

SUBP-020

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Xavier A.M. Lavoipierre (State Bar # 132798) LAW OFFICE OF XAVIER A.M. LAVOPIERRE 809 Broadway, Ste. 5 Sonoma, CA 95476 TELEPHONE NO.: (707) 938-1611 FAX NO. (Optional): (707) 938-4223 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): ANDY SABERI, PLAINTIFF	FOR COURT USE ONLY CASE NUMBER: 821274-8
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ALAMEDA STREET ADDRESS: 1225 Fallon Street MAILING ADDRESS: CITY AND ZIP CODE: Oakland 94612 BRANCH NAME: Rene C. Davidson	
PETITIONER: ANDY SABERI RESPONDENT: SHELL OIL., INC., PAWAN K. GARG, SOM D. GUPTA, ET.AL.	
DEPOSITION SUBPOENA FOR PERSONAL APPEARANCE AND PRODUCTION OF DOCUMENTS AND THINGS	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Donna Drogos, Alameda County Environmental Health, 1131 Harbor Bay Parkway, Alameda, Ca 94502-6577

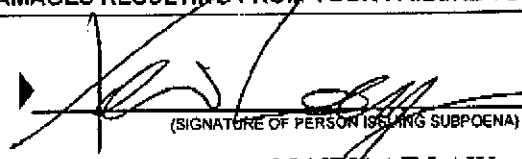
1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following date, time, and place:
 Date: August 23, 2007 Time: 9:30 a.m. Address: Aien and Welch, One Kaiser Plaza, Ste. 505, Oakland, CA

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 4. (Code Civ. Proc., § 2025.220(a)(6)).
 - b. You are ordered to produce the documents and things described in item 3.
 - c. This deposition will be recorded stenographically through the instant visual display of testimony, and by audiotape videotape
 - d. This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025.620(d).
2. The personal attendance of the custodian or other qualified witness and the production of the original records are required by this subpoena. The procedure authorized by Evidence Code sections 1560(b), 1561, and 1562 will not be deemed sufficient compliance with this subpoena.
3. The documents and things to be produced and any testing or sampling being sought are described as follows:
SEE ATTACHMENT 3
- Continued on Attachment 3.
4. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are described as follows:
 The environmental remediation of petroleum hydrocarbon contamination on the real property located at 1230 14th Street, Oakland, Ca.
 Continued on Attachment 4.
5. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.
6. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: July 20, 2007

XAVIER A.M. LAVOPIERRE
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)
ATTORNEY AT LAW
 (TITLE)

ATTACHMENT "3"

1. All Writings (as that term is defined in Evidence Code section 250) relating to the environmental remediation of petroleum hydrocarbon contamination on the real property located at 1230 14th Street, Oakland, California (the "Remediation").
2. All Writings (as that term is defined in Evidence Code section 250) relating to any communications between you (or the Alameda County Department of Health) and Shell Oil Company, or any of its agents or employees, regarding the Remediation.
3. All Writings (as that term is defined in Evidence Code section 250) relating to any communication between you (or the Alameda County Department of Health) and Cambria Environmental Technology, Inc., or any of its agents or employees, regarding the Remediation.
4. All Writings (as that term is defined in Evidence Code section 250) relating to any communication between you (or the Alameda County Department of Health) and Conestoga-Rovers & Associates, or any of its agents or employees, relating to the Remediation.
5. All Writings (as that term is defined in Evidence Code section 250) relating to any communication between you (or the Alameda County Department of Health) and Equiva Services LLC, or any of its agents or employees, relating to the Remediation.
6. All Writings (as that term is defined in Evidence Code section 250) relating to any communication between you (or the Alameda County Department of Health) and Equilon Enterprises LLC, or any of its agents or employees, relating to the Remediation.
7. All Writings (as that term is defined in Evidence Code section 250) relating to any communication between you (or the Alameda County Department of Health) and Shell Oil Products US, or any of its agents or employees, relating to the Remediation.
8. Your entire file relating to the real property located at 1230 14th Street, Oakland, California.