

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 st JUDICIAL DISTRICT
	§	

**PLAINTIFFS' NOTICE OF VIDEO TAPED DEPOSITION OF GARY GRIEF
AND SUBPOENA DUCES TECUM**

TO: Gary Grief, by and through his attorney of record: Ryan S. Mindell, Office of the Attorney General, 300 W. 15th Street, Austin, Texas 78701.

Please take notice that under the Texas Rules of Civil Procedure, Plaintiffs will take the deposition of Gary Grief at the Office of the Attorney General, 300 W. 15th Street, Austin, Texas 78701 on **September 25, 2015 at 9:30 a.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.

Gary Grief should produce at the deposition the documents listed in Exhibit "A" to this notice.

Respectfully submitted,

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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 10th day of August, 2015.

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WILEY-BEAMON, ET AL.**

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 his deposition the following documents:

1. Produce all e-mails sent by or received by Gary Grief between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.
2. Produce all memoranda or notes of phone calls made by or received by Gary Grief between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.
3. Produce all memoranda or notes of meetings in which Gary Grief participated between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.
4. Produce all text messages sent by or received by Gary Grief between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.
5. Produce all facsimile messages sent by or received by Gary Grief between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.
6. Produce all mail sent by or received by Gary Grief between September 1, 2014 and October 22, 2014 that referred to or regarded Texas Lottery Instant Game No. 1592.