

STEVEN R. ANDREWS, *Pro se*
822 Monroe Street
Tallahassee, FL 32303
Tel: (850) 681-6416 * Fax: (850) 681-6984
STEVEN R. ANDREWS
sandrews@andrewslawoffice.com
service@andrewslawoffice.com
As a Pro Se Respondent

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

CASE NO. 114CV271495

SARAH HANSFORD, an individual,
BRAD PEIPENBINK, an individual
And RICK SCOTT, an individual.

Petitioners,

v.

**RESPONDENT'S NOTICE OF
TAKING VIDEO-TAPE DEPOSITION
OF RICK SCOTT, an individual**

STEVEN R. ANDREWS, a *pro se*
individual,

Respondent

_____ /

In re out-of-state action:

*Steven R. Andrews v. The Executive Office
of the Governor, State of Florida*, Case No.
2013-CA-3280 (In the Circuit Court of the
Second Judicial Circuit, in and for Leon
County, Florida)

Filed by Steven R. Andrews, Plaintiff in the
out-of-state action

**DATE: OCTOBER 13, 2014
DEPT: 19**

NOTICE OF TAKING VIDEO-TAPED DEPOSITION OF RICK SCOTT, an individual

TO: HARTOG & BAER, P.A.
John A. Hartog, SBN: 88598
Daniel J. Leahy, SBN: 260540
4 Orinda Way, Suite 250-B
Orinda, CA 94563
Phone: (925) 253-1717
Fax No (925) 253-0334
Email: jahartog@hartogbaer.com
*Attorneys for Petitioners, Sarah
Hansford, Brad Piepenbrink and
Rick Scott*

GOOGLE, INC. (Records Custodian)
c/o CSC 2710 Gateway Oaks St. #150N
Sacramento, CA 95833
google-legal-support@google.com

PLEASE TAKE NOTICE that Respondent, **STEVEN R. ANDREWS**, *as Pro Se Respondent* and pursuant to Sections 2025.210, 2025.220, 2025.250, 2025.330 and 2025.620, of the California Code of Civil Procedure that the undersigned *Pro Se Respondent* will take the deposition of the following Party Petitioner:

Deponent: **Rick Scott, an individual who resides in Tallahassee, Florida within 75 miles of 3500 Financial Plaza, Suite 350, Tallahassee, FL 32312**

Time: **10:00 a.m. E.S.T. (for not more than seven (7) hours) as provided for by the California Code of Civil Procedures**

Date: **Monday, October 24, 2014**

Location: **3500 Financial Plaza, Suite 350, Tallahassee, FL 32312**

Videographer: **The Pro Se Respondent shall cause the deposition to be recorded by video technology provided by Premier Reporting, 114 W. Fifth Avenue, Tallahassee, FL 32303**

The oral examinations will commence at the above stated time or upon completion of any other deposition scheduled in this case for the same date(s), and will continue from day to day until completed provided however that the deposition shall not exceed seven (7) hours. This deposition are being taken for the purpose of discovery, for use at hearing or for such other purposes as are authorized or permitted under the applicable law and Rules of the California Code of Civil Procedure. In compliance with the Americans with Disabilities Act of 1990, you are hereby notified that if you require special accommodations due to a disability, contact Pro Se Respondent, no later than seven (7) days prior to the date your appearance is required pursuant to this notice to insure that reasonable accommodations are available.

PLEASE GOVERN YOURSELVES ACCORDINGLY.

Respectfully submitted,

STEVEN R. ANDREWS
822 North Monroe Street
Tallahassee, Florida 32303
(850) 681-6416 FAX: 681-6984

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sandr@andrewslawoffice.com
service@andrewslawoffice.com

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Tallahassee, FL 32303
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As a Pro Se Respondent

**IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SANTA CLARA**

CASE NO. 114CV271495

SARAH HANSFORD, an individual,
BRAD PEIPENBINK, an individual
And RICK SCOTT, an individual.

Petitioners,

v.

**PROOF OF SERVICE
BY RESPONDENT STEVEN R. ANDREWS,
AS PRO SE PARTY**

STEVEN R. ANDREWS, a *pro see*
individual,

Respondent

_____ /

In re out-of-state action:

*Steven R. Andrews v. The Executive Office
of the Governor, State of Florida*, Case No.
2013-CA-3280 (In the Circuit Court of the
Second Judicial Circuit, in and for Leon
County, Florida)

Filed by Steven R. Andrews, Plaintiff in the
out-of-state action

**DATE: October 13, 2014
DEPT: 19**

PROOF OF SERVICE

I, Marilyn M. Alpern, certify and declare as follows: I am employed in the County of Leon, State of Florida. I am over the age of eighteen (18) years and not a party to this action. My

employment address is 822 North Monroe Street, Tallahassee, FL 32303. On October 13, 2014 I caused to be served the foregoing documents described as:

- **NOTICE OF APPEARANCE FOR PRO SE RESPONDENT, STEVEN R. ANDREWS;**
- **NOTICE OF TAKING VIDEOTAPE DEPOSITION OF RICK SCOTT;**
- **NOTICE OF TAKING VIDEOTAPE DEPOSITION OF SARA HANSFORD;**
- **NOTICE OF TAKING VIDEOTAPE DEPOSITION OF BRAD PEIPENBINK;**
- **PRO SE RESPONDENT'S NOTICE TO REQUIRE PARTY ATTENDANCE AT EVIDENTIARY HEARING SET FOR NOVEMBER 7, 2014 AT 9:00 AM**

by delivering a true copy thereof to the interested parties as follows:

HARTOG & BAER, P.A.
John A. Hartog, SBN: 88598
Daniel J. Leahy, SBN: 260540
4 Orinda Way, Suite 250-B
Orinda, CA 94563
Phone: (925) 253-1717
Fax No (925) 253-0334
Email: jahartog@hartogbaer.com
*Attorneys for Petitioners, Sarah
Hansford, Brad Piepenbrink and
Rick Scott*

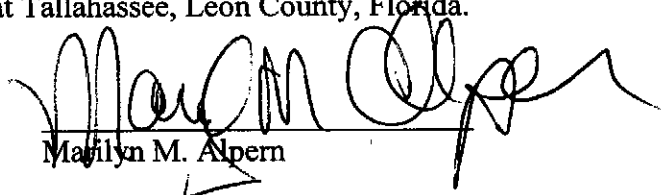
GOOGLE, INC. (Records Custodian)
c/o CSC 2710 Gateway Oaks St. #150N
Sacramento, CA 95833
google-legal-support@google.com

in the manner as follows:

X BY MAIL: By enclosing a true copy thereof in an envelope addressed to each person listed above before sealing the name and placing the sealed envelope for collection and mailing on the date and at the place shown following the ordinary business practices of my employer, The Law Offices of Steven R. Andrews, P.A. I am readily familiar with the business practices of The Law Offices of Steven R. Andrews, P.A. for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage prepaid; and,

X BY ELECTRONIC TRANSMISSION (Courtesy): By electronically mailing a true copy thereof to each of the electronic addressees above. No error in transmission was reported.

I declare under penalty of perjury under the laws of the State of Florida that the above is true and correct. Executed on October 13, 2014 at Tallahassee, Leon County, Florida.


Marilyn M. Alpern