

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>BARBARA ANN WILSON,</b>	)	
	)	
	)	<b>2:10-cv-02386-KOB</b>
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	
	)	
<b>THE BIRMINGHAM PUBLIC</b>	)	
<b>LIBRARY FOUNDATION; et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**PLAINTIFF’S OBJECTION TO NOTICE OF DEPOSITION**

The Plaintiff objects to the Notice of Deposition served on her by the Defendants as follows:

1. The Deposition Notice served on the Plaintiff includes the following language:

“Deponent is requested to bring with her at that time, for examination and/or copying, the following documents: Any and all records, documents, photographs, statements, bills or other writing or things you intend to use or rely on in the trial of this cause.”

The Plaintiff objects to this request as overbroad and vague and because it seeks information she knows only through communication with her attorney which is protected by the attorney-client privilege. She further objects because it calls for information protected by the work-product doctrine. In

addition, the Plaintiff's counsel, not the Plaintiff will make this  
determination, a determination which has not been made at this time.

Respectfully submitted,

*s/Adam P. Morel*

Adam P. Morel

**ATTORNEY FOR PLAINTIFF**

**OF COUNSEL:**

**LAW OFFICES OF ADAM MOREL, P.C.**

517 Beacon Parkway West

Birmingham, AL 35209

*Telephone: (205) 252-8841*

*Facsimile: (205) 252-3727*

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the above has been served on all counsel of record via electronic filing.

This the 24th day of May, 2011.

*s/Adam P. Morel*

\_\_\_\_\_  
**OF COUNSEL**