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 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

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

(Assigned to the Honorable Earl H. Carroll)

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  
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CERTIFICATE OF SERVICE

I hereby certify that on the 4<sup>th</sup> day of May, 2006, 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:

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s/Elizabeth Gibson  
\_\_\_\_\_ 498040