by Plaintiff's employee(s) as shown in attached Exhibit 2 in 2013.

REQUEST FOR PRODUCTION NO. 5:

The video taken by Plaintiff's employee(s) as shown in attached Exhibit 3 in 2013.

REQUEST FOR PRODUCTION NO. 6:

The video taken by Plaintiff's employee(s) as shown in attached Exhibit 4 on March 8th, 2015.

1 **REQUEST FOR PRODUCTION NO. 7:**

2 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 5 on June 14th, 2015.

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4 **REQUEST FOR PRODUCTION NO. 8:**

5 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 6 on June 14th, 2015.

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7 **REQUEST FOR PRODUCTION NO. 9:**

8 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 7 on June 14th, 2015.

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10 **REQUEST FOR PRODUCTION NO. 10:**

11 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 8 on July 12th, 2015.

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13 **REQUEST FOR PRODUCTION NO. 11:**

14 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 9 on July 12th, 2015.

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16 **REQUEST FOR PRODUCTION NO. 12:**

17 The video taken by Plaintiff's employee(s) as shown in attached Exhibit 10 on July 12th, 2015.

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19 **REQUEST FOR PRODUCTION NO. 13:**

20 Names and addresses of any and all employees shown in Exhibits 1 through 10 and who were
21 present at the Gliderport on the dates of November 9th, 2014, March 8th, 2015, June 14th, 2015, and
22 July 12th, 2015.

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24 **REQUEST FOR PRODUCTION NO. 14:**

25 Any and all documents that relate to communications between Plaintiffs or Plaintiff's employees
26 and the United States Hang Gliding and Paragliding Association (USHPA) regarding Defendant
27 Kuczewski.

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1 **REQUEST FOR PRODUCTION NO. 15:**

2 Any and all documents that relate to communications between Plaintiffs or Plaintiff's employees
3 and the United States Hang Gliding and Paragliding Association (USHPA) regarding the Torrey
4 Hawks Hang Gliding Club.

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6 **REQUEST FOR PRODUCTION NO. 15:**

7 Any and all documents that relate to communications between Plaintiffs or Plaintiff's employees
8 and the United States Hang Gliding and Paragliding Association (USHPA) regarding the US Hawks
9 Hang Gliding Association.

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11 **REQUEST FOR PRODUCTION NO. 16:**

12 Any and all electronic data (whether stored on electronic media or network) including E-mails, text
13 messages, SMS, iMessage, or other similar data transfer protocol., which relate or refer to or
14 concern any of the parties of this case.

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16 **REQUEST FOR PRODUCTION NO. 17:**

17 Gross income paid to Plaintiffs or Plaintiff's business (Air California Adventure) from any and all
18 sources in any way related to the operation of the Torrey Pines Gliderport in the years 2010, 2011,
19 2012, 2013, 2014, 2015, 2016, 2017, 2018, and 2019.

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21 **REQUEST FOR PRODUCTION NO. 18:**

22 Names and addresses of any and all people who have been injured (fatally or otherwise) from any
23 cause at the Torrey Pines Gliderport in the years 2010, 2011, 2012, 2013, 2014, 2015, 2016, 2017,
24 2018, and 2019.

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