

IN THE CIRCUIT COURT OF THE SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA

OFFICE OF THE ATTORNEY GENERAL,
DEPARTMENT OF LEGAL AFFAIRS,
STATE OF FLORIDA

CASE NO. 08-007686 (08)

Plaintiff,

vs.

LAURA L. HESS, ESQ.,
LAURA HESS & ASSOCIATES, P.A.,
HESS KENNEDY CHARTERED LLC, and
THE CONSUMER LAW CENTER, LLC.,

Defendants.

**RECEIVER'S NOTICE OF TAKING DEPOSITION DUCES TECUM
OF LEE STEIN, ESQ.**

TO: *see attached Service List*

PLEASE TAKE NOTICE that pursuant to Florida Rule of Civil Procedure 1.310, Receiver, Daniel J. Stermer, by and through undersigned counsel and pursuant to the Court's July 18, 2008, *Ex-Parte* Order Appointing Receiver, will take the deposition of the witness listed below, **and the witness shall have with him at the time and place indicated below the documents listed on the attached Schedule "A."**

NAME	PLACE	DATE/TIME
Lee Stein, Esq. 1755 E. Hallandale Beach Blvd. Suite 1606 E. Hallandale, FL 33009 561-400-8246 Telephone	Berger Singerman 350 East Las Olas Boulevard Suite 1000 Fort Lauderdale, FL 33301 (954) 525-9900 Telephone	November 26, 2008 at 9 a.m.

Said depositions will be taken before Brown & Gallo or any other Notary Public or any officer authorized to administer oaths, and a person who is neither a relative nor employee of such

BERGER SINGERMAN *Boca Raton Fort Lauderdale Miami Tallahassee*
attorneys at law

350 East Las Olas Boulevard Suite 1000 Fort Lauderdale, Florida 33301 Telephone 954-525-9900 Facsimile 954-523-2872

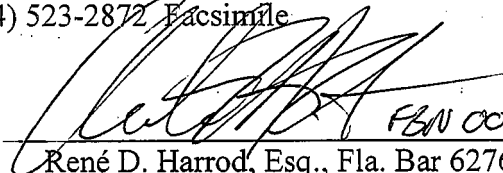
attorney or counsel, and who is not financially interested in this action. The deposition shall be taken pursuant to the Florida Rules of Civil Procedure and will continue from hour to hour and from day to day until completed.

I HEREBY CERTIFY that a true and correct copy of the foregoing has been sent via U.S. Mail, postage prepaid, and facsimile (unless indicated otherwise on the attached Service List), on this 20th day of November, 2008, to the parties listed on the attached Service List.

Respectfully Submitted,

BERGER SINGERMAN
Attorneys for Receiver, Daniel J. Stermer
350 East Las Olas Boulevard, Suite 1000
Fort Lauderdale, FL 33301
(954) 525-9900 Telephone
(954) 523-2872 Facsimile

By:


René D. Harrod, Esq., Fla. Bar 627666
rharrod@bergersingerman.com

If you are a person with a disability who needs any accommodation in order to participate in this proceeding, you are entitled, at no cost to you, to the provision of certain assistance. Please contact René D. Harrod, Esq., Berger Singerman, 350 E. Las Olas Boulevard, Suite 1000, Fort Lauderdale, FL 33301; telephone number (954) 525-9900 within two (2) working days of your receipt of this Notice of Taking Depositions; if you are hearing or voice impaired, call 1-800-955-8771 via Florida Relay Service.

SERVICE LIST

*(Office of the Attorney General v. Hess)
(Case No. CACE08-007686 (08))*

René D. Harrod, Esq.
Berger Singerman
350 East Las Olas Boulevard
Suite 1000
Fort Lauderdale, Florida 33301
(954) 525-9900 Telephone
(954) 523-2872 Facsimile
rharrod@bergersingerman.com
Attorneys for Receiver

David Feingold, Esq.
Feingold and Kam
5100 PGA Boulevard
Second Floor
Palm Beach Gardens, FL 33418
(561) 630-6727 Telephone
(561) 630-8936 Facsimile
david@fkfirm.com
Co-Counsel for Defendants

Philip A. Lehman, Esq.
M. Lynne Weaver, Esq.
North Carolina Attorney General
N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602
(919) 716-1619 Telephone
(919) 716-6750 Facsimile
(919) 716-6050 Facsimile
lweaver@ncdoj.gov
Counsel for the State of North Carolina

Fulvio J. Gentili, Esq.
Office of the Attorney General
110 SE 6th Street
9th Floor
Fort Lauderdale, FL 33301
(954) 712-4600 Telephone
(954) 712-4658 Facsimile
Attorneys for Plaintiff

Edward P. Boyle, Esq.
Venable LLP
Rockefeller Center
1270 Avenue of the Americas
25th Floor
New York, NY 10020
(212) 808-5675 Telephone
(212) 307-5598 Facsimile
Attorneys for Seton Corp. and Americorp

Juan Carlos Arias, Esq.
The Florida Bar
5900 N. Andrews Avenue, Suite 900
Fort Lauderdale, FL 33309
(954) 772-2245 Telephone
(954) 772-0660 Facsimile
Counsel for The Florida Bar

Dennis M. Campbell, Esq.
Clarke Silverplate & Campbell, P.A.
799 Brickell Plaza, Suite 900
Miami, FL 33131
(305) 377-0700 Telephone
(305) 377-3001 Facsimile
dcampbell@csclawfirm.com
Counsel for Chase Bank USA, N.A.

Jonathan L. Pompan, Esq.
Venable LLP
575 7th Street, N.W.
Washington, DC 20004
(202) 344-4383 Telephone
(202) 344-8300 Facsimile
Attorneys for Seton Corp. and Americorp

Charles Wender
Attorney-at-Law, Chartered
190 W. Palmetto Park Road
Boca Raton, Florida 33432
(561) 368-7004 Telephone
(561) 368-5798 Facsimile

Laura Hess
9447 Satinleaf Place
Parkland, FL 33076
laurahessesq@yahoo.com
Defendant
(via electronic mail and
U.S. mail, postage prepaid)

Edward Cherry
10985 NW 71st Ct
Parkland, FL 33076
edcherry@ymail.com
Pro se
(via electronic mail and
U.S. mail, postage prepaid)

Lorenzo Jackson, Jr.
Jackson & Associates, P.A.
Huntington Square III
3350 S.W. 148th Avenue, Suite 110
Miramar, Florida 33027
(954) 734-2803 Telephone
(954) 874-1699 Facsimile
Attorney for Estabrook and Colette R. Romero

DEFINITIONS AND INSTRUCTIONS

A. "YOU" or "YOUR" as used herein means LEE STEIN, ESQ., and includes and is not limited to any and all persons associated with LEE STEIN, ESQ., including but not limited to employees, accountants, auditors, agents, representatives, servants, attorneys and any other person or entity acting or purporting to act on his behalf.

B. "DOCUMENTS" as used herein means the original or copies of any tangible written, typed, printed or other form of recorded or graphic matter of every kind or description, however produced or reproduced, whether mechanically or electronically recorded, draft, final original, reproduction, signed or unsigned, regardless of whether approved, signed, sent, received, redrafted, or executed, and whether handwritten, typed, printed, photostated, duplicated, carbon or otherwise copied or produced in any other manner whatsoever. Without limiting the generality of the foregoing, "documents" shall include correspondence, letters, telegrams, telexes, mailgrams, memoranda, including inter-office and intra-office memoranda, memoranda for files, memoranda of telephone or other conversations, including meetings, invoices, reports, receipts and statements of account, ledgers, notes or notations, notes or memorandum attached to or to be read with any document, booklets, books, drawings, graphs, charts, photographs, and phone records. Copies of documents, which are not identical duplications of the originals or which contain additions to or deletions from the originals or copies of the originals if the originals are not available, shall be considered to be separate documents. As used herein, the term shall also include all electronic data storage documents, electronic tapes, discs or other recordings, computer programs, printouts, data cards, studies, analysis and other data compilations from which information can be obtained including, but not limited, to e-mails and any related attachments, electronic files or other data compilations which relate to the categories of documents as requested below. Your search for these electronically stored documents shall include all of your computer hard drives, floppy discs, compact discs, backup and archival tapes, removable media such as zip drives, password protected and encrypted files, databases, electronic calendars, personal digital assistants, proprietary software and inactive or unused computer disc storage areas.

C. As used herein, the conjunctions "and" and "or" shall be interpreted in each instance as meaning "and/or" so as to encompass the broadest possible construction, and shall not be interpreted disjunctively so as to exclude any information or documents otherwise within the scope of any request.

D. Any pronouns used herein shall include and be read and applied as to encompass the alternative forms of the pronoun, whether masculine, feminine, neuter, singular or plural, and shall not be interpreted so as to exclude any information or documents otherwise within the scope of the request.

E. If you assert that any document called for by this request is protected against disclosure by the attorney's work product doctrine or by the attorney-client privilege, you shall provide the following information with respect to such document:

1. the type or nature of the document;
2. the name and capacity of the person or persons who prepared the documents;
3. the name and capacity of all addresses or recipients of the original or copies thereof;
4. the date, if any, borne by the document;
5. a brief description of its subject matter;
6. the source of the factual information from which such document was prepared; and
7. the nature of the privilege claimed.

F. You must produce all documents within your care, custody or control that are responsive to any of these requests. A document is deemed within your care, custody or control if you have the right or ability to secure the document or a copy thereof from any other person having physical possession thereof.

G. If you at any time had possession, custody or control of a document called for under this request and if such document has been lost, destroyed, purged, or is not presently in your possession, custody or control, you shall describe the document, the date of its loss, destruction, purge, or separation from possession, custody or control and the circumstances surrounding its loss, destruction, purge, or separation from possession, custody or control.

H. All documents produced pursuant hereto are to be produced as they are kept in the usual course of business and shall be organized and labeled (without permanently marking the item produced) so as to correspond with the categories of each numbered request hereof.

I. When appropriate, the singular form of a word should be interpreted in the plural as may be necessary to bring within the scope hereof any documents which might otherwise be construed to be outside the scope hereof.

DOCUMENTS TO BE PRODUCED

1. All client files regarding any legal or other services you provided while employed by Hess Kennedy, Consumer Law Center, Legal Debt Center, or Campos Chartered Law Firm.
2. All documents and communications (including electronic mail) with any client of Hess Kennedy, Consumer Law Center, Legal Debt Center, or Campos Chartered Law Firm.
3. All documents and communications (including electronic mail) with any creditor, opposing party, or opposing counsel relating to any file or client of Hess Kennedy, Consumer Law Center, Legal Debt Center, or Campos Chartered Law Firm.
4. All pleadings, motions or notices filed by you in any matter pending for any client of Hess Kennedy, Consumer Law Center, Legal Debt Center, or Campos Chartered Law Firm.
5. A copy of the waiver provided to you by Donald Schneider (executed or not executed, as the case may be).

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