

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

JOHN W. FERRON,	:	
	:	
Plaintiff,	:	Civil Action No. 2:06-cv-322
	:	
vs.	:	Judge Frost
	:	
VC E-COMMERCE	:	Magistrate Judge Abel
SOLUTIONS, INC., <i>et al.</i>	:	
	:	
Defendants.	:	

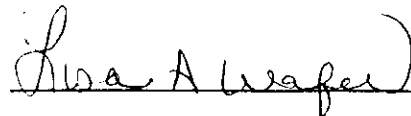
**PLAINTIFF'S NOTICE TO TAKE DEPOSITIONS**

NOW COMES PLAINTIFF, by and through the undersigned counsel and pursuant to Rule 30 of the Federal Rules of Civil Procedure, hereby gives notice that he will conduct the following depositions on the dates and at the times indicated below:

<u>Deponent</u>	<u>Date</u>	<u>Time</u>
Scott Richter	October 2, 2006	9:00 a.m.
Steve Richter	October 3, 2006	9:00 a.m.

These depositions shall be conducted at the offices of Plaintiff's counsel at 580 North Fourth Street, Suite 450, Columbus, Ohio 43215, shall be taken before an officer authorized to administer oaths, shall continue from time to time and day to day until completed or adjourned, and may be used in evidence at trial or other proceedings.

Respectfully submitted,

  
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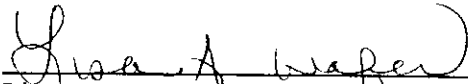
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(614) 228-5225, 228-3255 fax

Attorneys for Plaintiff, John W. Ferron

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing pleading was served this 15<sup>th</sup> day of August, 2006 upon the below-named Trial Attorney for Defendants VC E-Commerce Solutions, Inc. and OptinRealbig.com, LLC, via fax (courtesy copy via regular U.S. mail):

CHRISTINA J. MARSHALL (0069963)  
Sutter, O'Connell & Farchione  
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1301 E. 9<sup>th</sup> Street  
Cleveland, Ohio 44114  
(216) 928-2200, 928-4400 (fax)  
Trial Attorney for Defendants,

  
Lisa A. Wafer, Trial Attorney