

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 17-cv-00884-CMA-STV

CHAYCE AARON ANDERSON,

Plaintiff,

v.

JASON SHUTTERS,

Defendant.

**DEFENDANT JASON SUTTHER'S UNOPPOSED MOTION TO CONDUCT A
DEPOSITION OF AN INCARCERATED INMATE PLAINTIFF PURSUANT TO FED. R.
CIV. P. 30(a)(2)(B)**

Defendant Jason Shutters, by and through his attorney, Hall & Evans, L.L.C., submits the following as his Motion to Conduct A Deposition of an Incarcerated Inmate Plaintiff, and as grounds therefor state as follows:

Certificate of Compliance with D.C.COLO.LCivR 7.1(A)

Pursuant to D.C.COLO.LCivR 7.1(A), the undersigned counsel conferred with counsel for the Plaintiff. Plaintiff does not oppose the requested relief.

1. Pursuant to Fed. R. Civ. P. 30(a)(2)(B), an order from this Court is required for Defendant to conduct the deposition of the Plaintiff, who is incarcerated by the Colorado Department of Corrections. Plaintiff is currently located at the Arkansas Valley Correctional Facility, 12750 CO-96, Ordway, CO 81034.

2. Defendant respectfully requests this Court issue an order allowing Defendant to depose Plaintiff at his current correctional facility or any subsequent correctional facility where he may be moved after the entry of an appropriate order.

WHEREFORE, Defendant respectfully requests this Court issue an order allowing the deposition of Plaintiff pursuant to F.R.C.P. 30(a)(2)(B), and for all other and further relief as this Court deems necessary.

Dated: December 21, 2018.

Respectfully Submitted

Duly Signed original in the file located at
Hall & Evans, LLC

/s/ Mark S. Ratner

Mark S. Ratner, #38517
Hall & Evans, LLC
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**Attorneys for Defendant Jason
Shutters**

CERTIFICATE OF SERVICE (CM/ECF)

I hereby certify that on this 21st of December, 2018, I served via email the foregoing **DEFENDANT JASON SUTTHER'S UNOPPOSED MOTION TO CONDUCT A DEPOSITION OF AN INCARCERATED INMATE PLAINTIFF PURSUANT TO FED. R. CIV. P. 30(a)(2)(B)** to the following:

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