

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 09-22423-CIV-JORDAN/McALILEY

R. TRAVIS COLLINS, as Personal Representative
of the Estate of DAVID KNOWLTON, deceased,

Plaintiff,

vs.

MARRIOTT INTERNATIONAL, INC., a Maryland
corporation; THE RITZ-CARLTON HOTEL
COMPANY, LLC, a Maryland corporation; THE
RITZ-CARLTON MANAGEMENT COMPANY,
LLC, a Maryland corporation; THE RITZ-CARLTON
HOTEL COMPANY, LTD., a foreign corporation;
THE ABACO CLUB RC, LTD., a foreign
corporation; and THE ABACO CLUB
ASSOCIATION, LTD., a foreign corporation,

Defendants.

THE RITZ-CARLTON HOTEL COMPANY, LTD.,
A foreign corporation; THE ABACO CLUB RC, LTD.,
A foreign corporation; and THE ABACO CLUB
ASSOCIATION, LTD., a foreign corporation,

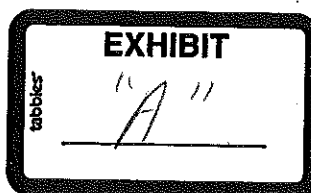
Defendants/Third Party Plaintiffs,

vs.

D. SCOTT LIBERTORE,

Third Party Defendant.

RE-NOTICE OF TAKING DEPOSITIONS
PURSUANT TO F.R.CIV.P. 30(b)(6)



Please take notice that **MARRIOTT INTERNATIONAL, INC.** is requested and required, pursuant to F.R.Civ.P. 30(b)(6), to designate and produce a person or persons to testify on behalf of **MARRIOTT INTERNATIONAL, INC.** on the matters listed below at **The Ritz Carlton Club Member Services Office, 6649 Westwood Boulevard, Third Floor, Orlando, Florida 32821**, to begin at 1 p.m. to 5 p.m. on Thursday, January 27, 2011, and from 9 a.m. to 3:00 p.m. on Friday, January 28, 2011:

The persons with the most knowledge of the following during 2006/2007:

- 1. The management structure of the entity involved in the day-to-day management of the Ritz Carlton at Winding Bay, Abaco, including the use of the name Ritz Carlton.**
- 2. Any and all agreements between Ritz Carlton Hotel Company, Ltd. and any other named Defendant in this action pertaining to the operation and management of the Ritz Carlton at Winding Bay, Abaco.**
- 3. Corporate structure for the implementation of procedures under each Defendant's Manual of Operations for the resort known as Ritz Carlton at Winding Bay, Abaco.**
- 4. Persons from any of the Defendant corporations who attended any meetings at Winding Bay to discuss the Ritz Carlton at Winding Bay, Abaco, and its operations.**
- 5. Persons and procedures in effect for the ordering of merchandise necessary for the operation of the Ritz Carlton at Winding Bay, Abaco.**
- 6. Procedures for the ordering of all merchandise necessary for the operation of the Ritz Carlton at Winding Bay, Abaco.**
- 7. Procedures between the Defendant corporations for the reporting on finances and services necessary for the operation of the Ritz Carlton at Winding Bay, Abaco.**
- 8. Persons and procedures in place for the platting, recording, and sale of lots and homes at the Ritz Carlton at Winding Bay, Abaco, located at or on that area known as "The Point."**

9. All visits by representatives of MARRIOTT INTERNATIONAL, INC. to the Ritz Carlton at Winding Bay, Abaco, and the purpose of each visit.
10. All visits to MARRIOTT INTERNATIONAL, INC. by representatives of Ritz Carlton at Winding Bay, Abaco, and the purpose of each visit.

upon oral examination before Central Florida Reporters Notary Public, or any other Notary Public or officer authorized by law to take depositions. The oral examination will continue from day to day until completed. These depositions are being taken for the purpose of discovery, for use at trial, or for such other purposes as are permitted under the rules of the Court.

Certificate of Service

We hereby certify that a true copy of the foregoing was sent via electronic and regular mail this 22nd day of December, 2010, to all counsel on the attached Service List.

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