

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MICHIGAN  
BAY CITY

IN RE: Kevin W. Kulek

Chapter 7 Petition  
16-21030-dob  
Honorable Daniel Opperman

\_\_\_\_\_/   
RANDALL L. FRANK, TRUSTEE,  
Plaintiff,

Adversary Case Number  
17-02014-dob  
Honorable Daniel Opperman

V

JONATHAN ANDREW PINFIELD-WELLS,  
Defendant.

\_\_\_\_\_/   
Keith M. Nathanson, P41633  
Special Litigation Counsel to Randall L. Frank, Trustee  
Attorney for Plaintiff  
Keith M. Nathanson, PLLC  
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w. Jay Brown, P58858  
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**Notice of Taking Deposition Defendant pursuant to F.R.Civ.P. Rule 30**

Please take notice that the deposition of Defendant, Jonathan Pinfield-Wells, will be taken on Monday, July 31, 2017 at 10:00 a.m. at the offices of Keith M. Nathanson, PLLC, 2745 Pontiac Lake Road, Waterford, MI 48328.

Please take notice that Plaintiff requests and hereby gives notice, pursuant to F.R.Civ.P. Rule 34, that Defendant produce the following:

1. Any and all contracts between Defendant and Kevin Kulek, Skit-B Pinball or any other entity responsible for and/or associated with developing, manufacturing, designing,

producing or delivering a Predator pinball machine or Experts of Dangerous pinball machine.

2. Records of any and all correspondence or communication, either written or verbal between Defendant and Kevin Kulek, Skit-B Pinball or any other entity responsible for and/or associated with developing, manufacturing, designing, producing or delivering a Predator pinball machine or Experts of Dangerous pinball machine.
3. Any and all documents upon which Defendant intends to rely upon in the trial or other disposition of this matter.

Respectfully submitted,

/s/ Keith M. Nathanson  
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Dated: July 24, 2017