

EXHIBIT B

Averil Andrews

From: Sean Santini
Sent: Tuesday, August 12, 2014 4:56 PM
To: Avelino Gonzalez
Cc: Averil Andrews; Betty Caballero; avelinogonzalez@bellsouth.net
Subject: 14-08-12-Second Notice of Taking Deposition of Plaintiff Corbacho
Attachments: 14-08-12-Second Notice of Taking Deposition of Plaintiff Corbacho.pdf

Hello, Kenia. With August 7 having come and gone, attached is a second notice for the taking of your client's deposition. I've noticed the deposition for September 12, but, as with the previous notice, I'm happy to work with you on dates that make sense for both of us. Let me know, please. Also, please let me know whether I'll need to arrange for an interpreter.

Regards,

Sean

Sean R. Santini
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IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF FLORIDA

MIAMI DIVISION

CASE NO.: 1:13-cv-22589-KMW

MIGUEL ANGEL CORBACHO
DAUDINOT

Plaintiff,

v.

YASIEL PUIG VALDES a/k/a
YASIEL PUIG and MARITZA
VALDES GONZALEZ,

Defendants.

SECOND NOTICE OF TAKING DEPOSITION

To: Avelino J. Gonzalez
Kenia Bravo
Avelino J. Gonzalez, P.A.
6780 Coral Way
Miami, FL 33155

Networking Reporting
44 W. Flagler St., Suite 1200
Miami, FL 33130

PLEASE TAKE NOTICE that, pursuant to Federal Rule of Civil Procedure 30, defendants, by and through their undersigned attorneys, will take the deposition upon oral examination of plaintiff, Miguel Angel Corbacho Daudinot.

The deposition will commence at 10:00 a.m. on September 12, 2014, take place at the offices of Santini Law, 1001 Brickell Bay Drive, Suite 2650, Miami Florida 33131, and will continue day to day until completed. The deposition will be recorded stenographically before a notary public or other officer authorized to administer oaths and is being taken for the purpose of discovery, for use at hearing, for trial, or for such other purposes as are permitted under the applicable and governing rules.

In accordance with the Americans with Disabilities Act, individuals who have a disability which may need accommodation should contact Sean R. Santini seven days prior to the deposition.

Dated this 12th day of August, 2014

Respectfully submitted,

SANTINI LAW
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By: /s/ Sean R. Santini

Sean R. Santini
Florida Bar No. 832898

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of August, 2014 a true and correct copy of the foregoing was served on all counsel of record identified on the attached Service List, in the manner specified.

/s/ Sean R. Santini

Sean R. Santini

SERVICE LIST

Kenia Bravo
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Via Email and U.S. Mail