

NAVIGATING FDCPA PRACTICE POST HENSON AND OBDUSKEY-SAMPLE RULE 30(b)(6) Notice

NOTICE OF DEPOSITIONS

TO: See attached service list.

PLEASE TAKE NOTICE that, pursuant to Rule 30 (b)(6), and Rule 30 of the Federal Rules of Civil Procedure, we will take the depositions of the following parties for the purpose of discovery on the dates and times listed below. The depositions will take place at Esquire Deposition Services,xxxxxx. The depositions will be taken before a person authorized to administer oaths and will continue from day to day until completed. Plaintiffs' counsel may appear telephonically.

Deponent	Date/Time
1) Person(s) most knowledgeable as to Defendants' method of determining and recording within its records as to the applicable statute of limitations;	DATES AND TIME
2) Person(s) most knowledgeable about the collection letters attached to the Complaint in this matter, and specifically, the drafting and use of those letters, and Defendants' affirmative defense of bona fide error.	To begin after completion of previous deposition, and continue from day to day until completed;
3) All persons identified or referenced in Defendant's Fed.R.Civ.P. 26(a)(1) disclosures and any of Defendant's responses to discovery requests.	
4) Person(s) most knowledgeable about the Plaintiffs' accounts and attempts to collect from Plaintiffs including, without limitation, the collection letters attached to the Complaint in this matter, and specifically, the drafting and use of those letters.	
5) The person most knowledgeable about the debt collection letters sent to Plaintiffs as well as the loan and debt collection processes, policies, procedures, and practices, and information and records related to Plaintiffs' accounts and efforts to collect on the alleged debts owed by Plaintiffs;	
6) Person employed by any of the Defendants, who is most knowledgeable about the purchase, collection methods and strategies, and collection letters used by Defendants	

related to out-of-statute debt owed by persons in Illinois.	
7) Person most knowledgeable as to Defendants computer system, including search and query capabilities and specifically which fields may be used to conduct a query or search and whether how Defendants determine if a debtor received a specific form letter.	
8) Person(s) employed by defendants most knowledgeable about the relationship between defendants.	
9) Persons employed by defendants most knowledgeable about any affirmative defenses raised by Defendants including defendants' bona fide error defense.	
10) Information related to the corporate structure ownership, licensing, and registration of each of the Defendants	

Defendants are requested to produce the person or persons described. Should any of the above named or described individuals be unable to attend the deposition at the date and times indicated, **please notify our offices immediately**. However, these dates shall remain firm unless and until alternative dates are provided and confirmed by both parties.