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5 **Attorneys for:** Defendants Chad Srinikrish,
Lawrence Levitisan, Optimum Technology Solutions Pvt. Ltd.,
6 and Optimum Technology Solutions, LLC

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 HEALTHBILL SYSTEMS, LLC,

12 Plaintiff,

13 vs.

14 CHAD SRINIKRISH, LAWRENCE
15 LEVITISAN, OPTIMUM TECHNOLOGY
SOLUTIONS PVT. LTD., AND OPTIMUM
16 TECHNOLOGY SOLUTIONS, LLC,

17 Defendants.
18

) Case No. 2:09-cv-038923-VSP (BRL)

) **NOTICE OF DEPOSITION OF STEPHEN**
) **RALAKANO; REQUEST FOR**
) **PRODUCTION OF DOCUMENTS**

) Date: August 29, 2011

) Time: 10:00 a.m.

) Location: McKasson & Klein, LLP
2211 Michelson Dr.

) Suite 320

) Irvine, CA 91612
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20 **TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:**

21 Pursuant to Federal Rule of Civil Procedure 30, please take notice that Defendants
22 Chad Srinikrish, Lawrence Levitisan, Optimum Technology Solutions Pvt. Ltd., and
23 Optimum Technology Solutions, LLC will take the deposition of Stephen Ralakano on
24 August 29th 2011, at 10:00 a.m. at the offices of McKasson & Klein, LLP, located at 2211
Michelson Drive, Suite 320, Irvine, CA 92612.

25 This deposition will be taken pursuant to FRCP 30 *et seq.* and before a Certified
26 Shorthand Reporter. If this deposition is not completed on said date, the taking thereof will
27 continue from day to day thereafter, at the same time and place, Sundays and holidays
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1 excepted, until so completed.

2 The noticing party may use LiveNote, or other computer software to obtain an instant
3 visual display of the testimony. Further, the oral examination will be recorded
4 stenographically and may also be videotaped.

5 A list of all parties or attorneys for parties on whom this Notice of Deposition is served is
6 shown on the accompanying Proof of Service.

7 **YOU ARE FURTHER NOTIFIED THAT** Defendants demand that Mr. Ralakano produce
8 the following documents at the deposition:

9 **DEFINITIONS**

10 As used herein, the term “**HEALTHBILL**” refers to Plaintiff Healthbill Systems, LLC.

11 As used herein, the terms “**YOU**” or “**YOUR**” refer to and include Stephen Ralakano
12 and each person and/or entity acting on his behalf, including but not limited to his agents,
13 assigns, and representatives.

14 As used herein, the term “**DEFENDANTS**” refers to Defendants Chad Srinikrish,
15 Lawrence Levitisan, Optimum Technology Solutions Pvt. Ltd., and Optimum Technology
16 Solutions, LLC.

17 As used herein, the term “**DOCUMENTS**” means each and every original or copy of
18 words or information by printing, typing, longhand, electronic recording, or other process,
19 regardless of the form thereof. Such term includes, but is not limited to, published
20 materials, reports, correspondence, records, memoranda, notices, notes, marginal
21 notations, messages, teletype printouts, statements, books, studies, minutes, diagrams,
22 drawings, maps, surveys, plans, charts, graphs, data, computer files, computer tapes,
23 computer disks, computer printouts, appointment books, telephone message tapes,
24 telephone message slips, drafts, checks, money orders, invoices, billings, evaluations,
25 photographs, audiotapes and videotapes.

26 As used herein, the term “**COMMUNICATIONS**” refers to any conversation, discussion,
27 letter, memorandum, meeting, note, email, text, telephone note, or other transfer of
28

1 information, whether written, oral or by other means, and includes any **DOCUMENT** which
2 abstracts, digests, transcribes or records such **COMMUNICATIONS**.

3 **REQUESTS FOR PRODUCTION**

4 **REQUEST FOR PRODUCTION NO. 1:**

5 All **COMMUNICATIONS** between **YOU** and Chad Srinikrish.

6 **REQUEST FOR PRODUCTION NO. 2:**

7 All **COMMUNICATIONS** between **YOU** and Lawrence Levitisan.

8 **REQUEST FOR PRODUCTION NO. 3:**

9 All **COMMUNICATIONS** between **YOU** and Casston Medical Group, Inc. since January
10 1st 2005.

11 **REQUEST FOR PRODUCTION NO. 4:**

12 All **DOCUMENTS** executed by **YOU** representing or concerning any employment
13 agreements between **HEALTHBILL** and Chad Srinikrish.

14 **REQUEST FOR PRODUCTION NO. 5:**

15 Any signed copy of the July 1st, 2004 "Employment Agreement," attached by
16 **HEALTHBILL** to its Complaint, allegedly between **HEALTHBILL** and Chad Srinikrish.

17
18 Date: July 26, 2011

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20 _____
21 Michaël Fischer
22 **MCKASSON & KLEIN LLP**
23 Attorneys for Defendants Chad
24 Srinikrish, Lawrence Levitisan,
25 Optimum Technology Solutions Pvt. Ltd.,
26 and Optimum Technology Solutions, LLC
27
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1 **PROOF OF SERVICE**

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3 I am a citizen of the United States and employed in Orange County, California. I am
4 over the age of eighteen years and not a party to the within-entitled action. My business
5 address is 2211 Michelson Drive, Suite 320, Irvine, California 92612.

6 On July 26, 2011, I served the foregoing document described as **NOTICE OF
7 DEPOSITION OF STEPHEN RALAKANO; REQUEST FOR PRODUCTION OF
8 DOCUMENTS** on the interested party(ies) in this action by placing a true copy thereof
9 enclosed in a sealed envelope addressed as follows:

10 XXXXXXXXXXXXXXXXXXXXXXXX

11 **Attorneys for Plaintiff Healthbill Systems, LLC**

12 **U.S. MAIL** – I am readily familiar with this firm’s business practice for mailing with
13 the United States Postal Service. Under this practice, I have deposited with the **United
14 States Postal Service** the foregoing document(s) in a postage pre-paid sealed envelope,
15 addressed as set forth above, in the ordinary course of business.

16 XXX **VIA OVERNIGHT DELIVERY** – I am readily familiar with the firm’s practice for the
17 daily collection and processing of deliveries with **Federal Express**. Under this practice, I
18 have deposited the foregoing document(s) in a sealed envelope, addressed as set forth
19 above in the ordinary course of business.

20 I declare under penalty of perjury under the laws of the United States of America and
21 the State of California that the foregoing is true and correct.

22 Executed on July 26, 2011, at Irvine, California.

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Tiffany Kossick