SUPERIOR COURT OF THE DISTRICT OF COLUMBIA **Civil Division**

STEPHEN BEHNKE, et al.,

Plaintiffs, Case 2017 CA 005989 B

VS. Judge Todd E. Edelman

DAVID HOFFMAN, et al., **Initial Conference**

Dec. 1, 2017, 9:30 AM

Defendants. Courtroom 212

NOTICE TO TAKE DEPOSITIONS

PLEASE TAKE NOTICE that, pursuant to D.C. Superior Court Rule 30, Plaintiffs shall take the following depositions, on the dates and at the times in October 2017 to be agreed upon by the parties. Plaintiffs agree to consult in advance concerning these dates and times, in order to arrive at a time amenable to the parties, counsel, and witnesses. The depositions will be taken at the offices of Plaintiffs' undersigned District of Columbia counsel, James R. Klimaski, or at such other location as the parties agree upon, before a Notary Public or a person authorized to administer oaths, and will continue from day-to-day until completed. You are invited to attend and cross-examine.

1. Heather O'Beirne Kelly, PhD

2. Jennifer F. Kelly, PhD

Dated: August 30, 2017

Respectfully submitted,

/s/ Louis J. Freeh

Louis J. Freeh, Esq. (D.C. Bar No. 332924)

Freeh Sporkin & Sullivan, LLP

2550 M St NW, First Floor Washington, DC 20037 (202) 390-5959 Attorney for Plaintiff Behnke bescript@freehgroup.com

/s/ Bonny J. Forrest

Bonny J. Forrest, Esq. (pro hac vice motion pending) 555 Front Street, Suite 1403
San Diego, California 92101
(917) 687-0271
Attorney for Plaintiffs Banks, Dunivin, James and Newman bonforrest@aol.com

/s/ James R. Klimaski

James R. Klimaski, Esq. (D.C. Bar No. 243543) Klimaski & Associates, P.C. 1717 N St NW – Suite 2 Washington, DC 20036 (202) 296-5600 Attorney for all Plaintiffs Klimaski@Klimaskilaw.com