#### Doc. 74 Att. 4

# **EXHIBIT D**

## 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,

٧.

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

Defendants.	

#### FOURTH NOTICE OF TAKING DEPOSITION

[Re-Noticed at Plaintiff's Counsel's Request]

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 Tuesday, April 21, 2015, 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 6th day of March, 2015.

Respectfully,

**Santini Law** 1001 Brickell Bay Drive, Suite 2650

Miami, Florida 33131 Telephone: (305) 372-7307

By: <u>/s/ Sean R. Santini</u>
Sean R. Santini
Florida Bar Number: 832898
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Averil K. Andrews Florida Bar Number: 105700

aandrews@santinilawfirm.com

### **CERTIFICATE OF SERVICE**

I hereby certify that on this 6th day of March, 2015 a true and correct copy of the foregoing was served via email and U.S. Mail on all counsel of record identified on the attached Service List.

/s/ Averil K. Andrews
Averil K. Andrews

### **SERVICE LIST**

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