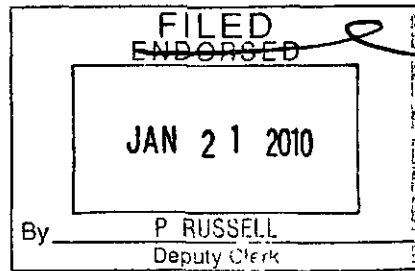


1 GLENN HAGELE  
8543 Everglade Dr  
2 Sacramento CA 95826  
Phone: (916) 381-2442  
3 Email: glenn.hagele@usaeyes.org



4 GLENN HAGELE, *in pro per*

5  
6 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
7 FOR THE COUNTY OF SACRAMENTO  
8

9 GLENN HAGELE,

10 Plaintiff,

11 vs.

12 BRENT HANSON, *et al*

13 Defendant  
14  
15  
16  
17  
18  
19

Case No.: 06-AS00839

**NOTICE OF MOTION AND MOTION  
TO TAKE DEPOSITION OF  
DEFENDANT BRENT HANSON  
BEYOND GEOGRAPHIC LIMITS AND  
SANCTIONS; MEMORANDUM OF  
POINTS AND AUTHORITIES IN  
SUPPORT; DECLARATION OF  
GLENN HAGELE IN SUPPORT**

Hearing Date: February 18, 2010  
Hearing Time: 2:00pm

Department 53

Judge: Honorable Loren McMaster

Action First Filed: March 2, 2006

20 TO EACH PARTY AND TO THE COUNSEL OF RECORD FOR EACH PARTY:

21 NOTICE IS HEREBY GIVEN that on the date and time indicated above, or as soon thereafter  
22 as the matter may be heard; in the courtroom of the department indicated above; of the above-entitled  
23 court located on the third floor of 800 9th Street, Sacramento, California; then and there Plaintiff  
24 Glenn Hagele will, and hereby does, move for an order authorizing the taking of the deposition on  
25 oral examination of Defendant Brent Hanson at a location outside the county of the deponent's  
26 assumed place of residence and more than 150 miles from the deponent's assumed place of residence.

27 The motion will be made under Code Civ. Proc., § 2025.260, on the grounds that interests of  
28 justice and fairness will be served in that; deponent refuses to disclose his actual residence; deponent

1 will not be inconvenienced or put to great expense; to proceed otherwise would be prohibitive; and  
2 that Plaintiff Glenn Hagele made a reasonable and good faith attempt at informal resolution of the  
3 issues presented by this motion.

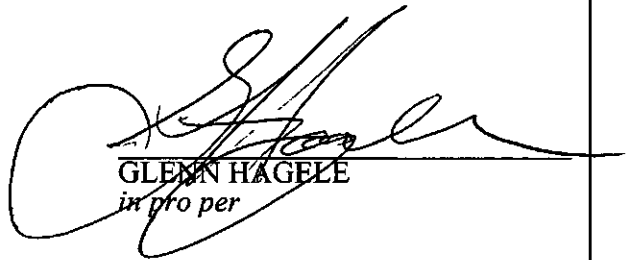
4 The motion will be based upon this notice, the attached memorandum in support; the attached  
5 declaration of Glenn Hagele, the records and files in this action, and on such evidence as may be  
6 presented at the hearing of this motion.

7 Pursuant to Local Rule 3.04, the court will make a tentative ruling on the merits of this matter  
8 by 2:00 p.m., the court day before the hearing. You may access and download the court's ruling from  
9 the court's website at <http://www.saccourt.com>. If you do not have online access, you may obtain the  
10 tentative ruling over the telephone by calling (916) 874-8142 and a deputy clerk will read the ruling  
11 to you. If you wish to request oral argument, you must contact the courtroom clerk at (916) 874-7858  
12 (Department 53) or (916) 874-7848 (Department 54) and the opposing party before 4:00 p.m. the  
13 court day before the hearing. If you do not call the court and the opposing party by 4:00 p.m. on the  
14 court day before the hearing, no hearing will be held.

15 ///

16 DATED: January 21, 2010

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GLENN HAGELE  
*in pro per*

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