

CAUSE NO. D-1-GN-14-005114

JAMES STEELE, et al., <i>Plaintiffs,</i>	§	IN THE DISTRICT COURT OF
	§	
	§	
vs.	§	TRAVIS COUNTY, TEXAS
	§	
GTECH CORPORATION, <i>Defendant.</i>	§	
	§	201 <sup>st</sup> JUDICIAL DISTRICT
	§	

**PLAINTIFFS' NOTICE OF VIDEO TAPED DEPOSITION OF TOM STANEK  
AND SUBPOENA DUCES TECUM**

TO: Tom Stanek, by and through his attorney of record: Kenneth E. Broughton, Francisco Rivero, and Arturo Munoz, REED SMITH, LLP, 811 Main Street, Suite 1700, Houston, Texas 77002.

Please take notice that under the Texas Rules of Civil Procedure, Plaintiffs will take the deposition of Tom Stanek at the office of DuBois, Bryan and Campbell, 303 Colorado Street, Suite 2300, Austin, Texas 78701 on **September 24, 2015 at 1:30 p.m.** The deposition will be recorded stenographically and by videotape. The stenographic and videotape recording will be conducted by Kim Tindall & Associates, 1701 Directors Blvd. #730, Austin, Texas 78744, Tel. 512-263-7250.

Tom Stanek should produce at the deposition the documents, to the extent not already produced, listed in Exhibit "A" to this notice.

Respectfully submitted,

**LAGARDE LAW FIRM, P.C.**



---

Richard L. LaGarde  
SBN: 11819550  
Mary Ellis LaGarde  
SBN: 24037645  
3000 Wesleyan Street, Suite 380  
Houston, Texas 77027  
Telephone: (713) 993-0660  
Facsimile: (713) 993-9007  
Email: richard@lagardelaw.com  
mary@lagardelaw.com

**COUNSEL FOR PLAINTIFFS**

**MANFRED STERNBERG & ASSOCIATES, P.C.**



---

Manfred Sternberg  
SBN: 19175775  
4550 Post Oak Place Dr. #119  
Houston, TX 77027  
Telephone: (713) 622-4300  
Facsimile: (713) 622-9899  
Email: manfred@msternberg.com

**CO-COUNSEL FOR PLAINTIFFS**

**CERTIFICATE OF SERVICE**

The undersigned certifies that a true and correct copy of the foregoing instrument was served upon the attorneys of record of all parties to the above cause in accordance with Texas Rules of Civil Procedure on the 21st day of August, 2015.

Kenneth E. Broughton  
Francisco Rivero  
Arturo Munoz  
REED SMITH, LLP  
811 Main Street, Suite 1700  
Houston, TX 77002  
Telephone: (713) 469-3819  
Facsimile: (713) 469-3899  
Email: kbroughton@reedsmith.com  
frivero@reedsmith.com  
amunoz@reedsmith.com

**COUNSEL FOR DEFENDANT  
GTECH CORPORATION**

Leroy B. Scott  
SCOTT ESQ.  
3131 McKinney Ave., Ste. 600  
Dallas, TX 75204  
Telephone: (214) 224-0802  
Facsimile: (214) 224-0802  
Email: lscott@scottesq.com

**COUNSEL FOR INTERVENOR,  
KENYATTA JACOBS**

James D. Hurst  
JAMES D. HURST, P.C.  
1202 Sam Houston Ave.  
Huntsville, TX 77340  
Telephone: (936) 295-5091  
Facsimile: (936) 295-5792  
Email: jdhurst@sbcglobal.net

**COUNSEL FOR INTERVENORS,  
JAFREH AND BECHTOLD**

Clinton E. Wells JR.  
McDOWELL WELLS, L.L.P.  
603 Avondale  
Houston, TX 77006  
Telephone: (713) 655-9595  
Facsimile: (713) 655-7868  
Email: cew@houstontrialattorneys.com

**COUNSEL FOR INTERVENORS,  
BOGHOSIAN, WILSON, AND BAMBICO**

Andrew G. Khoury  
KHOURY LAW FIRM  
2002 Judson Road, Ste. 204  
Longview, TX 75606-1151  
Telephone: 903-757-3992  
Facsimile: 903-704-4759  
Email: andy@khourylawfirm.com

**COUNSEL FOR INTERVENORS,  
THOMAS GREGORY, ET AL.**

Daniel H. Byrne  
Lessie G. Fitzpatrick  
FRITZ, BYNRE, HEAD & HARRISON, PLLC  
98 San Jacinto Blvd., Ste. 2000  
Austin, TX 78701  
Telephone: (512) 476-2020  
Facsimile: (512) 477-5267  
Email: dbyrne@fbhh.com  
lfitzpatrick@fbhh.com

**COUNSEL FOR INTERVENORS,  
HIATT, ET AL.**

Leonard E. Cox  
P.O. Box 1127  
Seabrook, TX 77586  
Telephone: (281) 532-0801  
Facsimile: (281) 532-0806  
Email: Lawyercox@lawyercox.com

**COUNSEL FOR INTERVENORS,  
YARBROUGH AND CLARK**

Jerry B. Register  
JERRY B REGISTER P.C.  
1202 Sam Houston Ave.  
P.O. Box 1402  
Huntsville, TX 77342  
Tel: (936) 295-9109  
Fax: (936) 295-4424  
Email: jbreg@sbcglobal.net

**COUNSEL FOR INTERVENOR,  
MICHAEL CRIST**

Christopher S. Hamilton  
Andrea L. Fitzgerald  
STANDLY AND HAMILTON, L.L.P.  
325 N. St. Paul Street, Suite 3300  
Dallas, Texas 75201  
Tel: 214-234-7900  
Fax: 214-234-7300  
Email: chamilton@standlyhamilton.com  
afitzgerald@standlyhamilton.com

**COUNSEL FOR INTERVENOR THOMAS G. JONES**

Wes Dauphinot  
DAUPHINOT LAW FIRM  
900 Wes Abram  
Arlington, TX 76013  
Tel: 817-462-0676  
Fax: 817-704-4788  
Email: wes@dauphinotlawfirm.com

William Pratt  
LAW OFFICE OF WILLIAM PRATT  
3265 Lackland Road  
Fort Worth, TX 76010  
Tel: 817-738-4940  
Fax: 817-738-4161  
Email: lawofficeoffice@yahoo.com

**COUNSEL FOR INTERVENORS,  
DIANE LACROIX AND DANIEL LACROIX, JR.**

William S. Webb  
KRAFT & ASSOCIATES, P.C.  
2777 Stemmons Freeway, Suite 1300  
Dallas, Texas 75207  
Tel: 214-999-9999  
Fax: 214-637-2118  
Email: swebb@kraftlaw.com

**COUNSEL FOR INTERVENORS,  
WILEY-BEAMON, ET AL.**

Paul T. Morin  
PAUL T. MORIN, P.C.  
503 W. 14<sup>th</sup> Street  
Austin, Texas 78701  
Tel: 512-499-8200  
Fax: 512-499-8203  
Email: PMorin@austin.rr.com

**COUNSEL FOR INTERVENOR,  
AILEHS GAINES**

A handwritten signature in black ink, appearing to read "R. L. Lagarde". The signature is fluid and cursive, with a large initial "R" and a long, sweeping tail.

---

RICHARD L. LAGARDE

## Exhibit "A"

The deponent is hereby notified to produce at the time of the deposition the following documents. As used in this Notice, the term "document" means, without limitation, the following items, whether printed or recorded or reproduced by any other mechanical process, or written or produced by hand: agreements, communications, state and federal governmental hearings and reports, correspondence, telegrams, memoranda, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, graphs, reports, notebooks, note charts, plans, drawings, sketches, maps, summaries or records of meetings or conferences, summaries or reports of investigations or negotiations, opinions or reports of consultants, radiographs, photographs, video, brochures, pamphlets, advertisements, circulars, press releases, drafts, letters, any marginal comments appearing on any document, and all other writings.

1. Produce all Documents that relate to, refer to, or reflect Communications between you or GTECH Corporation and the Texas Lottery Commission regarding Instant Game No. 1592.
2. Produce all Documents that relate to, refer to, or reflect Communications between you or GTECH Corporation and scratch-off ticket retailers regarding Instant Game No. 1592.
3. Produce all Documents that relate to, refer to, or reflect Communications between you or GTECH Corporation and persons or entities other than the Texas Lottery Commission regarding Instant Game No. 1592.
4. Produce all Documents that relate to, refer to, or reflect Communications internal to GTECH Corporation regarding Instant Game No. 1592. This is meant to include all communications to or from Lottery Service Representatives regarding Instant Game No. 1592.
5. Produce all Documents that relate to, refer to, or reflect complaints or concerns regarding Game 5 of the Fun 5's game.

6. Produce all Documents that relate to, refer to, or reflect Communications regarding the closing of Instant Game No. 1592.