
Avagliano v. Sumitomo: On Remand to the
District Court

Sumitomo Shoji America, Inc. v. Avagliano, 457
US 176 - Supreme Court 1982

2-20-1986

Defendant's Notice to Take Deposition of Treadway Corp Officer

Sumitomo Corporation of America

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
LISA M. AVAGLIANO, et al., :
 :
 : Plaintiffs, :
 : 77 Civ. 5641 (CHT)
 :
 : v. :
 :
 : SUMITOMO SHOJI AMERICA, INC. : NOTICE TO TAKE
 : DEPOSITION
 : Defendant. :
-----X

-----X
PALMA INCHERCHERA, : 82 Civ. 4930 (CHT)
 :
 : Plaintiff, :
 :
 : v. :
 :
 : SUMITOMO CORP. OF AMERICA, :
 :
 : Defendant. :
-----X

PLEASE TAKE NOTICE that pursuant to Rule 30 of the Federal Rules of Civil Procedure, defendant Sumitomo Corporation of America will take the deposition upon oral examination of Treadway Corporation by an officer, director, managing agent or other person having knowledge of personnel documents kept by the corporation relating to past and present rotating and non-rotating staff, commencing at 10:00 a.m. on the 21st day of March, 1986 at the offices of Epstein Becker Borsody & Green, P.C., 250 Park Avenue, New York, New York 10177.


The witness shall bring with him or her all documents pertaining to deponent of a type identified in paragraphs 2 and

4 of the Stipulation and Order in these actions issued October 24, 1985. Such documents are hereby designated as "Confidential" pursuant to paragraph 1(3) of the Confidentiality Order in these actions issued November 7, 1984. Such documents shall be stamped "Confidential" upon their production in accordance with said Confidentiality Order.

Dated: New York, New York
February 20, 1986

Yours, etc.

EPSTEIN BECKER BORSODY & GREEN, P.C.

By: 
* Gregory K. Hiestand
Attorneys for Defendants
250 Park Avenue
New York, New York 10177
(212) 370-9800

To: Steel & Bellman, P.C.
Attorneys for Plaintiffs
351 Broadway
New York, New York 10013

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
77 Civ. 5641 (CHT)
82 Civ. 4930 (CHT)

LISA M. AVAGLIANO, et al.,

Plaintiffs,

v.

SUMITOMO SHOJI AMERICA, INC.

Defendant.

PALMA INCHERCHERA,

Plaintiff,

v.

SUMITOMO CORPORATION OF AMERICA,

Defendant.

NOTICE TO TAKE DEPOSITION

EPSTEIN BECKER BORSODY & GREEN, P.C.

250 PARK AVENUE

NEW YORK, NEW YORK 10177-0077

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Attorneys for Defendant