

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

GORDON REES SCULLY MANSUKHANI, LLP

Index No.: 151659/2015

Plaintiff,

NOTICE OF DEPOSITION

v.

ALEXANDER E. RODRIGUEZ,

Defendant.

PLEASE TAKE NOTICE that, Pursuant to Article 31, the deposition upon oral examination of Defendant ALEXANDER E. RODRIGUEZ, will be taken on the 24th day of April, 2015 at 10:00 in the forenoon of that day at the office of GORDON REES SCULLY MANSUKHANI, LLP, located at One Battery Park Plaza, 28th Floor, New York, New York 10004.

Pursuant to CPLR §3111, you are required to bring with you to the deposition all documents, e-mails, records, communications, reports, correspondence, letters, memoranda, summaries or records of telephone conversations, records of personal conversations, agreements, invoices, checks, bank statements, records of wire transfers, summaries or reports of investigations or negotiations, tape recordings, and transcripts of recordings (collectively "Documents"), including, but not limited to Documents regarding (and, specifically communications with) Anthony Bosch, Desiree Perez, Jose "Pepe" Gomez, representatives of Roc Nation, Andrew O'Connell, representatives of Guidepost Solutions, and with any attorney, investigator, or law firm that has represented you in any form or fashion regarding Major League Baseball's investigation of you regarding your use of substances banned by the Joint Drug

Agreement, and all such Documents in your possession regarding your appeal of your suspension by Major League Baseball.

The deposition will be taken before an individual authorized to administer oaths. The deposition shall continue from day to day until completion.

GORDON REES SCULLY MANSUKHANI, LLP

By: 
Peter G. Siachos

One Battery Park Plaza, 28th Floor
New York, New York 10004
Tel: (212) 269-5500
Fax: (212) 269-5505
e-mail: psiachos@gordonrees.com

Dated: March 28, 2015
New York, New York

TO: Bradley Simon, Esq.
Brian Waller, Esq.
Simon & Partners LLP
The French Building
551 Fifth Avenue
New York, NY 10176

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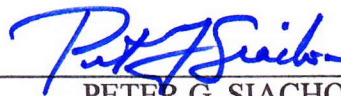
AFFIRMATION OF SERVICE

PETER G. SIACHOS, an attorney duly admitted to practice law before the courts of the State of New York, hereby affirms the following under the penalties of perjury:

I am attorney with the law firm of GORDON REES SCULLY MANSUKHANI, LLP ("Plaintiff"), in the above referenced matter.

On March 28, 2015, I caused to be served upon counsel of record for Defendant a Notice of Deposition of Defendant ALEX E. RODRIGUEZ by placing true copies of the same in a securely sealed envelope, under the exclusive care and custody of FedEx and by emailing an electronic version of the document to:

Bradley Simon, Esq.
bradsimon@simonlawyers.com
Brian Waller, Esq.
brianwaller@simonlawyers.com
Simon & Partners LLP
The French Building
551 Fifth Avenue
New York, NY 10176



PETER G. SIACHOS