

**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 OF TYLER DOWNEY**

TO: Richard P. Decker, Esq.  
Hallman & Wingate, LLC  
166 Anderson Street, S.E.  
Suite 210  
Marietta, Georgia 30060

PLEASE TAKE NOTICE pursuant to Fed. R. Civ. P. 30 that on April 21, 2011, beginning at 1:30 p.m. CDT, Defendant LFP Publishing Group, LLC, d/b/a Hustler Magazine, et al., by and through its attorneys, will take the deposition of Mr. Tyler Downey of 301 East 70th Terrace, Kansas City, Missouri 64113, upon oral examination, for use at trial 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 Mr. Downey will take place at the offices of Midwest Litigation Services, 1301 Oak Street, Kansas City, Missouri 64106, and will be conducted remotely via video conference as stipulated by the parties. The deposition will be recorded both stenographically and by videotape.

Respectfully submitted this 20<sup>th</sup> day of April 2011.

*/s/ Darrell J. Solomon*

Darrell J. Solomon  
Georgia Bar No. 305922

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

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**CERTIFICATE OF SERVICE**

This is to certify that I have this day filed the within and foregoing Notice of Deposition of Tyler Downey via the CM/ECF system which will automatically send notification to Plaintiff's attorneys of record, who are participants in the CM/ECF system.

This 20<sup>th</sup> day of April 2011.

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

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