

1 STEPTOE & JOHNSON LLP
 2 Collier Center
 3 201 East Washington Street, Suite 1600
 4 Phoenix, Arizona 85004-2382
 Telephone: (602) 257-5200
 Facsimile: (602) 257-5299

5 David J. Bodney (006065)
 6 Dennis K. Blackhurst (021678)
 Attorneys for Defendants/Counterclaimants
 7 Regan Media, Inc. and Judith Regan

8 UNITED STATES DISTRICT COURT
 9 DISTRICT OF ARIZONA

10 JENNA MASSOLI p/k/a JENNA)
 11 JAMESON,)
 12) Plaintiff,)
 13 vs.)
 14 "REGAN MEDIA," and JUDITH)
 15 REGAN, an individual,)
 Defendants.)

No. CV 05-0854 PHX EHC

**RULE 30(B)(6) NOTICE OF
 DEPOSITION OF DOLCE
 AMORE, INC.**

16 _____)
 17 REGAN MEDIA, INC., a New York)
 18 corporation, and JUDITH REGAN, an)
 19 individual,)
 Defendants/Counterclaimants,)

(Assigned to the Honorable Earl H. Carroll)

20 vs.)
 21 JENNA MASSOLI p/k/a JENNA)
 22 JAMESON, an individual,)
 23 Plaintiff/Counterdefendant,)
 24 and)
 25 JAY GRDINA, an individual, and)
 26 DOLCE AMORE, INC., a Colorado)
 corporation,)
 Counterdefendants.)

1 **YOU ARE HEREBY NOTIFIED** that, pursuant to *Federal Rules of Civil*
2 *Procedure* 26 and 30(b)(6), Dolce Amore, Inc (“Dolce Amore”) is required to designate
3 one or more of the most knowledgeable officers, directors, or managing agents, or other
4 persons who consent to testify on Dolce Amore’s behalf, to appear and to testify as to the
5 matters known or reasonably available to Dolce Amore with respect to designated subjects
6 on which examination is requested. The matters on which examination is requested
7 pursuant to Rule 30(b)(6) are the factual bases of the claims and defenses asserted by
8 Dolce Amore in this action, including without limitation, the following matters:

9 1. Facts relating to the corporate ownership, structure and governance of Dolce
10 Amore;

11 2. Amounts received by Dolce Amore from the A&E Television Networks
12 (“A&E”) under the January 2005 Television Reality Series/Project Production Agreement
13 (the “A&E Contract”) between Dolce Amore and A&E;

14 3. Facts relating to the terms, drafting, negotiation and execution of the A&E
15 Contract;

16 4. Facts relating to Dolce Amore’s efforts to market or promote a potential
17 reality-based television program featuring Jenna Massoli p/k/a Jenna Jameson
18 (“Jameson”);

19 5. Facts relating to the terms, drafting, negotiation and execution of the
20 Exclusive Acting Services Agreement between Jameson and Dolce Amore as referenced
21 in the A&E Contract;

22 6. Facts relating to the terms, drafting, negotiation and execution of the Artist’s
23 Letter of Inducement executed by Jameson and attached to the A&E Contract;

24 7. Facts relating to Dolce Amore’s responses to Defendants/Counterclaimants’
25 First Set of Interrogatories and First Set of Requests for Production; and
26

1 8. Facts relating to amounts paid by Dolce Amore to Jameson, Jay Grdina or
2 any other person or entity from October 2003 to the present.

3 **DATE AND TIME OF DEPOSITION:** January 10, 2006 at 9:00 a.m.

4 **PLACE OF APPEARANCE:** STEPTOE & JOHNSON LLP
5 Collier Center
6 201 East Washington Street, Suite 1600
7 Phoenix, Arizona 85004-2382

8 Request for reasonable accommodations for persons with disabilities must be made
9 at least three judicial days in advance of a scheduled court proceeding.

10 DATED this 4th day of November, 2005.

11 STEPTOE & JOHNSON LLP

12 By /s/ David J. Bodney
13 David J. Bodney
14 Dennis K. Blackhurst
15 Collier Center
16 201 East Washington Street
17 Suite 1600
18 Phoenix, Arizona 85004-2382

19 Attorneys for Defendants/
20 Counterclaimants Regan Media, Inc. and
21 Judith Regan

22
23
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

CERTIFICATE OF SERVICE

I hereby certify that on the 4th day of November, 2005, I caused the attached document to be electronically transmitted to the Clerk’s Office using the CM/ECF System for filing and transmittal of a Notice of Electric Filing to the following CM/ECF Registrants:

James L. Blair
Roger William Hall
Renaud Cook Drury Mesaros, PA
Phelps Dodge Tower
One North Central, Suite 900
Phoenix, AZ 85004-4417

*Attorneys for Plaintiff/Counterdefendant and
Third-Party Counterdefendant*

I hereby certify that on the 4th day of November, 2005, I served the attached document by mail on the following, who are not registered participants of the CM/ECF System:

Bernard M. Brodsky
Jeffrey F. Reina
Lipsitz, Green, Fahringer, Roll, Salisbury & Cambria, LLP
42 Delaware Avenue, Suite 300
Buffalo, NY 14202-3857

*Attorneys for Plaintiff/Counterdefendant and
Third-Party Counterdefendant*

s/Lisa G. Morgan