

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

RYAN MCFADYEN, ET AL.,

Plaintiffs,

v.

DUKE UNIVERSITY, ET AL.

Defendants.

1:07-CV-953

**PLAINTIFFS' CROSS NOTICE OF DEPOSITION OF
DUKE UNIVERSITY PURSUANT TO FEDERAL RULE
OF CIVIL PROCEDURE 30(b)(6)**

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 30(b)(6) and the LR16(c) Initial Pretrial Order in this case, Plaintiffs hereby cross notice and will depose by oral examination Defendant Duke University on topics 1-5, ⁷1 and topics 6-10, 12, 14-17² before an officer authorized by law to administer the oath in the State of North Carolina and/or pursuant to the Federal Rules of Civil Procedure. As counsel for the Defendants, you are hereby requested to appear and participate in the taking of the deposition. The deposition will be recorded by stenographic means and will be videotaped.

Dated: December 9, 2011

Respectfully submitted by:

EKSTRAND & EKSTRAND LLP

¹ Because of a conflict created on January 20, 2012 with the deposition of Joseph Alleva, Plaintiffs cross notice these topics pursuant to the Court's Order, but state that the deposition will need to be held open to another date where Plaintiffs' counsel is not deposing another individual in this case.

² Plaintiffs' counsel cross notices topic 16, but reserves the right to notice their own 30(b)(6) deposition topic in the future addressing the supervision of other individuals.

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CERTIFICATE OF SERVICE³

I hereby certify that on December 9, 2011, a copy of the foregoing Plaintiffs' Cross Notice of Deposition of Duke University Pursuant to Federal Rule of Civil Procedure 30(b)(6) was served via electronic mail, pursuant to agreement, to the following counsel of record:

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³ Pursuant to the Court's Order, Plaintiffs' counsel in Carrington, et al. v. Duke University, et al., 1:08-cv-119, have been provided with these discovery requests via electronic mail.

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