

RECEIVED
NOV 18 1991
Director of
Environmental Health

1 Mark Oium, Esq.
2 O'CONNOR, COHN, DILLON & BARR
3 A Law Corporation
4 151 Union Street at Sansome
Icehouse One, Suite 551
San Francisco, California 94111
Telephone: (415) 781-9210

5 Attorney for Defendants
6 KATHLEEN LOUIE, Individually, and
d/b/a HIGHLANDER LAUNDRY & DRY CLEANERS

7 UNITED STATES DISTRICT COURT
8 NORTHERN DISTRICT OF CALIFORNIA

| | | | |
|----|--------------------------------|---|-----------------------------|
| 10 | HARSCH INVESTMENT CORPORATION, |) | Case No. C 91 1403 SBA |
| | |) | |
| 11 | Plaintiff, |) | <u>NOTICE OF DEPOSITION</u> |
| | |) | |
| 12 | vs. |) | Date: 11/22/91 |
| | |) | Time: 10:00 a.m. |
| 13 | KATHLEEN LOUIE AND NON LOUIE, |) | Place: 80 Swan Way, #200 |
| | individuals, dba HIGHLANDER |) | Oakland, CA |
| 14 | LAUNDRY AND DRY CLEANERS, |) | |
| | |) | |
| 15 | Defendants. |) | |

16 TO EACH PARTY AND TO EACH ATTORNEY OF RECORD IN THIS ACTION:

17 YOU ARE HEREBY NOTIFIED that the deposition of Alameda County
18 Department of Environmental Health will be taken at the offices of
19 Alameda County Department of Environmental Health, located at 80
20 Swan Way, Suite 200, Oakland, California 94621, commencing at
21 10:00 a.m. on November 22, 1991, and continuing from day to day
22 thereafter.

23 YOU ARE FURTHER NOTIFIED that the deponent is not a party to
24 this action. So far as known to the deposing party, the deponent's
25 address and telephone number are as follows: 80 Swan Way, Suite 200,
26 Oakland, California 94621. (510) 271-4320. A copy of this

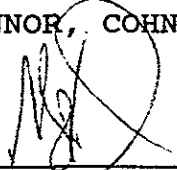
1 deposition subpoena is attached hereto and served herewith.

2 YOU ARE FURTHER NOTIFIED that the deponent is not a natural
3 person. Further, the deponent is required to produce the following
4 documents, records, or other materials at said deposition; all
5 papers, documents, exhibits, reports, figures, descriptions, and
6 announcements pertaining to the property located within a one-half
7 mile radius of the intersection of Shoreline Drive and Park Street
8 of Alameda, California.

9 A list of all parties or attorneys for parties on whom this
10 notice of deposition is being served is shown on the accompanying
11 proof of service.

12
13 Dated: October 17, 1991

O'CONNOR, COHN, DILLON & BARR

14
15 
16 _____
Mark Oium, Esq.
Attorney for Defendant
KATHLEEN LOUIE

DEPOSITION SUBPOENA

AO 90 (Rev. 5/85) Deposition Subpoena

United States District Court

NORTHERN

DISTRICT OF CALIFORNIA

Harsch Investment Corp.,
Plaintiffs,

DEPOSITION SUBPOENA

v.
Kathleen Louie and Non Louie,
individuals, dba Highlander Laun- CASE NUMBER:
dry & Dry Cleaners
Defendants.

TYPE OF CASE

CIVIL CRIMINAL

SUBPOENA FOR

PERSON DOCUMENT(S) or OBJECT(S)

TO: Alameda County Department of Environmental Health, A.K.A. Alameda
County Health Agency, Hazardous Materials Division.

YOU ARE HEREBY COMMANDED to appear at the place, date, and time specified below to testify at the taking of a
deposition in the above case.

PLACE

DATE AND TIME

The office of the Alameda County Depart-
ment of Environmental Health
80 Swan Way, #200
Oakland, California 94621

10:00 a.m.,
November 22, 1991.

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):* All papers,
documents, exhibits, reports, figures, descriptions, and announcements
pertaining to the property located within a one half mile radius of
the intersecting streets of Shore Line Drive and Park Street in
the City of Alameda, California.

Please see additional information on reverse

Any subpoenaed organization not a party to this suit is hereby admonished pursuant to Rule 30(b)(6), Federal Rules of Civil Proce-
dure, to file a designation with the court specifying one or more officers, directors, or managing agents, or other persons who con-
sent to testify on its behalf, and setting forth, for each person designated, the matters on which he will testify or produce docu-
ments or things. The persons so designated shall testify as to matters known or reasonably available to the organization.

U.S. MAGISTRATE OR CLERK OF COURT

DATE

BY DEPUTY CLERK

This subpoena is issued upon application of the:

Plaintiff Defendant U.S. Attorney

QUESTIONS MAY BE ADDRESSED TO:

Mark Oium, Esq.,
O'Connon, Cohn, Dillon & Barr
A Law Corporation
151 Union St., San Francisco, CA
ATTORNEY'S NAME, ADDRESS AND PHONE NUMBER

94111

(415) 781 - 9210

1 CERTIFICATE OF SERVICE BY MAIL

2 IN RE: HARSCH INVESTMENT CORP. v. LOUIE, ET AL.
3 Case No.: C 91 1403 SBA

4 I, the undersigned, declare,


5 I am a citizen of the United States and a resident of the
6 County of San Francisco. I am over the age of eighteen years and
7 not a party to the within entitled action. My business address is
8 151 Union Street, Icehouse One, Fifth Floor, San Francisco,
9 California 94111.

10 On October 17, 1991, I served the following documents, to wit,
11 **DEFENDANT'S NOTICE OF TAKING DEPOSITION OF ALAMEDA COUNTY DEPARTMENT**
12 **OF ENVIRONMENTAL HEALTH AND UNISSUED COPY OF DEPOSITION SUBPOENA;** by
13 placing a true and correct copy thereof enclosed in a sealed
14 envelope with postage thereon fully prepaid, in the United States
15 Mail at San Francisco, California, addressed as follows:

16 Richard D. Warren, Esq.
17 LANDELS, RIPLEY & DIAMOND
18 Hills Plaza
350 Steuart Street
San Francisco, CA 94105-1250

Alameda County Department of
Environmental Health
80 Swan Way, Suite 200
Oakland, CA 94621

19
20
21
22
23 I declare under penalty of perjury and the laws of the State
24 of California that the foregoing is true and correct. Executed at
25 San Francisco, California, on October 17, 1991.

26 
Michelle Doon

O'CONNOR, COHN, DILLON & BARR

A LAW CORPORATION

151 UNION STREET AT SANSOME

ICEHOUSE I, FIFTH FLOOR

SAN FRANCISCO, CALIFORNIA 94111

TELEPHONE
(415) 781-9210

TELECOPIER
(415) 397-0166

October 21, 1991

* MEMBER OF CALIFORNIA
AND NEW YORK BAR
FEDERAL I. D. #94-2696693

JAMES L. DILLON
* DUNCAN BARR
JANET L. GROVE
MARK OIUM
JERALD W. F. JAMISON
LISA T. UNGERER
JOEL C. LAMP
MICHAEL J. FITZSIMONS
THOMAS G. MANNING
SUSAN J. REIFEL
DEBORAH L. PANTER
MARIROSE PICIUCCO
KEITH REYEN
JOANN M. ARKFELD

Alameda County Department of
Environmental Health
Hazardous Materials Division
80 Swan Way, Suite 200
Oakland, CA 94621

Re: Harsch Investment Corp. v. Louie, et al.
U.S.D.C. Case No.: C 91 1403 SBA

To Whom It May Concern:

Please take notice of the deposition subpoena enclosed herewith. Further, please find enclosed a payment of \$40.00 which constitutes the statutory witness fee for the first day of deposition.

Should you have any questions regarding this matter, please do not hesitate to contact me.

Very truly yours,

O'CONNOR, COHN, DILLON & BARR


Mark Oium

EF/md

Enclosure

DEPOSITION SUBPOENA

AO 90 (Rev. 5/85) Deposition Subpoena •

United States District Court

NORTHERN

DISTRICT OF CALIFORNIA

Harsch Investment Corp.,
Plaintiffs,

DEPOSITION SUBPOENA

v.
Kathleen Louie and Non Louie,
individuals, dba Highlander Laun- CASE NUMBER: c 91 1403 SBA
dry & Dry Cleaners
Defendants.

TYPE OF CASE

CIVIL CRIMINAL

SUBPOENA FOR

PERSON DOCUMENT(S) or OBJECT(S)

TO: Alameda County Department of Environmental Health, A.K.A. Alameda
County Health Agency, Hazardous Materials Division.

YOU ARE HEREBY COMMANDED to appear at the place, date, and time specified below to testify at the taking of a
deposition in the above case.

| PLACE | DATE AND TIME |
|---|-----------------------------------|
| The office of the Alameda County Department of Environmental Health 80 Swan Way, #200 Oakland, California 94621 | 10:00 a.m., November 22, 1991. |

YOU ARE ALSO COMMANDED to bring with you the following document(s) or object(s):* All papers, documents, exhibits, reports, figures, descriptions, and announcements pertaining to the property located within a one half mile radius of the intersecting streets of Shore Line Drive and Park Street in the City of Alameda, California.

Please see additional information on reverse

Any subpoenaed organization not a party to this suit is hereby admonished pursuant to Rule 30(b)(6), Federal Rules of Civil Procedure, to file a designation with the court specifying one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and setting forth, for each person designated, the matters on which he will testify or product documents or things. The persons so designated shall testify as to matters known or reasonably available to the organization.

U.S. MAGISTRATE OR CLERK OF COURT

RICHARD W. WIEKING

(BY) DEPUTY CLERK



DATE

OCT 18 1991

This subpoena is issued upon application of the:

Plaintiff Defendant U.S. Attorney

QUESTIONS MAY BE ADDRESSED TO:

Mark Oium Esq.,
O'Connor, Cohn, Dillon & Barr
A Law Corporation
151 Union St., San Francisco, CA
ATTORNEY'S NAME ADDRESS AND PHONE NUMBER

94111

*If not applicable enter none

(415) 781 - 9210

| RETURN OF SERVICE (1) | | |
|--|----------|--|
| RECEIVED BY SERVER | DATE | PLACE |
| SERVED | DATE | PLACE |
| SERVED ON (NAME) | | FEES TENDERED <input type="checkbox"/> YES <input type="checkbox"/> NO AMOUNT \$ _____ |
| SERVED BY | | TITLE |
| STATEMENT OF SERVICE FEES | | |
| TRAVEL | SERVICES | TOTAL |
| DECLARATION OF SERVER (2) | | |
| I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct. | | |
| Executed on _____ <div style="display: flex; justify-content: space-around;"> <i>Date</i> <i>Signature of Server</i> </div> <div style="text-align: center;"> <i>Address of Server</i> </div> | | |
| ADDITIONAL INFORMATION | | |

As to who may serve a subpoena and the manner of its service see Rule 17(d), Federal Rules of Criminal Procedure, or Rule 45(c), Federal Rules of Civil Procedure.
 Fees and mileage need not be tendered to the deponent upon service of a subpoena issued on behalf of the United States or an officer or agency thereof (Rule 45(c), Federal Rules of Civil Procedure; Rule 17(d), Federal Rules of Criminal Procedure) or on behalf of certain indigent parties and criminal defendants who are unable to pay such costs (28 USC 1825, Rule 17(b) Federal Rules of Criminal Procedure)

1 CERTIFICATE OF SERVICE BY MAIL

2 IN RE: HARSCH INVESTMENT CORP. v. LOUIE, ET AL.
3 Case No.: C 91 1403 SBA

4 I, the undersigned, declare,

5 I am a citizen of the United States and a resident of the
6 County of San Francisco. I am over the age of eighteen years and
7 not a party to the within entitled action. My business address is
8 151 Union Street, Icehouse One, Fifth Floor, San Francisco,
9 California 94111.

10 On October 21, 1991, I served the following documents, to wit,
11 **DEFENDANT'S ISSUED COPY OF DEPOSITION SUBPOENA TO THE ALAMEDA COUNTY**
12 **DEPARTMENT OF ENVIRONMENTAL HEALTH;** by placing a true and correct
13 copy thereof enclosed in a sealed envelope with postage thereon
14 fully prepaid, in the United States Mail at San Francisco,
15 California, addressed as follows:

16 Richard D. Warren, Esq.
17 LANDELS, RIPLEY & DIAMOND
18 Hills Plaza
350 Steuart Street
San Francisco, CA 94105-1250

Alameda County Department of
Environmental Health
80 Swan Way, Suite 200
Oakland, CA 94621

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22 I declare under penalty of perjury and the laws of the State
23 of California that the foregoing is true and correct. Executed at
24 San Francisco, California, on October 21, 1991.

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Michelle Doon