IN THE COURT OF COMMON PLEAS DAUPHIN COUNTY, PENNSYLVANIA

U.S. LAW SHIELD OF PENNSYLVANIA,

LLC, EX REL. TODD HOOVER;

JUSTIN J. MCSHANE, AN INDIVIDUAL : No.: 2015-CV-255-EQ

:

PLAINTIFFS : CIVIL ACTION EQUITY

v. :

:

CITY OF HARRISBURG;

MAYOR ERIC PAPENFUSE; :

WANDA WILLIAMS,

SANDRA REID, : BRAD KOPLINSKI. :

BRAD KOPLINSKI, : BEN ALATT, :

JEFF BALTIMORE, :

SUSAN WILSON, : SHAMAINE DANIELS, :

HARRISBURG CITY COUNCIL MEMBERS; AND

THOMAS CARTER,

CITY OF HARRISBURG CHIEF OF POLICE

:

DEFENDANTS

NOTICE TO TAKE DEPOSITION

TO: Jeff Baltimore

c/o Frank Lavery Jr. Joshua M. Autry Jessica Hosenpud Lavery Faherty 225 Market Street P.O Box 1245

Harrisburg, PA 17108

Please take notice that pursuant to Pa.R.C.P. No. 4007.1 the deposition of **JEFF BALTIMORE** will be taken upon oral examination before a notary public or some other officer authorized by law to administer oaths on the **19**th **day of March 2015.** The deposition will be taken at the offices of The McShane Firm, LLC, 3601 Vartan Way, 2nd Floor, Harrisburg, PA 17110, commencing **at 10:00 a.m.** on said date, and taking of the same will be adjourned and continued from day to day in the same place until the same is completed, to be used in the trial of the matter captioned above.

Respectfully submitted,

THE MCSHANE FIRM, LLC

FOR

Justin J. McShane

Attorney ID No. 87919

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Attorneys for Plaintiffs

CERTIFICATE OF MAILING

The undersigned hereby certifies that on the 25 th day of February, 2015 a true and correct copy of the above instrument was sent by both United States Regular Mail, postage prepaid, and electronic mail, to all known counsel of record, listed below.

Frank Lavery Jr.
Joshua M. Autry
Jessica Hosenpud
Lavery Faherty
225 Market Street
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YOR

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