

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA**

MAUREEN TOFFOLONI,)
as Administrator and Personal)
Representative of the ESTATE)
OF NANCY E. BENOIT,)
Plaintiff,)

CASE NO. 1:08-cv-00421-TWT

vs.)

LFP PUBLISHING GROUP, LLC,)
d/b/a Hustler Magazine, et al,)
Defendant.)

NOTICE OF DEPOSITION

To: Usha Nair-Reichert, Ph.D.
c/o Richard Decker, attorney for Plaintiff
HALLMAN & WINGATE, LLC
166 Anderson Street, S.E.
Suite 210
Marietta, Georgia 30060

PLEASE TAKE NOTICE that, pursuant to Fed. R. Civ. P. 26(b)(4)(A), on Monday, June 28, 2010, beginning at 10:00 A.M., Defendant LFP Publishing Group, LLC, d/b/a Hustler Magazine, et al., by and through its attorneys, will take the deposition of Usha Nair-Reichert, Ph.D., upon oral examination, for purposes of discovery, cross-examination and all proper purposes under the Federal Rules of Civil Procedure, before a Notary Public or some other officer duly authorized by

law to administer oaths. The deposition is to be taken for use in this action, in the United States District Court for the Northern District of Georgia, Atlanta Division, Civil Action File Number 1:08-CV-00421-TWT.

The deposition of Dr. Nair-Reichert will take place at the office of Hallman & Wingate, LLC, 166 Anderson Street, S.E., Suite 210, Marietta, Georgia 30060. The deposition will be recorded both stenographically and by videotape.

Respectfully submitted this 10th day of June 2010.

/s/ Darrell J. Solomon

James C. Rawls
Georgia Bar No. 596050
Barry J. Armstrong
Georgia Bar No. 022055
S. Derek Bauer
Georgia Bar No. 042537
Darrell J. Solomon
Georgia Bar No. 305922

McKENNA LONG & ALDRIDGE LLP
303 Peachtree Street, NE, Suite 5300
Atlanta, Georgia 30308
(404) 527-4000
(404) 527-4198 (facsimile)

Pro hac vice:

Paul J. Cambria, Jr.
Jeffrey Reina
William M. Feigenbaum

LIPSITZ GREEN SCIME CAMBRIA
LLP
42 Delaware Avenue, Suite 120
Buffalo, NY 14202-3924
(716) 849-1333
(716) 849-1315 (facsimile)

Attorneys for LFP Publishing Group,
LLC

CERTIFICATE OF SERVICE

I hereby certify that I have electronically filed the within and foregoing **NOTICE OF DEPOSITION** with the Clerk of Court using the CM/ECF system which will automatically send email notification of such filing to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 10th day of June 2010.

/s/ Darrell J. Solomon
Darrell J. Solomon
Georgia Bar No. 305922