

BARRY & RANDOLPH, LLP

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August 14, 2001

FACSIMILE TRANSMISSION AND U.S. MAIL (301) 415-3200

Charles E. Mullins
US NRC
Washington, D.C. 20555

Re: James Saum v. Sacramento Municipal Utility District, et al.

Dear Mr. Mullins:

Enclosed please find a copy of the Notice of Taking Deposition and Deposition Subpoena for the deposition of Philip Joukoff noticed for September 6 and 7, 2001.

If you have any questions regarding this matter, please feel free to contact me.

Very truly yours,

BARRY & RANDOLPH, LLP



LOTTE COLBERT

Enclosures

LC:tjb
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Fax 916•443•2124



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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, state bar number, and address): ADRIAN L. RANDOLPH, S.B.#133577 BARRY & RANDOLPH, LLP 1000 G Street, Suite 100 Sacramento, CA 95814 TELEPHONE NO.: (916) 443-4443 FAX NO.: (916) 443-2124 ATTORNEY FOR (Name): Defendants	FOR COURT USE ONLY CASE NUMBER: 01AS01077
NAME OF COURT: SACRAMENTO COUNTY SUPERIOR COURT STREET ADDRESS: 720 Ninth Street MAILING ADDRESS: CITY AND ZIP CODE: Sacramento, CA 95814 BRANCH NAME:	
PLAINTIFF/ PETITIONER: JAMES SAUM DEFENDANT/ RESPONDENT: SMUD, et al.	
DEPOSITION SUBPOENA For Personal Appearance	

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Philip Joukoff, 234 Corte De La Rana, Walnut Creek, CA 94598, (925) 788-0233

1. YOU ARE ORDERED TO APPEAR IN PERSON TO TESTIFY AS A WITNESS in this action at the following time and place:

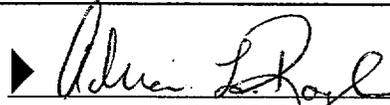
Date: 9/6/01, 9/7/01 Time: 10:00 a.m. Address: 101 California Street, Suite 2200,
 San Francisco, Jackson Conference Room

- a. As a deponent who is not a natural person, you are ordered to designate one or more persons to testify on your behalf as to the matters described in item 2. (Code Civ. Proc., § 2025, subd. (d)(6).)
 - b. This deposition will be recorded stenographically through the instant visual display of testimony, and by audiotape videotape.
 - c. This videotape deposition is intended for possible use at trial under Code of Civil Procedure section 2025(u)(4).
2. If the witness is a representative of a business or other entity, the matters upon which the witness is to be examined are as follows:

3. At the deposition, you will be asked questions under oath. Questions and answers are recorded stenographically at the deposition; later they are transcribed for possible use at trial. You may read the written record and change any incorrect answers before you sign the deposition. You are entitled to receive witness fees and mileage actually traveled both ways. The money must be paid, at the option of the party giving notice of the deposition, either with service of this subpoena or at the time of the deposition.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: August 7, 2001
 ADRIAN L. RANDOLPH, S.B.#133577
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)
 Attorney for Defendants
 (TITLE)

(Proof of service on reverse)

**DEPOSITION SUBPOENA
FOR PERSONAL APPEARANCE**



1 DANA S. APPLING, State Bar No. 107640
General Counsel
2 BRUCE NOTAREUS, State Bar No. 137683
Senior Counsel
3 SACRAMENTO MUNICIPAL UTILITY DISTRICT
6201 S Street
4 P.O. Box 15830
Sacramento, CA 95852-1830
5 Telephone: (916) 732-6122
Facsimile: (916) 732-6581

6 BARRY & RANDOLPH, LLP
7 ADRIAN L. RANDOLPH, State Bar No. 133577
MICHELLE J. DREES, State Bar No. 162888
8 1000 G Street, Suite 100
Sacramento, California 95814
9 Telephone: (916) 443-4443
Facsimile: (916) 443-2124

10 Attorneys for Defendants
11 SACRAMENTO MUNICIPAL UTILITY DISTRICT,
STEVEN REDEKER, JIM FIELD, DALE FLOWERS,
12 and DALE FLOWERS & ASSOCIATES

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF SACRAMENTO
16

17 JAMES SAUM,

No. 00AS00207

18 Plaintiff,

**NOTICE OF TAKING
DEPOSITION BY SUBPOENA**

19 vs.

20 SACRAMENTO MUNICIPAL UTILITY DISTRICT,
STEVEN REDEKER, JIM FIELD, DALE FLOWERS
21 individually and dba DALE FLOWERS &
ASSOCIATES, and DOES 1 through 50, inclusive,

22 Defendants.
23 _____/

24 TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

25 ///

26 ///

Barry &
Randolph,
LLP

1 WITNESS: PHILIP JOUKOFF
2 DATES: September 6, 2001
3 September 7, 2001
4 TIME: 10:00 a.m.
5 LOCATION: WARTNICK, CHABER, HAROWITZ & TIGERMAN
6 101 California Street, Suite 2200
7 Jackson Conference Room
8 San Francisco, CA 94111-5802

8 At the dates, time and place specified above, the parties represented by BARRY &
9 RANDOLPH, LLP, will take the deposition of the witness named in this notice pursuant to Code
10 of Civil Procedure section 2025, before a certified shorthand reporter authorized to administer
11 oaths in the State of California who is present at the specified time and place. The deposition will
12 be recorded stenographically and by Realtime. The deposition will continue from day to day,
13 excluding Saturdays, Sundays and holidays, until completed.

14 This notice is being served on the parties listed on the attached proof of service.

15 DATED: August 7, 2001

16 BARRY & RANDOLPH, LLP

17
18 By  _____
ADRIAN L. RANDOLPH

19 Attorneys for Defendants SACRAMENTO MUNICIPAL
20 UTILITY DISTRICT, STEVEN REDEKER, JIM FIELD,
21 DALE FLOWERS and DALE FLOWERS &
22 ASSOCIATES

23
24 ALR:tjb
25 47\1386\joukoff. depo notice
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Barry &
Randolph,
LLP