

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 DAN MORALES
AND SUBPOENA DUCES TECUM**

TO: Dan Morales, 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 Dan Morales at the office of DuBois, Bryan and Campbell, 303 Colorado Street, Suite 2300, Austin, Texas 78701 on **September 24, 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.

Dan Morales should produce at the deposition the documents, to the extent not already produced, 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 21st day of August, 2015.

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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.