

100<sup>TH</sup> JUDICIAL DISTRICT COURT FOR THE PARISH OF BLACK ACRE  
STATE OF LOUISIANA

NO. 123-456

DIVISION "A"

JANE DOE,  
Petitioner,  
-versus-  
JOHN DOE,  
Defendant.

FILED: \_\_\_\_\_

\_\_\_\_\_  
DEPUTY CLERK

**NOTICE OF RECORDS DEPOSITION<sup>1</sup>**

TO: JANE DOE  
*Through her attorney of record*  
Support Inc.  
Attorneys at Law  
123 Canal Street  
Black Acre, Louisiana 70000

PLEASE TAKE NOTICE, that the undersigned attorney will take the deposition of the following:

ABC DEPARTMENT STORES  
Attn: Human Resources/Accounting/Payroll Department  
123 FRONT STREET  
SPRINGFIELD, LA 12345

in the office of John Doe, Sr., 123 Maple Leaf Drive, Black Acre, Louisiana 70000, on the \_\_\_\_\_ day of \_\_\_\_\_, 200\_\_\_\_, at \_\_\_\_\_ O'CLOCK a.m., for the purpose of records production.

THIS DEPOSITION IS SCHEDULED STRICTLY FOR THE PRODUCTION OF DOCUMENTS; NO APPEARANCE IS REQUIRED.

Respectfully Submitted,

JOHN DOE  
123 Maple Leaf Drive  
Black Acre, Louisiana 70000  
(504) 555-1212

\_\_\_\_\_  
JOHN DOE

<sup>1</sup> The United States Supreme Court has held that the allegations of a pro se litigant's pleadings are to be held "to less stringent standards than formal pleadings drafted by lawyers." *Haines v. Kerner*, 404 U.S. 519, 520, 92 S.Ct. 594, 30 L.Ed.2d 652 (1972). Article 865 of the Louisiana Code of Civil Procedure mandates that every pleading shall be construed as to do substantial justice.

In Proper Person

**CERTIFICATE OF SERVICE**

I hereby certify that I have served a copy of the foregoing pleading on all counsel to this proceeding by facsimile transmission, hand delivery, or by placing same in the U.S. mail, first class, postage prepaid, this \_\_\_\_\_ day of \_\_\_\_\_, 2004.

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JOHN DOE